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DETAILED MODEL PLAN (LIHEAP)

Program Name: Low Income Home Energy Assistance
Grantee Name: South Carolina
Report Name: DETAILED MODEL PLAN (LIHEAP) Revision # 2
Report Period: 10/01/2019 to 09/30/2020
Report Status: Submitted (Revision #2)

Report Sections

1. ***Mandatory Grant Application SF-424***
2. ***Section 1 - Program Components***
3. ***Section 2 - HEATING ASSISTANCE***
4. ***Section 3 - COOLING ASSISTANCE***
5. ***Section 4 - CRISIS ASSISTANCE***
6. ***Section 5 - WEATHERIZATION ASSISTANCE***
7. ***Section 6 - Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)***
8. ***Section 7 - Coordination, 2605(b)(4) - Assurance 4***
9. ***Section 8 - Agency Designation,, 2605(b)(6) - Assurance 6***
10. ***Section 9 - Energy Suppliers,, 2605(b)(7) - Assurance 7***
11. ***Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10***
12. ***Section 11 - Timely and Meaningful Public Participation, , 2605(b)(12) - Assurance 12, 2605(c)(2)***
13. ***Section 12 - Fair Hearings,2605(b)(13) - Assurance 13***
14. ***Section 13 - Reduction of home energy needs,2605(b)(16) - Assurance 16***
15. ***Section 14 - Leveraging Incentive Program ,2607A***
16. ***Section 15 - Training***
17. ***Section 16 - Performance Goals and Measures, 2605(b)***
18. ***Section 17 - Program Integrity, 2605(b)(10)***
19. ***Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters***
20. ***Section 19: Certification Regarding Drug-Free Workplace Requirements***
21. ***Section 20: Certification Regarding Lobbying***
22. ***Assurances***
23. ***Plan Attachments***

Mandatory Grant Application SF-424

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES

August 1987, revised 05/92,02/95,03/96,12/98,11/01
OMB Clearance No.: 0970-0075
Expiration Date: 09/30/2020

LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP)
MODEL PLAN
SF - 424 - MANDATORY

* 1.a. Type of Submission:	* 1.b. Frequency:	* 1.c. Consolidated Application/ Plan/Funding Request? Explanation:	* 1.d. Version:
(•) Plan	(•) Annual		(•) Initial ( ) Resubmission ( ) Revision ( ) Update
		2. Date Received:	State Use Only:
		3. Applicant Identifier:	
		4a. Federal Entity Identifier:	5. Date Received By State:
		4b. Federal Award Identifier:	6. State Application Identifier:

7. APPLICANT INFORMATION

*** a. Legal Name:** South Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
576000286	079733487

*** d. Address:**

* Street 1:	1205 PENDLETON STREET, SUITE 357	Street 2:	
* City:	COLUMBIA	County:	
* State:	SC	Province:	
* Country:	United States	* Zip / Postal Code:	29201 - 3734

e. Organizational Unit:

Department Name:	Division Name:
Office of Executive Policy and Programs	Economic Opportunity

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	* First Name:	Middle Name:	* Last Name:
	Kelly	Sumpter	Sumpter
Suffix:	Title: Senior Manager of CSBG/LIHEAP	Organizational Affiliation:	
* Telephone Number: (803) 734-0579	Fax Number (803) 734-0356	* Email: kelly.sumpter@admin.sc.gov	

*** 8a. TYPE OF APPLICANT:**
A: State Government

b. Additional Description:

*** 9. Name of Federal Agency:**

	Catalog of Federal Domestic Assistance Number:	CFDA Title:
10. CFDA Numbers and Titles	93568	Low-Income Home Energy Assistance

11. Descriptive Title of Applicant's Project

12. Areas Affected by Funding:

13. CONGRESSIONAL DISTRICTS OF:	
* a. Applicant 06	b. Program/Project: Statewide
Attach an additional list of Program/Project Congressional Districts if needed.	

14. FUNDING PERIOD:		15. ESTIMATED FUNDING:	
a. Start Date: 10/01/2019	b. End Date: 09/30/2020	* a. Federal ($): $0	b. Match ($): $0

*** 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?**

a. This submission was made available to the State under the Executive Order 12372

Process for Review on :

b. Program is subject to E.O. 12372 but has not been selected by State for review.

c. Program is not covered by E.O. 12372.

*** 17. Is The Applicant Delinquent On Any Federal Debt?**

- ○ YES
- ◉ NO

Explanation:

18. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

****I Agree** ☑

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.**

18a. Typed or Printed Name and Title of Authorized Certifying Official	18c. Telephone (area code, number and extension)
Kelly Sumpter	(803) 734-0579
	18d. Email Address kelly.sumpter@admin.sc.gov
18b. Signature of Authorized Certifying Official Esign	18e. Date Report Submitted (Month, Day, Year) 06/26/2020

Attach supporting documents as specified in agency instructions.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES

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MODEL PLAN
SF - 424 - MANDATORY

Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Washington, DC 20201

August 1987, revised 05/92, 02/95, 03/96, 12/98, 11/01
OMB Approval No. 0970-0075
Expiration Date: 09/30/2020

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.

Section 1 Program Components

Program Components, 2605(a), 2605(b)(1) - Assurance 1, 2605(c)(1)(C)

1.1 Check which components you will operate under the LIHEAP program. (Note: You must provide information for each component designated here as requested elsewhere in this plan.)		Dates of Operation	
		Start Date	End Date
☑	Heating assistance	01/01/2020	04/30/2020
☑	Cooling assistance	05/01/2020	09/30/2020
☑	Crisis assistance	01/01/2020	09/30/2020
☑	Weatherization assistance	04/01/2020	03/31/2021

Provide further explanation for the dates of operation, if necessary

South Carolina will operate the LIHEAP program based on the calendar year, January 1 - December 31, 2020. Therefore, heating assistance will also be provided October 1 – December 31, 2020. South Carolina utilizes the SC Enterprise Information System (SCEIS) to ensure the proper tracking of federal grant awards by the appropriate year.

Estimated Funding Allocation, 2604(C), 2605(k)(1), 2605(b)(9), 2605(b)(16) - Assurances 9 and 16

1.2 Estimate what amount of available LIHEAP funds will be used for each component that you will operate: The total of all percentages must add up to 100%.	Percentage (%)
Heating assistance	20.00%
Cooling assistance	15.00%
Crisis assistance	25.00%
Weatherization assistance	15.00%
Carryover to the following federal fiscal year	10.00%

Administrative and planning costs	10.00%
Services to reduce home energy needs including needs assessment (Assurance 16)	5.00%
Used to develop and implement leveraging activities	0.00%
TOTAL	100.00%

Alternate Use of Crisis Assistance Funds, 2605(c)(1)(C)

1.3 The funds reserved for winter crisis assistance that have not been expended by March 15 will be reprogrammed to:

☑	Heating assistance	☑	Cooling assistance
☐	Weatherization assistance	☐	Other (specify:)

Categorical Eligibility, 2605(b)(2)(A) - Assurance 2, 2605(c)(1)(A), 2605(b)(8A) - Assurance 8

1.4 Do you consider households categorically eligible if one household member receives one of the following categories of benefits in the left column below? ○ Yes ◉ No

If you answered "Yes" to question 1.4, you must complete the table below and answer questions 1.5 and 1.6.

	Heating	Cooling	Crisis	Weatherization
TANF	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No
SSI	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No
SNAP	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No
Means-tested Veterans Programs	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No

	Program Name	Heating	Cooling	Crisis	Weatherization
Other(Specify) 1		○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No

1.5 Do you automatically enroll households without a direct annual application? ○ Yes ◉ No

If Yes, explain:

1.6 How do you ensure there is no difference in the treatment of categorically eligible households from those not receiving other public assistance when determining eligibility and benefit amounts?

SNAP Nominal Payments

1.7a Do you allocate LIHEAP funds toward a nominal payment for SNAP households? ○ Yes ◉ No

If you answered "Yes" to question 1.7a, you must provide a response to questions 1.7b, 1.7c, and 1.7d.

1.7b Amount of Nominal Assistance: $0.00

1.7c Frequency of Assistance

☐	Once Per Year
☐	Once every five years
☐	Other - Describe:

1.7d How do you confirm that the household receiving a nominal payment has an energy cost or need?

Determination of Eligibility - Countable Income

1.8. In determining a household's income eligibility for LIHEAP, do you use gross income or net income ?

☑	Gross Income
☐	Net Income

1.9. Select all the applicable forms of countable income used to determine a household's income eligibility for LIHEAP

☑	Wages

☑	**Self - Employment Income**
☑	**Contract Income**
☐	**Payments from mortgage or Sales Contracts**
☑	**Unemployment insurance**
☐	**Strike Pay**
☑	**Social Security Administration (SSA) benefits**
	☑ **Including MediCare deduction** ☐ **Excluding MediCare deduction**
☑	**Supplemental Security Income (SSI)**
☑	**Retirement / pension benefits**
☐	**General Assistance benefits**
☑	**Temporary Assistance for Needy Families (TANF) benefits**
☐	**Supplemental Nutrition Assistance Program (SNAP) benefits**
☐	**Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits**
☐	**Loans that need to be repaid**
☑	**Cash gifts**
☐	**Savings account balance**
☑	**One-time lump-sum payments, such as rebates/credits, winnings from lotteries, refund deposits, etc.**
☐	**Jury duty compensation**
☑	**Rental income**
☑	**Income from employment through Workforce Investment Act (WIA)**
☐	**Income from work study programs**
☑	**Alimony**
☑	**Child support**
☐	**Interest, dividends, or royalties**
☑	**Commissions**
☑	**Legal settlements**
☐	**Insurance payments made directly to the insured**
☐	**Insurance payments made specifically for the repayment of a bill, debt, or estimate**

☑	**Veterans Administration (VA) benefits**
☐	**Earned income of a child under the age of 18**
☐	**Balance of retirement, pension, or annuity accounts where funds cannot be withdrawn without a penalty.**
☐	**Income tax refunds**
☐	**Stipends from senior companion programs, such as VISTA**
☐	**Funds received by household for the care of a foster child**
☐	**Ameri-Corp Program payments for living allowances, earnings, and in-kind aid**
☐	**Reimbursements (for mileage, gas, lodging, meals, etc.)**
☑	**Other** Utility checks provided directly to the customer as a utility allowance.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES

August 1987, revised 05/92,02/95,03/96,12/98,11/01
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LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN
SF - 424 - MANDATORY

Section 2 - Heating Assistance

Eligibility, 2605(b)(2) - Assurance 2

2.1 Designate the income eligibility threshold used for the heating component:

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	150.00%

2.2 Do you have additional eligibility requirements for HEATING ASSITANCE?	(●) Yes ( ) No
2.3 Check the appropriate boxes below and describe the policies for each.	
Do you require an Assets test ?	( ) Yes (●) No
Do you have additional/differing eligibility policies for:	
Renters?	( ) Yes (●) No
Renters Living in subsidized housing ?	( ) Yes (●) No
Renters with utilities included in the rent ?	( ) Yes (●) No
Do you give priority in eligibility to:	
Elderly?	(●) Yes ( ) No
Disabled?	(●) Yes ( ) No
Young children?	(●) Yes ( ) No
Households with high energy burdens ?	(●) Yes ( ) No
Other? Persons not previously served, high energy users with lowest incomes, veterans, and fuel customers.	(●) Yes ( ) No

Explanations of policies for each "yes" checked above:

Elderly (60+), disabled (proof required), young children (age 5 and under), and persons not previously served are given priority for services. Elderly and disabled households are given an additional benefit, and if funds allow, an additional direct assistance service. High energy users with the lowest incomes, fuel customers and veterans will also receive an additional direct assistance non-emergency benefit.

Determination of Benefits 2605(b)(5) - Assurance 5, 2605(c)(1)(B)

2.4 Describe how you prioritize the provision of heating assistance tovulnerable populations,e.g., benefit amounts, early application periods, etc.

South Carolina considers vulnerable households as having at least one member that is elderly (age 60 or older), disabled, or a young child (age 5 and under). Benefit amounts increase when the household includes at least one member of the vulnerable population. In many cases, agencies set aside a designated day/period to serve vulnerable households, only. Eligible entities provide the state a plan to ensure vulnerable households are given priority. The state verifies prioritization during monitoring and with the annual submission of the agency's Community Action Plan.

2.5 Check the variables you use to determine your benefit levels. (Check all that apply):

- [x] **Income**
- [x] **Family (household) size**
- [x] **Home energy cost or need:**
  - [x] **Fuel type**
  - [ ] **Climate/region**

- [x] **Individual bill**
- [ ] **Dwelling type**
- [x] **Energy burden (% of income spent on home energy)**
- [x] **Energy need**
- [x] **Other - Describe:**

Each eligible household receives a minimum non-emergency benefit of $300. Additional benefits are awarded if the household/a member of the household is: elderly ($75); disabled ($50); household income 100% of the FPL or less ($75); child age 5 or under ($50); household energy burden is demonstrated ((20% or more of income used for utilities) $75); heats with fuel ($75); a veteran ($50). The maximum non-emergency benefit during the heating season is $750.

Benefit Levels, 2605(b)(5) - Assurance 5, 2605(c)(1)(B)

2.6 Describe estimated benefit levels for FY 2020:

Minimum Benefit	$300	**Maximum Benefit**	$750

2.7 Do you provide in-kind (e.g., blankets, space heaters) and/or other forms of benefits? ○ Yes ◉ No

If yes, describe.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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MODEL PLAN
SF - 424 - MANDATORY

Section 3 - Cooling Assistance

Eligibility, 2605(c)(1)(A), 2605 (b)(2) - Assurance 2

3.1 Designate The income eligibility threshold used for the Cooling component:

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	150.00%

3.2 Do you have additional eligibility requirements for COOLING ASSITANCE?	(•) Yes ( ) No
3.3 Check the appropriate boxes below and describe the policies for each.	
Do you require an Assets test ?	( ) Yes (•) No
Do you have additional/differing eligibility policies for:	
Renters?	( ) Yes (•) No
Renters Living in subsidized housing ?	( ) Yes (•) No
Renters with utilities included in the rent ?	( ) Yes (•) No
Do you give priority in eligibility to:	
Elderly?	(•) Yes ( ) No
Disabled?	(•) Yes ( ) No
Young children?	(•) Yes ( ) No
Households with high energy burdens ?	(•) Yes ( ) No
Other? Persons not previously served, high energy users with lowest incomes and veterans.	(•) Yes ( ) No

Explanations of policies for each "yes" checked above:

Elderly (60+), disabled (proof required), young children (age 5 and under), and persons not previously served are given priority for services. Elderly and disabled households are given an additional benefit, and if funds allow, an additional direct assistance service. High energy users with lowest incomes and veterans will also receive an additional direct assistance benefit.

3.4 Describe how you prioritize the provision of cooling assistance tovulnerable populations,e.g., benefit amounts, early application periods, etc.

South Carolina considers vulnerable households as having at least one member that is elderly (age 60 or older), disabled, or a young child (age 5 and under). Benefit amounts increase when the household includes at least one member of the vulnerable population. In many cases, agencies set aside a designated day/period to serve vulnerable households, only. Eligible entities provide the State a plan to ensure vulnerable households are given priority. The state verifies prioritization during monitoring and with the annual submission of the agency's Community Action Plan.

Determination of Benefits 2605(b)(5) - Assurance 5, 2605(c)(1)(B)

3.5 Check the variables you use to determine your benefit levels. (Check all that apply):

- [x] **Income**
- [x] **Family (household) size**
- [x] **Home energy cost or need:**
  - [ ] **Fuel type**

- [ ] Climate/region
- [x] Individual bill
- [ ] Dwelling type
- [x] Energy burden (% of income spent on home energy)
- [x] Energy need
- [x] Other - Describe:

The minimum non-emergency benefit provided during the cooling season is $300. Additional benefits are awarded if: elderly ($75); disabled ($50); household income 100% of the FPL or less ($75); child age 5 or under ($50); household energy burden is demonstrated ((20% or more of income used for utilities) $75); veteran ($50). The maximum non-emergency benefit during the cooling season is $675.

Benefit Levels, 2605(b)(5) - Assurance 5, 2605(c)(1)(B)

3.6 Describe estimated benefit levels for FY 2020:

Minimum Benefit	$300	**Maximum Benefit**	$675

3.7 Do you provide in-kind (e.g., fans, air conditioners) and/or other forms of benefits? ○ Yes ◉ No

If yes, describe.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES

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SF - 424 - MANDATORY

Section 4: CRISIS ASSISTANCE

Eligibility - 2604(c), 2605(c)(1)(A)

4.1 Designate the income eligibility threshold used for the crisis component

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	150.00%

4.2 Provide your LIHEAP program's definition for determining a crisis.

An energy crisis is when a low-income household is facing imminent disconnection and/or needs restoration of their home heating/cooling source. An energy crisis may also be the result of weather or energy-related emergencies.

4.3 What constitutes a life-threatening crisis?

A life-threatening crisis is an emergency requiring immediate action to prevent the loss or impairment of life/health due to a medical condition if the household's energy service is interrupted.

Crisis Requirement, 2604(c)

4.4 Within how many hours do you provide an intervention that will resolve the energy crisis for eligible households? 48**Hours**

4.5 Within how many hours do you provide an intervention that will resolve the energy crisis for eligible households in life-threatening situations? 18**Hours**

Crisis Eligibility, 2605(c)(1)(A)

4.6 Do you have additional eligibility requirements for CRISIS ASSISTANCE?	(•) Yes ( ) No
4.7 Check the appropriate boxes below and describe the policies for each	
Do you require an Assets test ?	( ) Yes (•) No
Do you give priority in eligibility to :	
Elderly?	(•) Yes ( ) No
Disabled?	(•) Yes ( ) No
Young Children?	(•) Yes ( ) No
Households with high energy burdens?	(•) Yes ( ) No
Other?	( ) Yes (•) No
In Order to receive crisis assistance:	
Must the household have received a shut-off notice or have a near empty tank?	(•) Yes ( ) No
Must the household have been shut off or have an empty tank?	(•) Yes ( ) No
Must the household have exhausted their regular heating benefit?	(•) Yes ( ) No
Must renters with heating costs included in their rent have received an eviction notice ?	( ) Yes (•) No
Must heating/cooling be medically necessary?	( ) Yes (•) No
Must the household have non-working heating or cooling equipment?	(•) Yes ( ) No
Other?	( ) Yes (•) No

Do you have additional / differing eligibility policies for:	
Renters?	○ Yes ◉ No
Renters living in subsidized housing?	○ Yes ◉ No
Renters with utilities included in the rent?	◉ Yes ○ No

Explanations of policies for each "yes" checked above:

At least one condition listed above must exist. Renters with utilities included in the rent are referred to CSBG for the rental amount, including the utility cost, to be satisfied if eligible.

Determination of Benefits

4.8 How do you handle crisis situations?

☑	**Separate component**
☐	**Fast Track**
☐	**Other - Describe:**

4.9 If you have a separate component, how do you determine crisis assistance benefits?

☑	**Amount to resolve the crisis.**
☐	**Other - Describe:**

Crisis Requirements, 2604(c)

4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?

◉ Yes ○ No **Explain.**

Counties are designated to each agency based on geographic location.

4.11 Do you provide individuals who are physically disabled the means to:

Submit applications for crisis benefits without leaving their homes?

◉ Yes ○ No **If No, explain.**

Travel to the sites at which applications for crisis assistance are accepted?

◉ Yes ○ No **If No, explain.**

If you answered "No" to both options in question 4.11, please explain alternative means of intake to those who are homebound or physically disabled?

Benefit Levels, 2605(c)(1)(B)

4.12 Indicate the maximum benefit for each type of crisis assistance offered.

Winter Crisis	$0.00	**maximum benefit**
Summer Crisis	$0.00	**maximum benefit**
Year-round Crisis	$1,000.00	**maximum benefit**

4.13 Do you provide in-kind (e.g. blankets, space heaters, fans) and/or other forms of benefits?

◉ Yes ○ No **If yes, Describe**

Dual heating/cooling window units, approved space heaters and fans as a crisis intervention, blankets and coats.

4.14 Do you provide for equipment repair or replacement using crisis funds?

◉ Yes ○ No

If you answered "Yes" to question 4.14, you must complete question 4.15.

4.15 Check appropriate boxes below to indicate type(s) of assistance provided.

	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair	☑	☐	☐
Heating system replacement	☑	☐	☐

Cooling system repair	☐	☑	☐
Cooling system replacement	☐	☑	☐
Wood stove purchase	☐	☐	☐
Pellet stove purchase	☐	☐	☐
Solar panel(s)	☐	☐	☑
Utility poles / gas line hook-ups	☐	☐	☑
Other (Specify): Chimney sweep service(s) as a health and safety measure for households that heat using wood stoves.	☑	☐	☐

4.16 Do any of the utility vendors you work with enforce a moratorium on shut offs?

◉ Yes ○ No

If you responded "Yes" to question 4.16, you must respond to question 4.17.

4.17 Describe the terms of the moratorium and any special dispensation received by LIHEAP clients during or after the moratorium period.

From December 1 to March 31, Dominion Energy South Carolina and Duke Energy will not disconnect a residential customer if the customer or a member of his household at the premises being served, furnishes the vendor, no less than three days prior to termination or to the terminating crew at the time of termination, a certificate on a form provided by the vendor and signed by (i) a licensed physician, stating that termination of electric and/or gas service would be especially dangerous to such person's health, and (ii) the customer, stating that he is unable to pay by installments. A certification expires 31 days after execution by the physician and may be renewed for an additional 30 days no more than three times.

South Carolina does not provide special dispensation to clients during or after the moratorium. All qualifying households may receive up to $1,000.00 in crisis benefits.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 5: WEATHERIZATION ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) - Assurance 2

5.1 Designate the income eligibility threshold used for the Weatherization component

Add	Household Size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	200.00%

5.2 Do you enter into an interagency agreement to have another government agency administer a WEATHERIZATION component? ○ Yes ◉ No

5.3 If yes, name the agency.

5.4 Is there a separate monitoring protocol for weatherization? ◉ Yes ○ No

WEATHERIZATION - Types of Rules

5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)

☐ **Entirely under LIHEAP (not DOE) rules**

☐ **Entirely under DOE WAP (not LIHEAP) rules**

☐ **Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ (Check all that apply):**

- ☐ **Income Threshold**
- ☐ **Weatherization of entire multi-family housing structure is permitted 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).**
- ☐ **Other - Describe:**

☑ **Mostly under DOE WAP rules, with the following LIHEAP rule(s) where LIHEAP and WAP rules differ (Check all that apply.)**

- ☑ **Income Threshold**
- ☑ **Weatherization not subject to DOE WAP maximum statewide average cost per dwelling unit.**
- ☑ **Weatherization measures are not subject to DOE Savings to Investment Ration (SIR) standards.**
- ☑ **Other - Describe:**

South Carolina permits subgrantees to assist shelters. The cost per unit is based on shelter regulations detailing that a weatherization provider may count each 800 square feet of the shelter as a dwelling unit or each floor level as one unit, as noted in 10 CFR 440.22(f).

Eligibility, 2605(b)(5) - Assurance 5

5.6 Do you require an assets test? ○ Yes ◉ No

5.7 Do you have additional/differing eligibility policies for :

Renters ◉ Yes ○ No

Renters living in subsidized housing?	◉ Yes ○ No
5.8 Do you give priority in eligibility to:	
Elderly?	◉ Yes ○ No
Disabled?	◉ Yes ○ No
Young Children?	◉ Yes ○ No
House holds with high energy burdens?	◉ Yes ○ No
Other? Persons not previously served.	◉ Yes ○ No

If you selected "Yes" for any of the options in questions 5.6, 5.7, or 5.8, you must provide further explanation of these policies in the text field below.

Renters must have permission from owner and rent must not increase once weatherization services are completed. Priority is given to vulnerable populations if weatherization affects health/safety.

Children defined - Households with children age 5 and under. High Energy Burden households defined – At least 20 percent of the household income is utilized to pay for energy usage. High Energy User defined – LIHEAP eligible household.

Benefit Levels

5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household? ◉ Yes ○ No

5.10 If yes, what is the maximum? $10,000

Types of Assistance, 2605(c)(1), (B) & (D)

5.11 What LIHEAP weatherization measures do you provide ? (Check all categories that apply.)

☑ **Weatherization needs assessments/audits**	☑ **Energy related roof repair**
☑ **Caulking and insulation**	☑ **Major appliance Repairs**
☑ **Storm windows**	☑ **Major appliance replacement**
☑ **Furnace/heating system modifications/ repairs**	☑ **Windows/sliding glass doors**
☑ **Furnace replacement**	☑ **Doors**
☑ **Cooling system modifications/ repairs**	☑ **Water Heater**
☑ **Water conservation measures**	☑ **Cooling system replacement**
☑ **Compact florescent light bulbs**	☑ **Other - Describe:** LED Bulbs, HVAC Assessments

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 6: Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)

6.1 Select all outreach activities that you conduct that are designed to assure that eligible households are made aware of all LIHEAP assistance available:

- [x] **Place posters/flyers in local and county social service offices, offices of aging, Social Security offices, VA, etc.**
- [x] **Publish articles in local newspapers or broadcast media announcements.**
- [x] **Include inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.**
- [x] **Mass mailing(s) to prior-year LIHEAP recipients.**
- [x] **Inform low income applicants of the availability of all types of LIHEAP assistance at application intake for other low-income programs.**
- [x] **Execute interagency agreements with other low-income program offices to perform outreach to target groups.**
- [x] **Other (specify):**

Toll-free phone lines and special assistance with language translation.

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Section 7: Coordination, 2605(b)(4) - Assurance 4

7.1 Describe how you will ensure that the LIHEAP program is coordinated with other programs available to low-income households (TANF, SSI, WAP, etc.).

☐	**Joint application for multiple programs**
☑	**Intake referrals to/from other programs**
☑	**One - stop intake centers**
☑	**Other - Describe:**

Eligible entities will also coordinate with DSS, SSA, Mental Health, Department on Aging, Vocational Rehab, HUD and local Housing Authorities. Eligible entities are required to outline coordination of efforts in the submission of their annual Community Action Plan. OEO will verify coordination efforts with other low-income programs during monitoring.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 8: Agency Designation, 2605(b)(6) - Assurance 6 (Required for state grantees and the Commonwealth of Puerto Rico)

8.1 How would you categorize the primary responsibility of your State agency?

☑	**Administration Agency**
☐	**Commerce Agency**
☐	**Community Services Agency**
☐	**Energy / Environment Agency**
☐	**Housing Agency**
☐	**Welfare Agency**
☐	**Other - Describe:**

Alternate Outreach and Intake, 2605(b)(15) - Assurance 15

If you selected "Welfare Agency" in question 8.1, you must complete questions 8.2, 8.3, and 8.4, as applicable.

8.2 How do you provide alternate outreach and intake for HEATING ASSISTANCE?

8.3 How do you provide alternate outreach and intake for COOLING ASSISTANCE?

8.4 How do you provide alternate outreach and intake for CRISIS ASSISTANCE?

8.5 LIHEAP Component Administration.	Heating	Cooling	Crisis	Weatherization
8.5a Who determines client eligibility?	Community Action Agencies	Community Action Agencies	Community Action Agencies	Community Action Agencies
8.5b Who processes benefit payments to gas and electric vendors?	Community Action Agencies	Community Action Agencies	Community Action Agencies	
8.5c who processes benefit payments to bulk fuel vendors?	Community Action Agencies	Community Action Agencies	Community Action Agencies	
8.5d Who performs installation of weatherization				Community Action

measures?				Agencies

If any of your LIHEAP components are not centrally-administered by a state agency, you must complete questions 8.6, 8.7, 8.8, and, if applicable, 8.9.

8.6 What is your process for selecting local administering agencies?

South Carolina's State law requires OEO to use local Community Action Agencies to administer LIHEAP.

8.7 How many local administering agencies do you use? 13

8.8 Have you changed any local administering agencies in the last year?

- ○ Yes
- ◉ No

8.9 If so, why?

- ☐ **Agency was in noncompliance with grantee requirements for LIHEAP -**
- ☐ **Agency is under criminal investigation**
- ☐ **Added agency**
- ☐ **Agency closed**
- ☐ **Other - describe**

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 9: Energy Suppliers, 2605(b)(7) - Assurance 7

9.1 Do you make payments directly to home energy suppliers?

Heating	○ Yes	◉ No
Cooling	○ Yes	◉ No
Crisis	○ Yes	◉ No
Are there exceptions?	○ Yes	◉ No

If yes, Describe.

9.2 How do you notify the client of the amount of assistance paid?

During the intake process, eligible entities inform the client of their assistance amount and provide them a copy of the voucher created from the statewide database.

9.3 How do you 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?

The vendor shall 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. The vendor agreement attached is an arrangement between the energy supplier and the eligible entity. The eligible entity is responsible for making direct payments to the vendor on behalf of the customer. Eligible customers are notified of the award amount at the time of application and a voucher is created via the statewide database. The state office (OEO) does not make payments directly to home energy suppliers. However, the validity of charges and payments are monitored by OEO.

9.4 How do you assure that no household receiving assistance under this title will be treated adversely because of their receipt of LIHEAP assistance?

The State prohibits any difference in treatment to households because of their receipt of LIHEAP assistance. This prohibition is reflected on the customer application and the statewide Vendor Agreement.

9.5. Do you make payments contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households?

○ Yes ◉ No

If so, describe the measures unregulated vendors may take.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10)

10.1. How do you ensure good fiscal accounting and tracking of LIHEAP funds?

The State maintains the internal controls and financial management system necessary to accurately account for LIHEAP expenditures; both fiscally and programmatically. OEO's fiscal team initially reviews and approves budget applications, then closely monitors comprehensive expenditure reports and monthly financial status reports prepared/submitted by Subgrantees. Technical assistance and fiscal training are ongoing for agency fiscal officers and staff.

Audit Process

10.2. Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133?

○ Yes ◉ No

10.3. Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year.

No Findings ☐

Finding	Type	Brief Summary	Resolved?	Action Taken
1	reporting	Numbers transposed on LIHEAP Household Report.	Yes	procedure/policy changes

10.4. Audits of Local Administering Agencies

What types of annual audit requirements do you have in place for local administering agencies/district offices? Select all that apply.

- ☑ **Local agencies/district offices are required to have an annual audit in compliance with Single Audit Act and OMB Circular A-133**
- ☑ **Local agencies/district offices are required to have an annual audit (other than A-133)**
- ☑ **Local agencies/district offices' A-133 or other independent audits are reviewed by Grantee as part of compliance process.**
- ☑ **Grantee conducts fiscal and program monitoring of local agencies/district offices**

Compliance Monitoring

10.5. Describe the Grantee's strategies for monitoring compliance with the Grantee's and Federal LIHEAP policies and procedures: Select all that apply

Grantee employees:

- ☑ **Internal program review**
- ☑ **Departmental oversight**
- ☑ **Secondary review of invoices and payments**
- ☐ **Other program review mechanisms are in place. Describe:**

Local Administering Agencies / District Offices:

- [x] **On - site evaluation**
- [x] **Annual program review**
- [x] **Monitoring through central database**
- [x] **Desk reviews**
- [x] **Client File Testing / Sampling**
- [x] **Other program review mechanisms are in place. Describe:**

Monthly financial and household reports; quarterly vendor interaction reports; annual cumulative financial and household reports.

10.6 Explain, or attach a copy of your local agency monitoring schedule and protocol.

To assure the accomplishment of program outcomes and grant compliance, the OEO will monitor each Subgrantee a minimum of one time per three program years. Monitoring visits will be scheduled and confirmation letters will be forwarded to the Subgrantee at least one month prior to the scheduled visit.

The OEO may conduct monitoring through a team visit. The team or individuals visiting Subgrantees will prepare a summary of the field visit and monitoring report upon return to the OEO. Subsequently, the monitoring report will be forwarded to the Subgrantee, with a copy to the Chairman of the Board of Directors, and will address any deficiencies identified during the field visit. (Copies of the monitoring report will be forwarded to the entire Board of Directors when there are major issues to be addressed.) Each Subgrantee will have a specific period of time to correct the deficiencies identified, if applicable. Major findings will be tracked by OEO to final resolution. Uncorrected deficiencies may result in contract suspension or possible termination in accordance with established policies.

Monitoring Report Timeline:

Following the exit conference, the CAA has five (5) business days to provide pending information requested by OEO to resolve outstanding monitoring concerns.

Following the exit conference, OEO has twenty-five (25) calendar days to issue a draft report to the CAA.

From the date of receipt, the CAA has ten (10) calendar days to respond to OEO's report.

Finally, OEO has twenty (20) calendar days to issue a final report, including the CAA's rebuttals.

Note: If the deadline falls on a holiday or weekend, the deadline will be extended to the next business day.

(Monitoring schedule attached)

10.7. Describe how you select local agencies for monitoring reviews.

Site Visits:

OEO provides program and fiscal monitoring for each agency, at least once every three program years. Additional monitoring will be imposed by the state if severe deficiencies are identified. As a best practice, OEO makes the effort to monitor annually.

Desk Reviews:

Fiscal monitoring staff perform a desk monitirng of all subgrantees in addition to the on-site monitoring to assist in identifying potential issues, opportunities for training and technical assistance, and areas to focus on during the on-site monitoring. A desk review is also performed on the subgrantees single audit with a management decision issued when required.

10.8. How often is each local agency monitored ?

Each agency is monitored at least once every three (3) program years. As a best practice, OEO makes the effort to monitor annually.

10.9. What is the combined error rate for eligibility determinations? OPTIONAL

10.10. What is the combined error rate for benefit determinations? OPTIONAL

10.11. How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues? 0

10.12. How many local agencies are currently on corrective action plans for financial accounting or administrative issues? 0

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Section 11: Timely and Meaningful Public Participation, 2605(b)(12), 2605(C)(2)

11.1 How did you obtain input from the public in the development of your LIHEAP plan?
Select all that apply.

- [x] Tribal Council meeting(s)
- [x] Public Hearing(s)
- [x] Draft Plan posted to website and available for comment
- [x] Hard copy of plan is available for public view and comment
- [x] Comments from applicants are recorded
- [x] Request for comments on draft Plan is advertised
- [x] Stakeholder consultation meeting(s)
- [x] Comments are solicited during outreach activities
- [ ] Other - Describe:

11.2 What changes did you make to your LIHEAP plan as a result of this participation?

State plans were issued to the Community Action network May 9, 2019 to provide ample time for review and edits/comments. OEO hosted community partners and eligible entities during a one-day conference to review the plan (June 13, 2019) and allow for additional feedback and suggestions. Following the review, additional time was permitted to provide further comments prior to and during the Public Hearing. It was decided that South Carolina will not engage in Assurance 16 activities in 2020 nor provide HVAC/heat pump repairs/installations.

Public Hearings, 2605(a)(2) - For States and the Commonwealth of Puerto Rico Only

11.3 List the date and location(s) that you held public hearing(s) on the proposed use and distribution of your LIHEAP funds?

	Date	Event Description
1	08/09/2019	Public Hearing at 1205 Pendleton Street, Edgar Brown Building, Room 364, Columbia, SC

11.4. How many parties commented on your plan at the hearing(s)? 0

11.5 Summarize the comments you received at the hearing(s).

N/A

11.6 What changes did you make to your LIHEAP plan as a result of the comments received at the public hearing(s)?

N/A

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Section 12: Fair Hearings, 2605(b)(13) - Assurance 13

12.1 How many fair hearings did the grantee have in the prior Federal fiscal year? 0

12.2 How many of those fair hearings resulted in the initial decision being reversed? 0

12.3 Describe any policy and/or procedural changes made in the last Federal fiscal year as a result of fair hearings?

N/A

12.4 Describe your fair hearing procedures for households whose applications are denied.

An OEO-approved Appeal and Fair Hearing notice must be posted in the lobbies and at intake sites where LIHEAP applications are taken. OEO verifies this during site visits and with the submission of the agency's Community Action Plan for LIHEAP.

Denials: Applicants who assert being unfairly treated, denied assistance and/or services must be informed at the time of application of the reason for denial. Such notification must clearly cite the reason for denial. The applicant has the right to appeal/request an official hearing within 30 days of the date of denial. A Notice of Denial can be issued when: applicant is refused access to services and financial assistance; applicant does not fulfill his/her obligations to program participatory requirements or exceeds the income eligibility requirement; applicant does not provide sufficient information to complete his/her application or has knowingly provided false and/or misleading information; applicant has maxed out his/her eligibility for program assistance during the program year; funds are exhausted; applicant has not met the time restraints on program availability (e.g. between LIHEAP heating and cooling periods).

Levels of Appeal

- Applicants should first file a written appeal with the Community Action Agency in which he/she applied for service(s), requesting a formal hearing within 30 calendar days of the agency's Notice of Denial of Assistance/Services.
- If the appeal is denied at the Community Action Agency, the applicant may file a written appeal to the Office of Economic Opportunity (OEO) within 20 calendar days of the agency's notification of their hearing decision. The written appeal shall be submitted to:

  Attention: Legal Counsel

  The South Carolina Department of Administration

  Office of Economic Opportunity

  1205 Pendleton Street, Suite 366

  Columbia, SC 29201
- If the appeal is further denied by OEO, the applicant may file a written appeal within 20 calendar days of the applicant's receipt of OEO's written hearing decision. The Department of Administration's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within 30 days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act.

The funds or services in question must be obligated (set aside) until a final decision is reached. If the applicant is successful, the funds or services will be provided to the applicant. If the applicant is unsuccessful, funds are to be reverted to Client Assistance and made available to eligible participants.

12.5 When and how are applicants informed of these rights?

An OEO-approved Appeal and Fair Hearing notice must be posted in the lobbies and at intake sites where LIHEAP applications are taken. The State verifies the posting during site visits. In addition to the

notice posted at each intake site, the fair hearing notice appears on the statewide application and OEO's website.

12.6 Describe your fair hearing procedures for households whose applications are not acted on in a timely manner.

Eligible entities are required to make determinations and provide notification of eligibility decisions on applications for nonemergency LIHEAP benefits within 30 business days after the filing of application with all required documents. For emergency LIHEAP assistance, the agency is required to determine eligibility within 18 to 48 hours upon the receipt of all required documents necessary for application. Individuals whose applications are not acted upon within the established timeframes may appeal at the agency and state level.

- **Applicants should first file a written appeal with the Community Action Agency in which he/she applied for service(s), requesting a formal hearing within 30 calendar days of the agency's Notice of Denial of Assistance/Services.**

- **If the appeal is denied at the Community Action Agency, the applicant may file a written appeal to the Office of Economic Opportunity (OEO) within 20 calendar days of the agency's notification of their hearing decision. The written appeal shall be submitted to:**

Attention: Legal Counsel

The South Carolina Department of Administration

Office of Economic Opportunity

1205 Pendleton Street, Suite 366

Columbia, SC 29201

- **If the appeal is further denied by OEO, the applicant may file a written appeal within 20 calendar days of the applicant's receipt of OEO's written hearing decision. The Department of Administration's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within 30 days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act.**

OEO will also provide training and technical assistance to agencies whose applications fail to be processed in a timely manner. OEO verifies applications are processed in a timely manner during monitoring.

12.7 When and how are applicants informed of these rights?

An Appeal and Fair Hearing notice must be posted in the lobbies and at intake sites where LIHEAP applications are taken. The notice outlines the escalation process for appeals, beginning with the serving agency. Applicants are also informed of their right to appeal on the statewide application and OEO's website.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 13: Reduction of home energy needs, 2605(b)(16) - Assurance 16

13.1 Describe how you use LIHEAP funds to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance?

N/A

13.2 How do you ensure that you don't use more than 5% of your LIHEAP funds for these activities?

N/A

13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year.

N/A

13.4 Describe the level ofdirect benefitsprovided to those households in the previous Federal fiscal year.

N/A

13.5 How many households applied for these services? 0

13.6 How many households received these services? 0

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Section 14:Leveraging Incentive Program, 2607(A)

14.1 Do you plan to submit an application for the leveraging incentive program?

○ Yes ◉ No

14.2 Describe instructions to any third parties and/or local agencies for submitting LIHEAP leveraging resource information and retaining records.

14.3 For each type of resource and/or benefit to be leveraged in the upcoming year that will meet the requirements of45 C.F.R. § 96.87(d)(2)(iii), describe the following:

Resource	What is the type of resource or benefit ?	What is the source(s) of the resource ?	How will the resource be integrated and coordinated with LIHEAP?
1			

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Section 15: Training

15.1 Describe the training you provide for each of the following groups:

a. Grantee Staff:

- [x] **Formal training on grantee policies and procedures**

How often?

- [x] **Annually**
- [ ] **Biannually**
- [x] **As needed**
- [x] **Other - Describe:** new employees as hired

- [x] **Employees are provided with policy manual**
- [x] **Other-Describe:**

Additional Federal training is requested per the needs of the State.

b. Local Agencies:

- [x] **Formal training conference**

How often?

- [ ] **Annually**
- [x] **Biannually**
- [x] **As needed**
- [x] **Other - Describe:** upon request

- [x] **On-site training**

How often?

- [ ] **Annually**
- [ ] **Biannually**
- [x] **As needed**
- [x] **Other - Describe:** upon request and as mandated by the State

- [x] **Employees are provided with policy manual**
- [ ] **Other - Describe**

c. Vendors

- [x] **Formal training conference**

How often?

- [ ] **Annually**
- [x] **Biannually**
- [x] **As needed**

- [x] **Other - Describe:** As requested
- [x] **Policies communicated through vendor agreements**
- [ ] **Policies are outlined in a vendor manual**
- [ ] **Other - Describe:**

15.2 Does your training program address fraud reporting and prevention?

- (•) Yes
- ( ) No

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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Section 16: Performance Goals and Measures, 2605(b) - Required for States Only

16.1 Describe your progress toward meeting the data collection and reporting requirements of the four required LIHEAP performance measures. Include timeframes and plans for meeting these requirements and what you believe will be accomplished in the coming federal fiscal year.

South Carolina plans to continue collecting data from two of the state's largest electric and natural gas utilities. Additionally, we will target propane vendors and other utilities to ensure a more accurate account of customer energy consumption and costs. Performance measures data will be used to evaluate the effectiveness of South Carolina's benefit matrix.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES

August 1987, revised 05/92,02/95,03/96,12/98,11/01
OMB Clearance No.: 0970-0075
Expiration Date: 09/30/2020

LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN
SF - 424 - MANDATORY

Section 17: Program Integrity, 2605(b)(10)

17.1 Fraud Reporting Mechanisms

a. Describe all mechanisms available to the public for reporting cases of suspected waste, fraud, and abuse. Select all that apply.

- [x] **Online Fraud Reporting**
- [ ] **Dedicated Fraud Reporting Hotline**
- [x] **Report directly to local agency/district office or Grantee office**
- [x] **Report to State Inspector General or Attorney General**
- [x] **Forms and procedures in place for local agencies/district offices and vendors to report fraud, waste, and abuse**
- [x] **Other - Describe:**

  Each agency provides an annual LIHEAP Integrity Plan to address fraud, waste and abuse.

b. Describe strategies in place for advertising the above-referenced resources. Select all that apply

- [ ] **Printed outreach materials**
- [x] **Addressed on LIHEAP application**
- [x] **Website**
- [ ] **Other - Describe:**

17.2. Identification Documentation Requirements

a. Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.

Type of Identification Collected	Collected from Whom?					
	Applicant Only		All Adults in Household		All Household Members	
Social Security Card is photocopied and retained	[ ]	Required	[ ]	Required	[x]	Required
	[ ]	Requested	[ ]	Requested	[ ]	Requested
Social Security Number (Without actual Card)	[ ]	Required	[ ]	Required	[ ]	Required
	[ ]	Requested	[ ]	Requested	[ ]	Requested
Government-issued identification card	[x]	Required	[ ]	Required	[ ]	Required

(i.e.: driver's license, state ID, Tribal ID, passport, etc.)	☐	Requested	☐	Requested	☐	Requested

	Other	Applicant Only Required	Applicant Only Requested	All Adults in Household Required	All Adults in Household Requested	All Household Members Required	All Household Members Requested
1	Official proof for disabled persons to be considered vulnerable and receive additional benefits	☐	☐	☐	☐	☑	☐
2	Official proof for veterans to be considered to receive additional non-emergency benefits	☐	☐	☐	☐	☑	☐

b. Describe any exceptions to the above policies.

Green cards/proof of right to work in the state is allowed for foreign naturals. Elderly and/or homebound applicants may qualify for a waiver if documents cannot be provided (no exception for proof of disabled status). If a Social Security card is not available, the state will accept a Social Security number printed on a government issued document.

17.3 Identification Verification

Describe what methods are used to verify the authenticity of identification documents provided by clients or household members. Select all that apply

- ☑ **Verify SSNs with Social Security Administration**
- ☑ **Match SSNs with death records from Social Security Administration or state agency**
- ☑ **Match SSNs with state eligibility/case management system (e.g., SNAP, TANF)**
- ☐ **Match with state Department of Labor system**
- ☐ **Match with state and/or federal corrections system**
- ☐ **Match with state child support system**
- ☐ **Verification using private software (e.g., The Work Number)**
- ☐ **In-person certification by staff (for tribal grantees only)**
- ☐ **Match SSN/Tribal ID number with tribal database or enrollment records (for tribal grantees only)**
- ☐ **Other - Describe:**

17.4. Citizenship/Legal Residency Verification

What are your procedures for ensuring that household members are U.S. citizens or aliens who are qualified to receive LIHEAP benefits? Select all that apply.

- ☑ **Clients sign an attestation of citizenship or legal residency**
- ☑ **Client's submission of Social Security cards is accepted as proof of legal residency**
- ☑ **Noncitizens must provide documentation of immigration status**
- ☑ **Citizens must provide a copy of their birth certificate, naturalization papers, or passport**
- ☐ **Noncitizens are verified through the SAVE system**
- ☐ **Tribal members are verified through Tribal enrollment records/Tribal ID card**
- ☐ **Other - Describe:**

17.5. Income Verification

What methods does your agency utilize to verify household income? Select all that apply.

- ☑ **Require documentation of income for all adult household members**
  - ☑ **Pay stubs**
  - ☑ **Social Security award letters**
  - ☐ **Bank statements**
  - ☑ **Tax statements**

- [x] Zero-income statements
- [x] Unemployment Insurance letters
- [x] Other - Describe:

  DSS statements, Utility check copies

- [ ] Computer data matches:
  - [ ] Income information matched against state computer system (e.g., SNAP, TANF)
  - [ ] Proof of unemployment benefits verified with state Department of Labor
  - [ ] Social Security income verified with SSA
  - [ ] Utilize state directory of new hires
  - [ ] Other - Describe:

17.6. Protection of Privacy and Confidentiality

Describe the financial and operating controls in place to protect client information against improper use or disclosure. Select all that apply.

- [x] Policy in place prohibiting release of information without written consent
- [x] Grantee LIHEAP database includes privacy/confidentiality safeguards
- [x] Employee training on confidentiality for:
  - [x] Grantee employees
  - [x] Local agencies/district offices
- [x] Employees must sign confidentiality agreement
  - [ ] Grantee employees
  - [x] Local agencies/district offices
- [x] Physical files are stored in a secure location
- [x] Other - Describe:

  Policy and procedures manuals and contract outline requirements

17.7. Verifying the Authenticity

What policies are in place for verifying vendor authenticity? Select all that apply.

- [ ] All vendors must register with the State/Tribe.
- [x] All vendors must supply a valid SSN or TIN/W-9 form
- [x] Vendors are verified through energy bills provided by the household
- [x] Grantee and/or local agencies/district offices perform physical monitoring of vendors
- [ ] Other - Describe and note any exceptions to policies above:

17.8. Benefits Policy - Gas and Electric Utilities

What policies are in place to protect against fraud when making benefit payments to gas and electric utilities on behalf of clients? Select all that apply.

- [x] Applicants required to submit proof of physical residency
- [x] Applicants must submit current utility bill
- [x] Data exchange with utilities that verifies:
  - [x] Account ownership
  - [x] Consumption
  - [x] Balances
  - [x] Payment history
  - [x] Account is properly credited with benefit
  - [ ] Other - Describe:

- [x] Centralized computer system/database tracks payments to all utilities
- [x] Centralized computer system automatically generates benefit level
- [x] Separation of duties between intake and payment approval
- [x] Payments coordinated among other energy assistance programs to avoid duplication of payments
- [x] Payments to utilities and invoices from utilities are reviewed for accuracy
- [ ] Computer databases are periodically reviewed to verify accuracy and timeliness of payments made to utilities
- [ ] Direct payment to households are made in limited cases only
- [x] Procedures are in place to require prompt refunds from utilities in cases of account closure
- [x] Vendor agreements specify requirements selected above, and provide enforcement mechanism
- [ ] Other - Describe:

17.9. Benefits Policy - Bulk Fuel Vendors

What procedures are in place for averting fraud and improper payments when dealing with bulk fuel suppliers of heating oil, propane, wood, and other bulk fuel vendors? Select all that apply.

- [x] Vendors are checked against an approved vendors list
- [x] Centralized computer system/database is used to track payments to all vendors
- [x] Clients are relied on for reports of non-delivery or partial delivery
- [x] Two-party checks are issued naming client and vendor
- [ ] Direct payment to households are made in limited cases only
- [x] Vendors are only paid once they provide a delivery receipt signed by the client
- [x] Conduct monitoring of bulk fuel vendors
- [ ] Bulk fuel vendors are required to submit reports to the Grantee
- [x] Vendor agreements specify requirements selected above, and provide enforcement mechanism
- [ ] Other - Describe:

17.10. Investigations and Prosecutions

Describe the Grantee's procedures for investigating and prosecuting reports of fraud, and any sanctions placed on clients/staff/vendors found to have committed fraud. Select all that apply.

- [x] Refer to state Inspector General
- [ ] Refer to local prosecutor or state Attorney General
- [x] Refer to US DHHS Inspector General (including referral to OIG hotline)
- [x] Local agencies/district offices or Grantee conduct investigation of fraud complaints from public
- [ ] Grantee attempts collection of improper payments. If so, describe the recoupment process
- [x] **Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned?** 1 year to permanent debarment depending upon severity of fraudulent activity.
- [x] Contracts with local agencies require that employees found to have committed fraud are reprimanded and/or terminated
- [x] Vendors found to have committed fraud may no longer participate in LIHEAP
- [ ] Other - Describe:

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters

Certification Regarding Debarment, Suspension, and Other Responsibility Matters--Primary Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.BrBbr.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled ``Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction,"

provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters--Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an

explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, [[Page 33043]] should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled ``Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction,'' without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require

establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility an Voluntary Exclusion--Lower Tier Covered Transactions

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

☑ **By checking this box, the prospective primary participant is providing the certification set out above.**

Section 19: Certification Regarding Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central pint is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. For grantees other than individuals, Alternate I applies.

4. For grantees who are individuals, Alternate II applies.

5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).

7. If the workplace identified to the agency changes during the performance of

the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance **means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);**

Conviction **means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;**

Criminal drug statute **means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;**

Employee **means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).**

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)
The grantee certifies that it will or will continue to provide a drug-free workplace by:,

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
(b) Establishing an ongoing drug-free awareness program to inform employees about --
(1)The dangers of drug abuse in the workplace;
(2) The grantee's policy of maintaining a drug-free workplace;
(3) Any available drug counseling, rehabilitation, and employee assistance

programs; and
(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
(1) Abide by the terms of the statement; and
(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
(e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
(f)Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted -(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
(B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

1205 Pendleton Street * Address Line 1		
Address Line 2		
Address Line 3		
Columbia * City	SC * State	29201 * Zip Code

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

☑ **By checking this box, the prospective primary participant is providing the certification set out above.**

Section 20: Certification Regarding Lobbying

The submitter of this application certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ``Disclosure Form to Report Lobbying," in accordance with its instructions

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ``Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or

entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

☑ **By checking this box, the prospective primary participant is providing the certification set out above.**

Assurances

(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 150 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 disbursal 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.

*** This assurance is applicable only to States, and to territories whose annual regular LIHEAP allotments exceed $200,000. Neither territories with annual allotments of $200,000 or less nor Indian tribes/tribal organizations are subject to Assurance 15.**

(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.

Plan Attachments

PLAN ATTACHMENTS
The following documents must be attached to this application
• **Delegation Letter is required if someone other than the Governor or Chairman Certified this Report.**
• **Heating component benefit matrix, if applicable**
• **Cooling component benefit matrix, if applicable**
• **Minutes, notes, or transcripts of public hearing(s).**

List of Cell Level Attachments

	File Name	Location
1	McMaster_ 2020 LIHEAP.pdf	Mandatory Grant Application SF-424 Attach supporting documents as specified in agency instructions.
2	2018 LIHEAP Delegation Letter Miller.pdf	Mandatory Grant Application SF-424 Attach supporting documents as specified in agency instructions.
3	2020 LIHEAP Benefit Matrix.pdf	Section 2 - HEATING ASSISTANCE **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
4	Guidance on Equipment Repairs and Replacement_2020.pdf	Section 4 - CRISIS ASSISTANCE **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
5	SC OEO Policies on LIHEAP Entity Designation_2020.pdf	Section 8 - Agency Designation,, 2605(b)(6) - Assurance 6 **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
6	Statewide Vendor Agreement 12. 4.18.pdf	Section 9 - Energy Suppliers,, 2605(b)(7) - Assurance 7 **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
7	2020 Monitoring Schedule.pdf	Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10 **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
8	Fiscal Guidance and Procedural Manual April 2019.pdf	Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10 **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
9	OEO State Guide to Monitoring Protocol .pdf	Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10 **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
10	2020 State Plan Review 613.19_ All docs.pdf	Section 11 - Timely and Meaningful Public Participation, , 2605(b)(12) - Assurance 12, 2605(c)(2) **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
11	Public Hearing_The State Newspaper _Receipt of Advertisement.pdf	Section 11 - Timely and Meaningful Public Participation, , 2605(b)(12) - Assurance 12, 2605(c)(2) **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
12	2020 Public Hearing Sign In Sheet	Section 11 - Timely and Meaningful Public Participation, ,

	8.9.19.pdf	2605(b)(12) - Assurance 12, 2605(c)(2) **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**
13	FY 2020 Public Hearing Transcript.pdf	Section 11 - Timely and Meaningful Public Participation, , 2605(b)(12) - Assurance 12, 2605(c)(2) **If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.**

HENRY MCMASTER
GOVERNOR

July 3, 2019

Mr. Clarence H. Carter
Acting Director of the Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

Dear Mr. Carter,

I hereby designate Mr. James E. Miller, Director of the Office of Economic Opportunity, to sign South Carolina's annual application and certifications for the Low Income Home Energy Assistance Program (LIHEAP). Mr. Miller is authorized to sign assurances and to administer the 2020 LIHEAP grant in the State of South Carolina.

Thank you for your time and consideration. If you have any questions, please contact Mr. Miller at 803.734.0425.

Yours very truly,

Henry McMaster

cc: Mr. James Miller, Director, Office of Economic Opportunity

HM/ll

STATE HOUSE • 1100 GERVAIS STREET • COLUMBIA, SOUTH CAROLINA 29201 • TELEPHONE: 803-734-2100

HENRY MCMASTER
GOVERNOR

July 3, 2019

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HM/ll

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admin
THE SOUTH CAROLINA
DEPARTMENT of ADMINISTRATION

Henry McMaster, *Governor*
Marcia S. Adams, *Executive Director*

OFFICE of ECONOMIC OPPORTUNITY
James Miller, Director
1205 Pendleton Street, Suite 349
Columbia, SC 29201
803.734.0662
803.734.0356 Fax

September 20, 2017

J. Janelle George
Acting Director
Office of Community Services
Administration for Children and Families
370 L'Enfant Promenade, S.W., 5th Floor West
Washington, D.C. 20447

Dear Ms. George,

I, James E. Miller, Director of South Carolina's Department of Administration Office of Economic Opportunity, delegate my authority to the Senior Manager to certify the assurances outlined in the Low Income Home Energy Assistance Program, as amended, and otherwise perform all necessary functions to properly administer the Low Income Home Energy Assistance Program, with the exception of signing for grant funds. Furthermore, in the absence of the Senior Manager, I authorize OEO's Auditor to submit the 2018 LIHEAP Model Plan application for South Carolina and to certify the assertions required to submit the application.

If you have any questions or concerns, please contact me at your earliest convenience. I may be reached at 803-734-0425 or by email at james.miller@admin.sc.gov.

Sincerely,

James E. Miller
Director

admin
THE SOUTH CAROLINA
DEPARTMENT of ADMINISTRATION

20 Benefit Matrix

Low Income Home Energy Assistance Program (LIHEAP) Block Grant

Maximum Income Eligibility based on 150% of the Federal Poverty Level:

FAMILY SIZE	150% MONTHLY POVERTY GUIDELINE	150% ANNUAL POVERTY GUIDELINE
1	$1,561.25	$18,735.00
2	$2,113.75	$25,365.00
3	$2,666.25	$31,995.00
4	$3,218.75	$38,625.00
5	$3,771.25	$45,255.00
6	$4,323.75	$51,885.00
7	$4,876.25	$58,515.00
8	$5,428.75	$65,145.00
For each additional person, add	$553.00	$6,630.00

***Special Note:** Federal Register notice of the 2019 poverty guidelines published January 11, 2019. 2020 FPLs will be updated as issued.*

Crisis Assistance Benefits (Electric and Non-electric Vendors)

Maximum FPL:	*Vulnerable Household*	*Non-vulnerable Household*
150%	Up to $1,000.00	Up to $1,000.00

Non-Emergency Benefits (Electric and Non-electric Vendors)

South Carolina's non-emergency LIHEAP benefit matrix is intended to provide vulnerable and high burden households the highest non-emergency LIHEAP benefit to offset the cost of home heating/cooling expenses. Each eligible household receives a minimum non-emergency benefit of $300. Additional benefits are awarded if the household/a member of the household is: elderly ($75); disabled ($50); household income 100% of the FPL or less ($75); child age 5 or under ($50); household energy burden is demonstrated ((20% or more of income used for utilities) $75); heats with fuel ($75); a veteran ($50). The maximum non-emergency benefit during the heating season is $750. The maximum non-emergency benefit during the cooling season is $675 (no fuel benefit awarded May 1 – September 30).

Maximum FPL:	*Description*	*Vulnerable Household*	*Non-Vulnerable Household*
150%	**Minimum Benefit**	**$300**	**$300**
150 %	Child Age 5 or <	$50	-
150%	Energy Burden	$75	$75
150%	Elderly, Age 60+	$75	-
150%	Disabled	$50	-
100%	Income <100%	$75	-

150%	Fuel	$75	$75
150%	Veteran	$50	$50
		Maximum Non-Emergency Heating Award:	**$750.00**
		Maximum Non-Emergency Cooling Award:	**$675.00**

VULNERABLE HOUSEHOLDS DEFINED

(1) Elderly - Individuals age 60 years or older.

(2) Disabled – Individuals must provide proof of disability. Proof of disability is to be provided from a current year's award letter or SSI report from the Social Security Administration (SSA) verifying disability, a current year's letter from Vocational Rehabilitation or the Veterans Administration, Disability Income Check, or an official handicapped sticker bearing the appropriate photograph. Disability may be either temporary or permanent. This medical documentation must be attached to the application on file.

(3) Income is at 100% of the FPG or less - Total household income for the last 30 days, including the date of application must be at or below 100% of the FPG. Reference the current program year's Federal Poverty Income Guidelines.

(4) Household with Children Age 5< - One or more children living in household age 5 or younger.

(5) Energy Burden – An Energy Burden must be calculated using only the current month's home energy cost (ex. kWh or Therms). To determine the Energy Burden for electric households, multiply total monthly household income by 20% (.20) = PRODUCT. Because fuel expands, tanks and cylinders are never filled to the maximum size of the tank. Instead, tanks are only filled to about 80 to 85 percent of their capacity. **To determine the Energy Burden for fuel customers, multiply the cost to fill the customer's tank by 80%.** If the current energy bill is higher than the PRODUCT, then an energy burden has been demonstrated. The current home energy cost should exclude all non-utility and unallowable charges.

(6) Fuel – According to the LIHEAP Performance Measures, fuel is defined as Natural Gas, Fuel Oil/Kerosene or Propane (LPG – liquefied petroleum gas). For an additional benefit, the household must heat with one of the fuels mentioned above. Proof of fuel service must be in the file.

(7) Veterans - Individuals must provide proof of veteran status. Documentation must be in the customer's file.

admin
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Low-Income Home Energy Assistance Program

EQUIPMENT REPAIR OR REPLACEMENT

Under ECIP, as funds are available, to sustain the winter cold or summer heat, home heating/cooling window units may be repaired or replaced up to a maximum of $1,400. Most agencies support this level of assistance particularly for vulnerable households on fixed incomes (elderly, disabled, and those with young children) where discretionary income for this level of expense is inadequate.

Procurement for system repair and/or replacement must follow the OEO Procurement Policy (OEO Fiscal Guidance and Procedural Manual). OEO requires hiring a certified, licensed mechanical contractor for installations and/or repairs. **A current contractor's agreement must be on file**. Agencies can coordinate with the vendor or Weatherization program. The proper number of bids must be secured and maintained in the file reflecting a common scope of work. Agencies do not have to take the lowest priced bid, but file documentation is to indicate awards for reasonable and prudent statements of work as compared with price. **Agencies may also choose to contract with more than one vendor.**

Each agency will be monitored on this component as outlined and approved in the current year's Community Action Plan. **Client and installer are to sign off on a receipt of service form to validate the customer received an operable unit, was provided warranty and operating instructions. A copy of the receipt, bids and invoices are to be placed in client's file.**

Note: Section 2604(c)(1)(2) of the LIHEAP Statute requires 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. And 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.

Approved heaters/fans may be provided as an emergency intervention when repair/replacement is not possible within 18 or 48 hours using CSBG funds.

admin
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DESIGNATION/RE-DESIGNATION OF (NEW) LIHEAP ELIGIBLE ENTITIES

South Carolina Code of Laws SECTION 58-37-50 "(a) the Low Income Home Energy Assistance Program (LIHEAP), created by Title XXVI of the Omnibus Budget Reconciliation Act of 1981 and codified as Chapter 94, Title 42 of the United States Code, as amended by the Human Services Reauthorization Act of 1984, the Human Services Reauthorization Act of 1986, the Augustus F. Hawkins Human Services Reauthorization Act of 1990, the National Institutes of Health Revitalization Act of 1993, the Low Income Home Energy Amendments of 1994, the Coats Human Services Reauthorization Act of 1998, and the Energy Policy Act of 2005 which is administered and funded by the United States Department of Health and Human Services on the federal level **and administered locally by community action agencies."**

The existing Community Action Agencies (CAAs) in South Carolina are eligible entities which receive LIHEAP funding to assists low-income households, particularly those with the lowest incomes that pay a high proportion of household income for home energy, primarily in meeting their immediate home energy needs. The OEO may designate a new eligible entity if an area of the state is not served or ceases to be served by an eligible entity. This includes situations where an existing eligible entity goes out of business, is terminated, or relinquishes its designation as an eligible entity. If the State has decided to terminate an eligible entity's LIHEAP funding and the entity has appealed that decision to OCS the state can solicit applications for new eligible entities but cannot award funds to a new entity until OCS confirms the state's decision to terminate or the review period ends.

DESIGNATION/RE-DESIGNATION OF ELIGIBLE ENTITIES IN UNSERVED AREAS

If a county has not been or ceases to be served by an existing CAA under the LIHEAP, the state may at any time initiate a process for the designation of a CAA or other eligible entity.

The procedure for designation shall be as follows:

1. The State will notify in writing and request written applications from:
   (a) Any private nonprofit organization that is geographically located in the unserved area, that can provide a range of services designed to meet the requirements of the LIHEAP Statute; and
   (b) Any private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.
2. Requirement. In order to serve as the area's designated eligible entity, an entity shall agree to add additional members to the board of the entity to ensure adequate representation:
   (a) In each of the three required categories described in the CSBG Act, 42 U.S.C. §9901 *et seq*. by members who reside in the community comprised by the unserved area; and
   (b) In the category relating to low income individuals by members that reside in the neighborhood to be served.
3. Special Consideration. The designation shall be granted to an organization of demonstrated effectiveness in meeting the goals and purposes of LIHEAP. Priority may be given to eligible entities that are providing related services in the unserved area.

SOUTH CAROLINA LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)
VENDOR AGREEMENT

This Vendor Agreement shall govern certain activities of the Low-Income Home Energy Assistance Program, hereinafter referred to as LIHEAP, which are to be carried out by the Vendor identified on the signature page of this Agreement, hereinafter referred to as the Vendor, as a condition of receipt of payment, and the Community Action Agency; hereinafter referred to as the CAA.

The_____and the Vendor agree to the following:
(Community Action Agency)

A. SERVICES TO BE PERFORMED

1. The Vendor shall 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.
2. The Vendor is required to verify the account holder's name and/or household member(s), account number, current balance on account and signature upon receipt of the energy voucher prior to crediting the customer's account.
3. The Vendor will accept the voucher(s) as credit for actual commitment/cash payment for the purchase of home heating fuel or cooling assistance. The Vendor shall specify on the signature page of this Agreement the fuel type to be provided. The Vendor will accept vouchers for the purchase of only the type fuel approved in this Agreement.
4. The Vendor will only deliver fuel to the actual residence of the account holder or credit the account of the account holder as documented on the voucher.
5. If the customer has moved and the energy voucher does not reflect the new address, the Vendor shall not accept the voucher until the customer returns the voucher and requests a change of address from the Community Action Agency (CAA).
6. Vendors are to ensure credit and/or service to approved households within the designated program year.
7. This assistance is provided for households, not individuals. For this reason, no name changes may be made on the energy voucher. The address that appears on the voucher should match the name and address shown on the Vendor records. No alterations of any kind should be made to the voucher.
8. LIHEAP assistance may be used for deposits if specified by the CAA.
9. The parties recognize that each party is bound to act in accordance with their respective bylaws and policies at all times. Nothing in this Agreement is intended or shall be construed to supersede a party's obligations under their respective bylaws and policies or prevent a party from acting in accordance therewith.

B. PROVISIONS UNDER WHICH PAYMENT WILL BE MADE TO VENDORS

1. The Vendor must return this properly executed Vendor Agreement to the CAA prior to being reimbursed.
2. The Vendor must provide a Federal Employer Identification Number (FEIN) or a Social Security number will be acceptable only if the Vendor is an individual and has no FEIN.
    a. If a Vendor provides a Social Security Number, the Vendor must use the proprietor's name, not the company name. If a FEIN is supplied, a company name must be used.
    b. The Vendor shall notify the CAA in writing immediately when the FEIN, Social Security number, business name and/or address changes. Failure to report changes may result in a delay of payments. An IRS W-9 must accompany changes.

3. For fuel oil, propane and/or kerosene, the Vendor shall provide the eligible customer a quantity up to the value of the energy voucher but not to exceed the amount required to fill the tank. A delivery ticket must be submitted for actual payment remittance within 30 days of the delivery.

   a. If the value of the quantity of fuel purchased by a customer is less than the value of the energy voucher, the Vendor shall credit the difference to the customer's account. The credit balance on accounts that equals or exceeds the minimum delivery must be expended each consecutive month until the benefit is exhausted.

   If the value of the quantity of fuel required/purchased by a customer is greater than the energy voucher amount, payment for the remaining balance due must be negotiated between the customer and the Vendor. The CAA will not intervene in these matters.

   b. **The Vendor will not exchange a customer's energy voucher for cash nor will any cash equivalent be given for excess credit.** Violations shall be treated in accordance with Federal and State statutes, to include termination of this Agreement and termination of future services with the Vendor.

   c. When a customer moves from the Vendor's service area, or becomes deceased, and a credit balance remains on that account, the following policies shall apply within the current program year:

      i. Any legal survivors living in the residence of the deceased customer (as listed on the voucher), who were household residents at the time of application, are entitled to use the remaining benefit.

      ii. If there are no remaining legal survivors within the household, any remaining credit balance shall be refunded to the CAA within 30 days of the death or date of last service for the active voucher – whichever comes first.

      iii. Credit balances not used during the current program year (January 1 – December 31) are to be returned to the CAA within 45 days of the close of the grant period.

      iv. Any other circumstances arising shall be dealt with on a case-by-case basis. The Vendor should contact the CAA for additional instruction.

C. PAYMENT PROCEDURES

1. Once the Vendor has honored the energy voucher, as specified herein, the Vendor shall mail the energy voucher(s) to the CAA for payment.

2. Within 30 days of the date of the receipt of the energy voucher(s), payment amount equal to the total amount of the energy voucher(s) for electric service received by the CAA will be made to the Vendor. For kerosene, propane, fuel oil and/or wood vendors, payment will be made for the actual amount delivered, not to exceed the voucher amount.

   If a Vendor has not received payment for the energy voucher(s) within 30 days following the submission, the Vendor should contact the CAA and report the delay. In instances of reported delays, the Vendor may also contact the Office of Economic Opportunity (803-734-0662).

3. CAAs will submit an IRS Form 1099 to record payments in excess of $600 to non-incorporated vendors.

4. All properly executed Vendor Agreements must be maintained on file with the CAA and Vendor.

D. MONITORING

1. The Vendor will maintain records documenting the amount of energy assistance that the customer received and the date of receipt for all fuels other than electricity and natural gas. Records are to be maintained for one year after the program year ends.

2. The Vendor shall permit access to records pertaining to the activities engaged in by the Vendor under this Agreement. Such records include energy voucher payment forms or other documents supporting the delivery of services or receipt of payments for services rendered by the Vendor, as well as the amount of sale, customers' names and addresses.

1. The Vendor shall not discriminate against or adversely treat any eligible household regarding terms and conditions of sale, credit, delivery, or service. No discrimination shall be made based on the source(s) of household income. All sources of household income are documented on the Application and then processed, reviewed and approved by an agency representative. Additionally, the State prohibits any discrimination to households because of their receipt of LIHEAP assistance.

2. The Vendor will cooperate with any Federal, State or local investigation, audit or program review.

E. LIABILITY

To the fullest extent permitted by law, each party agrees to indemnify and hold harmless each other, the Office of Economic Opportunity and their agents, and employees from and against all claims, damages, losses, and expenses including but not limited to attorney's fees, arising out of or resulting from, whether directly or indirectly, any default or negligent or wrongful act or omission of each party, its agents, employees, or subcontractors in the performance or non-performance of the work, the enforcement of this agreement, or any other legal action.

Any losses caused by criminal activity, gross negligence and/or malicious intent is excluded from this indemnification section.

F. REPORTING DISCLOSURE

The Vendor will allow the CAA and the Office of Economic Opportunity access to LIHEAP customer's household fuel/utility/energy information for the purpose of State and Federal data reporting, as approved by the customer, via the statewide application for service.

G. AMENDMENTS and INTEGRATION

This Agreement contains the entire agreement of the parties with respect to the subject matter of this Agreement, and supersedes all prior contract, negotiations, agreement and understandings with respect thereto. This Agreement may only by amended by a written document duly executed by all parties.

H. TERMINATION

1. Either the CAA or the Vendor may terminate this Agreement by giving the other party at least 30 days written notice.

2. This Agreement will terminate immediately should the Vendor supply false information or attempt to defraud the CAA or the eligible customer. In such cases, no additional reimbursement will be made to the Vendor until such matter is resolved.

In witness hereto, the CAA and the Vendor have executed this Agreement on this_____day of _____, 20_____.

VENDOR: Complete Section 1-9. Do not leave anything blank.
Vendor must provide physical address or agreement is void.

1. _____
(Business or Vendor Name)

2. _____
(Mailing Address – Include City, State and Zip Code)

3. _____
(Street Address – Include City, State and Zip Code)

4. _____
(Area Code and Telephone Number)

5. VENDOR DOCUMENTATION

The Vendor must provide a Federal Employment Identification Number (FEIN), or, if you do not have a FEIN, a Social Security number (SSN) will be acceptable only if used with the proprietor's name (e.g. Hallman's Wood – (FEIN) or Mark Hallman (SSN).

Federal Employer Identification Number_____or

Social Security Number _____

6. Fuel Type – Circle all Types of Fuel Provided.

Fuel Oil	**Electricity**
Kerosene	**Wood**
Propane Gas	**Coal**
Natural Gas	**Landlord or Building Operator Who Provides Heat to Tenants**

7. Check all that apply:

- ☐ **I certify that I am not subject to backup withholding.**
- ☐ **I certify that the mailing address on file is correct and current.**
- ☐ **A W-9 is enclosed as required for new vendor(s), or for existing vendors to report change of address or change in FEIN or Social Security number and/or business name.**

_____	_____
(Print Authorizing CAA Signature)	**(Print Authorizing Vendor Signature)**
_____	_____
(Authorizing Signature)	**(Authorizing Signature)**
_____	_____
(Witness)	**(Witness)**
_____	_____
(Date)	**(Date)**

2020 Monitoring Schedule

Week	Entrance Conference Time	Agency	Fiscal	Program	WAP	Travel Schedule
March 16th	10:00 am	Pee Dee	OEO	OEO		
August 3rd	10:00 am	Wateree	OEO	OEO	OEO	
September 21st	11:00 am	Beaufort/Jasper	OEO	OEO		Split*
July 20th	11:00 am	SHARE	OEO	OEO		
July 6th	10:00 am	Aiken	OEO	OEO	OEO	
March 30th	11:00 am	Darlington	Scott & Co.	OEO		Split*
March 4th	11:00 am	Lowcountry	OEO	OEO	OEO	Split*
June 22nd	10:30 am	Piedmont	Scott & Co.	OEO		
August 24th	10:00 am	OCAB	OEO	OEO	OEO	
August 17th	10:00 am	Carolina CAA	Scott & Co.	OEO	OEO	Split*
June 1st	11:00 am	GLEAMNS	OEO	OEO	OEO	
October 5th	11:00 am	Waccamaw	Scott & Co.	OEO	OEO	
September 7th	10:00 am	Chesterfield/ Marlboro	OEO	OEO	OEO	
October 19th	11:00 am	Palmetto (Charleston County Human Services Commission)	OEO	OEO	OEO	

* Split means that Fiscal will be at the agency Monday through Wednesday, WAP will be at the agency Monday and Tuesday, then in the field the rest of the week, and Program will be at the agency Wednesday through Friday.

admin

THE SOUTH CAROLINA
DEPARTMENT *of* ADMINISTRATION

FISCAL GUIDANCE AND PROCEDURAL MANUAL

(April 2019)

Office of Economic Opportunity
1205 Pendleton Street, Suite 349
Columbia, SC 29201

1. Purpose. The Fiscal Guidance and Procedural Manual (manual) serves to document fiscal requirements and provide guidance to Subgrantees of federal grants administered by the Office of Economic Opportunity (OEO). Every effort has been made to ensure the accuracy of the material in this manual; however, if any discrepancy exists between the language in this manual and in any applicable statute, regulation, or policy issuance, please contact OEO for clarification. This manual establishes general and uniform standards for budgeting, financial reporting, procurement, grant compliance, internal controls, disposal of property and fiscal monitoring. This manual in conjunction with each grant's state plan, grant agreement, work plan, budget and/or all relevant federal and state statutes and regulations will apply to all OEO administered grants. OEO administers the following grants:

    - Community Services Block Grant (CSBG) made available under public law 106-133;
    - Low Income Home Energy Assistance program (LIHEAP) made available under Public Law 105-78;
    - Weatherization Assistance Program (WAP) established under Title IV of the Energy Conservation and Production Act and amended by the National Energy Conservation Policy Act, the Energy Security Act, the Human Services Reauthorization Act of 1984, and the State Energy Efficiency Programs Improvement Act of 1990;
    - Emergency Solutions Grants Program (ESGP) authorized by Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act, 42 USC 11301 (1988); and
    - Project Share funds.

2. Supersession. This manual supersedes all previous policy and procedural manuals distributed by OEO.

3. Applicability and Inclusion of Documents. All Subgrantees are required to adhere to the guidance set forth in this manual in conjunction with all federal, state and local regulations as it relates to each grant and executed grant agreement. Subgrantees shall also refer to the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost and Audit Requirements for Federal Awards, codified at 2 CFR Part 200 and made a part of this manual by reference.

    The U.S. Department of Health and Human Services adopted and codified the Omni Circular at 45 CFR Part 75. The U.S. Department of Energy (DOE) adopted the Omni Circular (see 2 CFR §910), but also chose to expand the definition of non-Federal entity to include for-profit organizations. Regulations specific to for-profit organizations found at 10 CFR part 600 remain applicable to for-profit entities. The U.S. Department of Housing and Urban Development (HUD) adopted 2 CFR Part 200, see 2 CFR §2400.101 and 24 CFR §84.1.

4. Contact Information. If you have any questions or concerns regarding this manual, please contact OEO at 1205 Pendleton Street, Columbia, SC 29201. Other contact information: phone number (803) 734-0662, web address http://oeo.sc.gov/.

5. Effective Date. The guidance and procedures established in this manual will become effective April 2019.

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I. DEFINITIONS

1) **Accrued expenditures** are charges incurred by the Subgrantee during a given period requiring the provision of funds for: 1) goods and other tangible property received; 2) services performed by employees, contractors, Subgrantees, and other payees; and 3) other amounts becoming owed under programs for which no current services or performance is required.

2) **Acquisition cost** is the net invoice price plus any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable. Taxes, transit insurance, freight and installation may be included or excluded in accordance with the Subgrantee's capitalization policy. (2 CFR § 200.2, 45 CFR § 75.2)

3) **Actual budget** refers to the actual federal award for the current program year and any re-allocated prior program year unexpended funds.

4) **Applicable credits** are those receipts, or reduction of expenditures which operate to offset or reduce expense items that are allocable to awards as direct or indirect costs. Typical examples of such transactions are purchase discounts, rebates, or allowances, recoveries or indemnities on losses, insurance refunds, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing or received by the Subgrantee relate to allowable cost, they shall be credited to the federal government either as a cost reduction or cash refund, as appropriate. (2 CFR § 200.406, 45 CFR § 75.406)

5) **Application budget** is the projected funding based on the prior program year's actual federal award used to develop the Subgrantee's initial budget.

6) **Award** means financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money, by the federal government to an eligible recipient. The term does not include technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; or contracts which are required to be entered into and administered under procurement laws and regulations.

7) **Budget** means the financial plan for the project or program that either the federal awarding agency or pass-through entity approves during the award process or in subsequent amendments to the federal award. It may include federal and non-federal shares.

8) **Budget package** consists of all required budget forms as listed in the budget instructions found in DBA and all support documentation. A checklist is included in the budget instructions for Subgrantees to use to ensure completion of the budget package. Budget forms must be signed by the Subgrantee's Executive Director and Board Chair.

9) **Capital expenditure** is the acquisition cost of equipment or expenditures for capital improvements that materially increase the asset's value or useful life. (2 CFR § 200.13, 45 CFR § 75.2)

10) **Carry forward funds** are unused funds, which are transferred to the budget for the following year.

11) **Cash on hand** are funds that are immediately available for spending.

12) **Closeout** is the process by which a federal awarding agency determines that all applicable administrative actions and all required work of the award have been completed by the recipient and federal awarding agency.

13) **Computing devices** are machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information.

14) **Contract** refers to a procurement contract under an award or sub award, and a procurement subcontract under a recipient's or subrecipient's contract. A contract is generally an agreement between the Subgrantee and a vendor.

15) **Continuing resolution** is an agreement by both houses of Congress to allow the federal government to continue operating at current funding levels, generally through a fiscal year.

16) **DBA FACSPro™** is the proprietary non-profit audit software developed by DBA Technologies, LLC used by OEO for Subgrantee reporting.

17) **Depreciation** is a cost allocation that represents the physical deterioration of property due to age, wear or market conditions.

18) **Direct costs** are those costs that can be specifically traced to a final cost objective, i.e., a particular award, project, service, or other direct activity of a Subgrantee. Some examples include:

    a) Maintenance of membership rolls, subscriptions, publications, and related functions.

    b) Providing services and information to members, legislative or administrative bodies, or the public.

    c) Promotion, lobbying, and other forms of public relations.

    d) Meetings and conferences except those held to conduct the general administration of the Subgrantee.

    e) Maintenance, protection, and investment of special funds not used in operation of the Subgrantee.

    f) Administration of group benefits on behalf of members or clients, including life and hospital insurance, annuity or retirement plans, financial aid, etc.

19) **Disallowed costs** are charges to an award that the federal awarding agency or pass-through entity determines to be unallowable, in accordance with the applicable state and federal cost principles or other terms and conditions contained in the award or grant agreement.

20) **Equipment** means tangible, nonexpendable personal property, including exempt property charged directly to the award having a useful life of more than one year and an acquisition

cost of $2,500 or more per unit. However, consistent with the Subgrantee's policy, lower limits may be established.

21) **Excess property** means property under the control of any federal awarding agency that, as determined by the head thereof, is no longer required for its needs or the discharge of its responsibilities.

22) **Federal Award Identification Number (FAIN)** is the unique number assigned to a federal award.

23) **Financial Status Report (FSR)** is the monthly revenue and expenditure report documenting the Subgrantee's use of grant funds.

24) **Fixed asset** may be a tangible or intangible nonexpendable property having a useful life of more than one year such as equipment, machinery, vehicles, furniture, and real property. (2 CFR § 200.12, 45 CFR § 75.2) For OEO purposes, a fixed asset has an acquisition cost equal to or greater than the lesser of $2,500 or the Subgrantee's capitalization policy threshold.

25) **General purpose equipment** is equipment, which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles.

26) **High Risk status** refers to a Subgrantee experiencing financial instability, inadequate financial management systems, and/or is programmatically performing poorly.

27) **Indirect costs** are those costs that are incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Indirect costs shall be classified as "Facilities" or "Administration." Facilities is defined as depreciation and use allowances on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses. Administration is defined as general administration and general expenses such as the director's office, accounting, personnel, library expenses and all other types of expenditures not listed specifically under one of the subcategories of Facilities (including cross allocations from other pools, where applicable).

28) **Management decision** is the assessment of the audit findings and corrective action plan by the pass-through entity or federal awarding agency. The management decision must clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action.

29) **Merit/Cola/FB/IDC** refers to particular categories within a Subgrantee's budget (merit increase/adjustment, cost of living allowance, fringe benefits, and indirect costs).

30) **Modified Total Direct Costs (MTDC)** means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first $25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000. Other items may only be excluded when necessary

to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

31) **Non-federal entity** is a state, local government, Indian tribe, institution of higher education (IHE), or nonprofit Subgrantee that carries out a federal award as a recipient/grantee or Subrecipient/Subgrantee. The Department of Energy expanded the non-federal definition to include for-profit entities, unless otherwise noted at 2 CFR § 910.

32) **OMB** refers to the Office of Management and Budget, which has the authority to issue guidelines for federal awards.

33) **Obligations** means the amount of orders placed, contracts and grants awarded, services received and similar transactions during a given period that requires payment by the Subgrantee during the same or a future period.

34) **Prior approval** refers to the requirement of obtaining written permission before the Subgrantee may undertake certain activities (whether performance of a new or modification of a previously approved activity), expend funds for specific direct costs, or exceed a certain aggregate dollar level.

35) **Professional services** are infrequent, technical, or unique functions performed by independent contractors or by consultants whose occupation is the rendering of such services. Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the agency, are allowable when reasonable in relation to the services rendered.

36) **Program income** means gross income earned by the Subgrantee that is directly generated by a supported activity or earned as a result of the award. Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under federally-funded projects, the sale of commodities or items fabricated under an award, license fees and royalties on patents and copyrights, and interest on loans made with award funds.

37) **Project** is defined as the set of activities described in an application, state plan, or other document that is approved by DOE for financial assistance, whether such financial assistance represents all or only a portion of the support necessary to carry out those activities.

38) **Project costs** means all allowable costs, as set forth in the applicable federal cost principles, incurred by a Subgrantee and the value of the contributions made by third parties in accomplishing the objectives of the award during the project period.

39) **Project period** is the total period of time indicated in an award during which DOE expects to provide financial assistance. A project period may consist of one or more budget periods and may be extended by DOE. It is the total time for which federal support has been programmatically approved as shown in the Notice of Award; however, it does not constitute a commitment by the federal government to fund the entire period

40) **Project Share** is a program consisting of subscriber and corporate contributions from utility companies. These contributions provide funds to supplement the Low-Income Home Energy Assistance Program (LIHEAP).

41) **Protected personally identifiable information (Protected PII)** means an individual's first name or first initial and last name in combination with any one or more types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include personally identifiable information that is required to be disclosed by law.

42) **Reasonable costs** are costs, if in its nature or amount, do not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. The reasonableness of specific costs must be scrutinized with particular care in connection with the Subgrantee or separate divisions thereof which receive the preponderance of their support from awards made by federal agencies. See also Procurement, Policies and Procedures.

43) **Rental income** is income generated when equipment is rented out at the fair market rate. WAP is generally the main grant that produces rental income. Rental income should be recorded as program income (see program income).

44) **Severance Pay**, also commonly referred to as dismissal wages, is a payment in addition to regular salaries and wages, by Subgrantees to workers whose employment is being terminated.

45) **Single Audit** is the required audit of federal awards as described in 2 CFR § 200.514 and 45 CFR § 75.514, which includes the entity's financial statements and required schedules related to federal awards.

46) **Subgrantee** or **Subrecipient** means the legal entity, non-federal entity, or agency to which a subaward is made and which is accountable to the Subgrantee for the use of the funds provided. The term may include foreign or international Subgrantees (such as agencies of the United Nations) at the discretion of the federal awarding agency.

47) **Supplies** are all personal property, excluding equipment, intangible property, and debt instruments as defined in this section, and inventions of a contractor conceived or first actually reduced to practice in the performance of work under a funding agreement ("subject inventions"), as defined in 37 CFR part 401, "Rights to Inventions Made by Nonprofit Subgrantees and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements."

48) **Uniform Administrative Requirements, Cost Principles, and Audit Requirements** for federal awards codified at 2 CFR Part 200, which is OMB's guidance consolidating the A-21, A-87, A-89, A-102, A-110, A-122, A-133 and sections of A-50 Circulars. The U.S. Department of Health and Human Services and the U.S. Department of Energy codified this OMB guidance at 45 CFR § 75 et al and 2 CFR §900 et al, respectively. Unless there are significant differences between 45 CFR § 75, 2 CFR §900 and 2 CFR § 200, the citation in this manual will be directed to 2 CFR § 200.

II. Pre-Award

This section is intended to provide guidance on requirements that must be complied with prior to receiving any federal awards.

Budget Process

This section describes the grant budgeting process and OEO oversight of Subgrantee budgets for the CSBG, LIHEAP and WAP grants.

Application and Actual Budgets

Generally, in the fall, the OEO develops a projected award budget based on information, including but not limited to, previous federal awards and any unused funds at the end of each program year. The projected budget is used to determine initial Subgrantee allocations for the new program year. The OEO fiscal staff will notify each Subgrantee of their funding level for the new program year, load the allocation into the DBA system, and inform the Subgrantees of the deadline for application budget submissions. No spending shall take place until the OEO receives the actual federal award notification from the federal funding source.

The OEO's projected award budget and application budget of Subgrantees are utilized until such time that the OEO receives notification of actual federal awards. Upon notice of actual federal awards, the OEO will revise its award budget and any allocations to Subgrantees. The OEO fiscal staff will notify each Subgrantee of their revised funding level for the program year, load the updated allocations into the DBA system and inform the Subgrantees of the deadline for actual budget submissions.

Budget Approval

A Subgrantee's Board of Directors must review the grant application and actual budget for each program year. The actual budget will be based on the actual award from the funding source and may include prior program year unexpended funds. A completed Community Action Agency Budget Approval Form must be submitted to OEO for documentation of the budget review and approval. The acknowledgement of the budget review will represent the total allocation of all awards budgeted, note specific approval of salary/wage increases, new positions, as well as procurements that require approval. The budget package submitted to OEO for approval must include all documents to support compliance with procedural requirements. The budget package must be submitted through DBA. This online budget submission process requires an authorized user with signature authority.

Salaries

Each Subgrantee is responsible for establishing employee salaries and any salary increases. Salary increases are to be based on each Subgrantee's available funds, sustainability, reasonableness, and documented board approval. Salary increases must be compliant with federal and state regulations, and with the agency's policies and procedures. This documentation, as well as position descriptions, must be maintained in accordance with the Subgrantee's approved policies and procedures. OEO's Fiscal Monitoring staff will review the Subgrantee's

approved policies and procedures during monitoring visits and may request a copy of them as needed.

All salary increases planned or anticipated for the new program year should be included in the Subgrantee's grant application. A detailed explanation supporting the proposed increase must also be presented. All salary and wage adjustments must be administered within the timeframe reflected in the approved budget. When OEO receives the actual federal award and subsequently notifies the Subgrantee of their actual award, the appropriate adjustments to the Salary and/or Merit/Cola/FB/IDC line items must be made using the actual award amounts. The Subgrantee will be permitted to amend the originally established Salary and/or Merit/Cola/FB/IDC line items for salary increases based on the actual award. However, only salary increases included in the grant application and application budget may be made retroactive to the beginning of the grant period. Documentation of Board approval must accompany the revised budget. Once the actual award has been received, wage and salary increases may be revised within the Merit/Cola/FB/IDC line items without additional OEO approval.

Documentation standards for personnel expenses are explicitly provided for at 2 CFR § 200.430 (i) and 45 CFR § 75.430 (i).

Subgrantees must:

1) Have a system of internal controls able to provide reasonable assurance that the charges for personnel expenses are accurate, allowable and properly allocated. This system must also be able to properly track, support and document the distribution of employee's salary or wages among specific activities or cost objectives if the employee works on more than one federal award;

2) Incorporate personnel expense records into the Subgrantee's official records;

3) Maintain records that account for the total activity for which employees are compensated by the Subgrantee and that are required in fulfillment of their obligations to the Subgrantee;

4) Comply with its established accounting policies and procedures; and

5) Provide after-the-fact determination of the actual activity of each employee. Budget estimates (i.e., estimates determined before services are performed) do not alone qualify as support for charges to federal awards.

OEO also requires that all charges to grants for salaries and wages have documented approval by an authorized personnel of the Subgrantee, regardless whether the charges are direct or indirect costs. Records reflecting the distribution of activity of each employee must be maintained for all staff members (professionals and nonprofessionals) whose compensation is charged, in whole or in part, directly to awards. In addition, in order to support the allocation of indirect costs, such records must also be maintained for other employees whose work involves two or more functions or activities if a distribution of their compensation between such functions or activities is needed in the determination of the Subgrantee's indirect cost rate(s).

Cost of Severance

As provided for in 2 CFR § 200.431 (i) and 45 CFR § 75.431 (i), costs of severance pay are allowable only to the extent that in each case, it is required by:

1) Law;

2) Employer-employee agreements;

3) Established policy that constitutes, in effect, an implied agreement on the Subgrantee's part; or

4) Circumstances of the particular employment.

Severance payments are divided into two categories as follows:

1) Actual normal turnover severance payments shall be allocated to all activities; or, where the Subgrantee provides for a reserve for normal severances, such method will be acceptable if the charge to current operations is reasonable in light of payments actually made for normal severances over a representative past period, and if amounts charged are allocated to all activities of the Subgrantee.

2) Measurement of costs of abnormal or mass severance pay by means of an accrual will not achieve equity to both parties, which is why accruals for this purpose are not allowable. However, the federal government recognizes its obligation to participate, to the extent of its fair share, in any specific payment. Prior approval by the federal awarding agency or cognizant agency for indirect cost, as appropriate, is required.

Costs incurred in certain severance pay packages (commonly known as "a golden parachute" payment) which are in excess of the normal severance pay paid by the Subgrantee to an employee upon termination of employment and are paid to the employee contingent upon a change in management control over, or ownership of, the Subgrantee's assets are unallowable.

Fringe Benefits (2 CFR § 200.431, 45 CFR § 75.431)

Fringe benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as vacation leave, sick leave, military leave, and the like, are allowable only when all of the following criteria are met:

1) They are provided under established written leave policies;

2) The costs are equitably allocated to all related activities, including federal awards; and

3) The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by the Subgrantee or specified grouping of employees.

    a. Under the cash basis of accounting, the cost of leave is recognized in the period that the leave is taken and paid for. Payment for unused leave when an employee retires or terminates employment is allowable in the year of payment.

    b. Under the accrual basis of accounting, the allowable leave costs are the lesser of the amount accrued or the amount funded. The accrual basis may only be used for those types of leave for which a liability as defined by GAAP exists when the leave is earned.

Fringe benefits in the form of employer contributions or expenses for social security, employee insurance, workmen's compensation insurance, pension plan costs (see 2 CFR § 200.431 (g), 45 CFR § 75.431 (g)), and the like, are allowable, provided such benefits are granted in accordance with established written Subgrantee policies. Such benefits whether treated as indirect costs or as direct costs, shall be distributed to particular awards and other activities in a manner consistent with the pattern of benefits accruing to the individuals or group of employees whose salaries and wages are chargeable to such awards and other activities.

Provisions for a reserve under a self-insurance program for unemployment compensation or workers' compensation are allowable to the extent that the provisions represent reasonable estimates of the liabilities for such compensation, and the types of coverage, extent of coverage, and rates and premiums would have been allowable if the insurance was purchased to cover the risks. However, provisions for self-insured liabilities which do not become payable for more than one year after the provision is made shall not exceed the present value of the liability.

Where a Subgrantee follows a consistent policy of expensing actual payments to, or on behalf of, employees or former employees for unemployment compensation or workers' compensation, such payments are allowable in the year of payment with the prior approval of the awarding agency, provided they are allocated to all activities of the Subgrantee.

Budget Items to Review

Listed below are items to consider regarding your agency's budget:

- Are documents properly signed?
- Did the board review and approve the budget? Board review is required when submitting the application budget, actual budget and when funding is increased during the program year or if otherwise required by OEO.
- Were new positions listed on the completed Community Action Agency Budget Approval Form?
- Does the budget salary detail or Merit/Cola budget line items list all current salaries and planned/anticipated increases?
- Has all procurement requiring approval by the Board and/or Executive Director been properly documented for review and approval? (Also, refer to Procurement, page 24)
- Was the agency's allocation accurately budgeted and reflected on the completed Community Action Agency Budget Approval Form and/or Board minutes?
- Have all budgets, supporting documentation, and purchases requiring OEO approval been sent to the OEO Fiscal Services Department?
- Are the position titles and employee IDs and county of work of all employees charged to the grant listed on the Salary Detail Form, which must be included in the final approved budget?
- Are the non-personnel expense categories (all budget line items except salary/wages, fringes, and indirect costs) reported on FSR's within the fifteen (15) percent variance

range? Variances of more than fifteen (15) percent may be permitted with OEO approval prior to the expenditure of funds.

NOTE: Any budget line item variance must be offset by another non-personnel expense category and cannot cause the total budget to exceed the Subgrantee's total allocation or grant award. Additionally, Admin., T&TA, and Health and Safety cannot exceed approved budget allocations for the DOE Weatherization and LWAP programs.

- Are periodic reviews of budget line item balances being conducted to ensure a budget revision is submitted when needed? See guidance on budget revisions on page 18.

- Have all the budget amendments been submitted to OEO prior to the last thirty (30) days of the program year?

- Have salary adjustments moving budget out of the Merit/Cola/FB/IDC line items and into the appropriate salary/wage detail been completed prior to the final budget submission for the program year?

Specific Conditions (2 CFR § 200.207, 45 CFR § 75.207)

OEO or the federal awarding agency may impose additional requirements on the Subgrantee as necessary. Such circumstances where additional requirements may be imposed include, but are not limited to, when the Subgrantee has a history of poor performance, is not financially stable, has a management system that does not meet the standards prescribed in 2 CFR § 200.205 and 45 CFR § 75.205, has not complied with the terms and conditions of a federal award, or is not otherwise responsible.

Special conditions that may be imposed include, but are not limited to the following:

1) Placing the Subgrantee under the cost reimbursement method of payment;

2) Requiring additional, more detailed financial reports;

3) Requiring additional project monitoring;

4) Requiring the Subgrantee to obtain technical or management assistance; or

5) Establishing additional prior approvals.

When special conditions are imposed, the Subgrantee will be informed of the following:

1) The nature of the additional requirements;

2) The reason why the additional requirements are being imposed;

3) The nature of the action needed to remove the additional requirements, if applicable;

4) The time allowed for completing the actions if applicable; and

5) The method for requesting reconsideration of the additional requirements imposed.

Conflict of Interest

Personnel and other officials connected with this Grant shall adhere to the requirements given below. Furthermore, Subgrantees are required to establish its own conflict of interest policies for federal awards incorporating these requirements (2 CFR § 200.112 and 45 CFR § 75.112).

1) Advice: No employee, officer, board member or agent of the Subgrantee may participate in the selection, award, or administration of a contract supported by a federal award if he/she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, board member or agent, any member of his/her immediate family, his/her partner, or an Subgrantee which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, board members and agents of the Subgrantee may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, a Subgrantee may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, board members or agents of the Subgrantee.

   No official or employee of the state or a unit of local government or of non-government Grantees/Subgrantees shall participate personally through decision, approval, disapproval, recommendation, the rendering of advice, investigation, or otherwise in any proceeding, application, request for a ruling or other determination, contract, grant, cooperative grant, claim controversy, or other particular matter in which these funds are used, where to his knowledge their immediate family, partners, Subgrantee other than a public agency in which he is servicing as officer, director, trustee, board member, partner, or employee or any person or Subgrantee with whom he is negotiating or has any arrangement concerning prospective employment, has a financial interest.

2) Appearance: In the use of these grant funds, officials or employees of the state or a local unit of government and non-governmental Subgrantees shall avoid any action which might result in, or create the appearance of:

   a. Using an official position for private gain;

   b. Giving preferential treatment to any person;

   c. Losing complete independence or impartiality;

   d. Making an official decision outside official channels; or

   e. Affecting adversely the confidence of the public in the integrity of the government or the program.

3) Subgrantee conflict of interest: The Subgrantee shall avoid conflict of interest involving relationships with a parent company, affiliate, or subsidiary Subgrantee that could cause the Subgrantee to appear or act impartially.

Mandatory Disclosure (2 CFR § 200.113, 45 CFR § 75.113)

The Subgrantee **must disclose**, in a timely manner, in writing, to the federal awarding agency or pass-through entity all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award. Failure to make required disclosures can result in any of the remedies described at 2 CFR § 200.338 or 45 CFR § 75.371.

The Subgrantee must also disclose, in a timely manner, in writing to OEO all potential or pending litigation involving the Subgrantee, which could potentially affect the award.

Nepotism

Subgrantees must comply with the South Carolina Ethics, Governmental Accountability and Campaign Reform Act of 1991 and are restricted from the hiring of relatives within the same office, program area, or the equivalent work unit.

1) No supervisory employee of the Subgrantee may cause the employment, appointment, promotion, transfer or advancement of a family member to a position in which the employee supervises or manages. Employees may also not participate in an action relating to discipline of their family members.

2) Definitions: The Ethics Act defines family member as an individual who is (a) the spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, grandparent, or grandchild; or (b) a member of the individual's immediate family.

   Immediate family is further defined as:
   - A child residing in an employee's household;
   - The spouse of an employee;
   - An individual claimed by the employee or employee's spouse as a dependent for income tax purposes.

   Furthermore, for the purposes of this policy, OEO has defined a relative to be a spouse, parent, sibling, child, parent in-law, grandparent, grandchild, sibling in-law, grandparent in-law, step-grandchild, step-child, child in-law, aunt, uncle, niece, or nephew of the employee or a member of the employee's household. OEO and state recognizes common-law marriages and the relationships that are created as a result.

Employees are expected to disclose relationships covered by this policy to the agency Executive Director and supervisor whenever the relationships come into existence. Employees have up to ninety (90) days after marriage to find employment in either a suitable unit within the agency or outside the agency. An employee's failure to disclose such information will lead to discipline up to and including termination. Supervisors shall not recommend the hiring of an individual if it results in violation of this requirement.

III. Post Award Requirements

This section addresses the standards and requirements of a financial management system, payments, program income, budget revisions, and property and procurement.

Financial Management System

Per 2 CFR § 200.302 (b) and 45 CFR § 75.302 (b), a Subgrantee's financial management system is required to provide the following:

1) Identification, in its accounts, of all federal awards received and expended and the federal programs under which they were received. Federal program and federal award identification must include, as applicable, the CFDA title and number, federal award identification number and year, name of the federal agency, and name of the pass-through entity, if any.

2) Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements set forth in 2 CFR §§ 200.327 - 200.328 and 45 CFR §§ 75.341 - 75.342.

3) Records that must adequately identify the source and application of funds for federally funded activities. These records must contain information pertaining to federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

4) Effective control over, and accountability for, all funds, property, and other assets. The non-federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes. See 2 CFR § 200.303 and 45 CFR § 75.303.

5) Comparison of expenditures with budget amounts for each federal award.

6) Written procedures to implement the requirements of 2 CFR § 200.305 and 45 CFR § 75.305.

7) Written procedures for determining the allowability of costs in accordance with 2 CFR and 45 CFR Subpart E – Cost Principles.

Payments

OEO is required to comply with 2 CFR § 200.305 (a) and 45 CFR § 75.305 (a), which includes the Cash Management Improvement Act (CMIA). Payment guidelines are set forth in § 200.305 (b) and 45 CFR § 75.305 (b), for all Subgrantees. More specifically, payment methods must minimize the time elapsing between the transfer of funds from the OEO and the disbursement of funds by the Subgrantee.

During the program year, it is the Subgrantee's responsibility to track its expenditures and submit a Certification of Advancement of Funds requesting funds needed and the reason for the request through DBA. The Certification of Advancement of Funds must be signed and dated by the Subgrantee's Executive Director, Finance Officer, and Program Officer. A separate form is required for each grant. The OEO Senior Fiscal Manager must review the request, and if

approved, a disbursement request will be submitted to Accounts Payable within the Department of Administration's Finance Office for processing. OEO maintains the right to request additional information from the Subgrantee prior to disbursing advance payments.

Payment requests may be submitted as frequently as biweekly but should be made at least monthly. In determining the payment request, Subgrantees should take into consideration:

- The amount of funds that have been obligated;
- Commitments and other funds needed to continue daily operations; and
- Time for the OEO to process and release funds requested. It ***may take up to thirty (30) days*** for OEO to process and release the requested disbursement.

Initial Disbursements

At the beginning of each program year, OEO will disburse payments as follows:

- For CSBG and LIHEAP, OEO will release a one-time advancement of funds as the initial disbursement for each grant. This advancement of funds is to cover the first two to four months of expenses of the grant, which will be calculated based on each Subgrantee's allocation and grant award for the respective program year.

- For WAP and LWAP, the amount of funds disbursed will be based on the request submitted by the Subgrantee, which must be in accordance with the actual, immediate cash requirements of the Subgrantee in carrying out the purpose of the weatherization program.

Initial disbursements are subject to change at the discretion of OEO, due to but not limited to, on-going federal funding concerns. A Subgrantee should request additional cash payments throughout the program year using the Certification of Advancement of Funds form.

Conditions of Payment

OEO will observe the following payment conditions in addition to other requirements set forth:

- If federal funding is awarded to the states based on a Continuing Resolution and/or federal authority is withheld, OEO will calculate advance payments to Subgrantees based on the amount of the federal authority received.

- Prior to the disbursement of any funds, Subgrantees must have an executed grant agreement, approved work plan and an approved current budget.

- Disbursements may be delayed until OEO has received a Subgrantee's approved budget revision based on the current program allocation.

- Payments will be made in compliance with all conditions of each grant and in compliance with all applicable state and federal statutes and regulations.

- Subgrantees placed on "High-Risk" status may be subject to additional payment conditions.

- The state's fiscal year ends on June 30, which may cause delays in processing June and/or July disbursements.

Emergency Solutions Grant (ESG) Program Disbursements

The ESG Program is a cost-reimbursement grant. As such, Subgrantees must submit a Request for Reimbursement (RFR) to the OEO ESG Program Coordinator along with all supporting documentation. The Program Coordinator will review the RFR and request additional supporting documentation, information, and adjustments if necessary. The RFR must be signed and dated by the Subgrantee's Executive Director or authorized staff.

ESG Program (HUD) Matching Requirement

a) **Required amount of matching contributions.**
The applicant must make dollar for dollar matching contributions to supplement its ESG Program. Matching contributions must equal the total ESG funds awarded by OEO.

b) **Eligible sources of matching contributions**.
Matching contributions may be obtained from any source, including any federal source other than the ESG program, as well as state, local, and private sources. However, the following requirements apply to matching contributions from a federal source of funds:

1) The Subgrantee must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.

2) If ESG funds are used to satisfy the matching requirements of another federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

3) Cash contributions. Cash deposits received and subsequently expended on allowable costs per 2 CFR Part 200 Subpart E: Cost Principles and that are also ESG eligible expenditures.

4) Noncash contributions. The value of any donated property, equipment, goods, or services contributed to the Subgrantee's ESG program, provided that if the Subgrantee had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

c) **Recognition of matching contributions**.

1) To meet the matching requirement, matching contributions must be compliant with all requirements applicable to the ESG funds provided by HUD, except for the expenditure limits in 24 CFR § 576.100.

2) Matching contributions must be provided during the program year for which they apply. Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.

3) To count toward the required match for the Subgrantee's fiscal year grant, cash contributions must be expended within the grant period, and noncash contributions must be made within the grant period.

4) Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award may not count as satisfying the matching requirement of this section.

Note: The Subgrantee must maintain records and supporting documentation for such contributions e.g. logs, volunteer reports, letters, appraisals, etc. OEO will require support documentation to determine whether such match contributions and expenditures are eligible and compliant with all applicable requirements.

d) **Calculating the amount of non-cash contributions**.

1) To determine the value of any donated material or building, or of any lease, the Subgrantee must use a method reasonably calculated to establish the fair market value. Fair market value is allowed; however, equity cannot be used as match.

2) Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work employed by the Subgrantee. If the Subgrantee does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

3) Some noncash contributions are real property, equipment, goods, or services that, if the Subgrantee had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the Subgrantee has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

The above referenced payment procedures may require modification and payments may vary when extenuating circumstances occur.

Re-Allocation of Undisbursed Program Funds

1) **CSBG – US HHS**

RECAPTURE PROVISION - P.L. 108-447 mandates, that to the extent Community Services Block grant funds are distributed as grant funds by a state to an eligible entity, that is provided under the (CSBG) Act, and have not been expended by such entity, they shall remain with such entity for carryover into the next fiscal year for expenditure by such entity consistent with program purposes. However, unspent funds awarded as discretionary funds shall not be carried over and must be returned to OEO.

Thus, Subgrantees are allowed at the beginning of the grant period to retain funds from the close of the previous grant period (unless instructed otherwise). Agencies are allowed to expend against prior year unexpended funds (cash on hand). Expenditures must comply with the agency's most current program year's approved work plan, budget, and signed grant agreement. This should ease the burden on agencies to sustain programs during periods of delayed federal awards and allow the immediate expending against prior year funds (cash on hand.) Prior year unexpended funds will be incorporated into the current program year in the Actual Allocation and will be based on the fund balance represented on the final FSR.

2) **ESG – US HUD**
All ESG funds are distributed using the cost reimbursement payment method. All ESG funds must be obligated and expended in the program year they were intended to qualify for reimbursement. All unallowable reimbursed funds must be returned to OEO to be refunded to HUD. All unexpended and unobligated ESG funds must be refunded to HUD and/or retained by HUD. Subgrantees are required to submit their final request for reimbursement and matching support documentation by close of business on August 15.

Interest Income (2 CFR §200.305(b)(8) and (9) and 45 CFR §75.305(b)(8) and (9))

Funds **advanced from OEO to Subgrantees must be placed in an interest bearing account**. The procedures regarding the monitoring, reporting and use of interest are as follows:

1) Confirm that all federal funds are placed in an interest bearing account.

2) The first $500 of interest earned on federal funds per Subgrantee per year (**not per grant**) may be retained to offset administrative costs in the program year the interest was earned. Per 2 CFR § 200.305 (b)(5) and 45 CFR § 75.305 (b)(5), Subgrantees must utilize interest earned before requesting additional cash payments. See also item number 5 below.

3) All interest earned over $500 is required to be tracked on financial documents in an account separate from OEO grant revenue and other program income.

4) Interest earned over the allowable $500 to be retained by the Subgrantee must be remitted to the U.S. Department of Health and Human Services Payment Management System using either the Automated Clearing House network or a Fedwire Funds Service payment. Refer to 2 CFR §200.305 (b)(9) and 45 CFR §75.305(b)(9) for more detailed instructions. Proof of administrative cost offset may be requested by OEO and reviewed as part of OEO's monitoring activities.

5) Some bank charges are an allowable cost, but they must be cost shared, reasonable, and not related to investments. Refer to 2 CFR § 200.305 and 45 CFR § 75.305.

Program Income

Costs attributed to the generation of program income may be deducted from gross income if allowed by the federal award or federal regulations. This is generally performed when calculating program income, on the condition that such costs were not already charged to the federal award.

If the use of program income is not addressed in the federal awarding agency's regulations, terms and conditions of the federal award, or the federal awarding agency does not give prior approval, program income must be deducted from current costs. Program income not anticipated at the time of the federal award must be used to reduce the federal award and the Subgrantee's contributions rather than increase the funds committed to the project or program objectives. Program income must be accounted for separately in the Subgrantee's financial records.

Moreover, per the Department of Energy (DOE) Weatherization Program Notice 07-1, section 1.6 – Program Income, income generated must be used to complete dwelling units in accordance with DOE Rules. This should be incorporated in the appropriate section of the updated WAP budget (budget narrative only).

OEO may sample program income to ensure revenue is properly recorded, supported with adequate documentation and is compliant with OEO procedures, grant agreement, budget and FSR requirements. While the Subgrantee is encouraged to earn program income to defray costs, the Subgrantee must retain separate records for program income generated and the costs that are offset. As such, program income is to be identified in the chart of accounts and financial documentation (trial balance).

Equipment purchased with program income and subsequently disposed of will be handled in accordance with current OEO disposal procedures.

Equipment purchased with federal funds may not be rented out at a rate less than what a private company would normally charge (rental income) for such equipment rental unless otherwise authorized by federal statute. (2 CFR § 200.313 (c)(3), 45 CFR § 75.320 (c)(3))

Refunds

When a Subgrantee receives a refund from a vendor for direct assistance and/or client services provided in a prior program year, the refund must be returned to OEO. See Appendix A for the Client Refund Form.

Program Changes

During the program year, the Subgrantee may need to make revisions affecting the initial work plan approved by OEO. In these instances, Subgrantees are required to submit a written request for a program change, in advance, to the appropriate OEO Senior Program Manager for review and written approval. As part of this review process, OEO may request additional information, supporting documents or justification associated with the requested program change(s). If approved, the OEO Senior Program Manager will then provide written notification of approval to OEO Fiscal Services to coordinate the program changes with the Subgrantee's budget revision. **If these procedures are not followed, the expenditures associated with the program change shall be disallowed**.

Budget Revisions

A Subgrantee is required to report deviations from budget and program plans and request prior approval for revisions to the Subgrantee's budget and program plan. A request for approval of changes must be submitted to OEO prior to any revisions being implemented. Examples of changes include, but are not limited to the following:

1) Changes in the scope or the objective of the grant's project or program, which also require prior written approval when revising the work plan and the budget;

2) Changes to comply with the fifteen (15) percent line item variance allowed on certain budget line items;

   NOTE: Any budget line item variance must be offset by another non-personnel expense category and cannot cause the total budget to exceed the Subgrantee's total allocation or grant award. Additionally, Admin., T&TA, and Health and Safety cannot exceed approved budget allocations for the DOE Weatherization and LWAP programs.

3) Changes due to funding level adjustments;

4) Change in key personnel specified in the application or the federal award;

5) Disengagement from the project for more than three (3) months, or a twenty-five (25) percent reduction in time devoted to the project, by the approved project director or principal investigator;

6) The transfer of funds budgeted for participant support costs, as defined at 2 CFR § 200.75 and 45 CFR § 75.2, to other categories of expense; and

7) The inclusion of costs that require prior approval, as specified in 2 CFR Part 200 and 45 CFR Part 75, Subpart E: Cost Principles.

All changes to a Subgrantee's approved work plan for CSBG, LIHEAP and WAP requiring OEO approval must be submitted to the appropriate OEO Senior Program Manager. OEO Fiscal Services will coordinate the program changes with the Subgrantee's budget revision. Should a Subgrantee's revision request impact their allocation as it is presently loaded in the DBA system, the Subgrantee will be required to complete an Allocation Revision Form and return it to the OEO prior to completing any revisions. Subgrantees must contact OEO Fiscal Services to obtain an Allocation Revision Form as it will vary by grant.

Property Standards

The following policies are established to address the acquisition, identification, assignment, usage and maintenance of vehicles/property. Through these policies, OEO seeks to achieve maximum cost-effective management of property purchased in support of the Subgrantee's performance targets and objectives for OEO funded programs. OEO also seeks to eliminate unofficial and unauthorized use of grant vehicles/property.

a) **Acquisition**
   - **Approval**: Provide a copy of the signed Community Action Agency Budget Approval Form and/or board minutes listing the vehicles/property purchase information.

   - **Justification**: Provide criteria and cost analysis based on how the vehicles/property will be utilized for grant purposes and indicate the number of program operators. The justification will document how the vehicles/property will clearly benefit the grant's intent and will ensure compliance with all federal, state and local regulations.

   - **Purchase**: Agencies will follow all procurement procedures and maintain adequate insurance.

b) **Identification**
   The Subgrantee will maintain a current inventory of OEO funded property, which will indicate the make, model, acquisition date and cost, the manufacturer's identifying serial number, location, and estimated disposal date. The Subgrantee will ensure that all OEO funded vehicles are clearly identified by the use of affixed license plates and seal decals. Vehicle identification will not be removed until the vehicle is processed for disposal. Decals must be replaced if they become unrecognizable. No OEO funded vehicle shall be exempt from this identification requirement.

c) **Assignment**
The Subgrantee will develop policies and procedures that ensure vehicle/property are used in the most cost-effective manner. Vehicles/properties purchased with OEO funds are not for personal use and assigned based on the following criteria:

1) Vehicles/properties are only authorized for use in the performance of program related tasks necessary to accomplish program objectives.

2) Subgrantee employee has received document approval for the use of the vehicle/property.

Assignment of a Subgrantee vehicle/property purchased with OEO funds is prohibited as a prerequisite of employment.

d) **Usage**
Vehicles are intended for Subgrantee employees required to travel in the performance of official program related business. All Subgrantee employees utilizing vehicles will log each trip on a form providing the following information: date of travel, staff traveling in vehicle, beginning and ending odometer reading, purpose of trip, and specific program related function performed. Refer to the Record Retention section of this manual for a more detailed discussion on the required retention period of vehicle logs. Current program year logs are to include the beginning and ending odometer reading for the program year and are to be maintained in an active file and readily available upon request during OEO Fiscal and Program Monitoring visits.

- Any mileage incurred for personal use is prohibited. An employee “on-call” does not justify personal use or sole use of an OEO funded vehicle.

- Official miles must be appropriate for the program related travel.

- The recipient of federal funds will not use equipment, vehicles, and property acquired with federal funds to provide services or use by non-federal outside Subgrantees. If federally acquired equipment/vehicles/property are allowed to be utilized by outside Subgrantees, a fee, that is not less than the fee a private company would charge (market rate) for the equal service, must be collected. The fees earned for the use of equipment/vehicles/property acquired with federal funds must be classified as Program Income in the grant of the original acquisition.

e) **Maintenance**
OEO will monitor the cost-effectiveness of OEO funded vehicles/property. The Subgrantee will provide records, which supply sufficient and accurate maintenance information to evaluate compliance when and if requested by OEO.

Equipment/Asset Disposal (Surplus Property)

Subgrantees must obtain OEO’s approval prior to disposing any equipment or asset purchased with OEO funds. Subgrantees may use the old equipment as trade-in or dispose of it through the state’s Surplus Property Office. A written request must be submitted to the OEO Senior Manager for Fiscal Monitoring explaining the reason for requesting the disposal of the equipment and the means by which the Subgrantee wishes to dispose of the equipment (trade-in or Surplus Property Office).

When disposing of computing devices, the Subgrantee is required to sanitize or destroy the hard drive to ensure that all protected PII are properly erased. This includes all copiers that have a hard drive. The Subgrantee must maintain sanitization records for a minimum of three (3) years.

As the administering agent, OEO is authorized to utilize the State of South Carolina's Office of General Services for disposal of surplus property. The following are procedures for disposing of property:

1) The Subgrantee will submit a written request to dispose of property, including supplies such as insulation, to the OEO Senior Manager for Fiscal Monitoring. The written request must include the condition of the asset, reason for disposal, location of the property, description of property with serial number, year purchased, quantity, and acquisition cost per unit. In addition to the preceding list, the written request must include the date and method of sanitization, and who performed the sanitization for all computing devices. For vehicles, the written request must include the condition of the asset, photos of the asset, acquisition cost, reason for disposal, year purchased, VIN number, mileage, book value and market value when desiring to transfer property.

2) The Subgrantee must complete a Turn-In Document (TID) and submit the completed form to OEO. The form will then be forwarded to the Office of General Services, Surplus Property Office. OEO will retain a copy of this document for tracking purposes. Questions regarding a request to surplus property should be directed to OEO Senior Manager for Fiscal Monitoring.

3) The Surplus Property Office will review the TID and send a screener out to determine if the property is of any value. They will arrange for pick-up of the property and determine if the property will be sold at public auction or by competitive sealed bid. Please note, agencies are allowed to stipulate a minimum amount required before a bid will be accepted.

4) The Office of General Services will deposit the proceeds from the sale less the expense of the sale in the fund designated on the TID.

When liquidation occurs for any property purchased with federal funds, (for example, an insurance check for a totaled vehicle) proceeds must be returned to the source of funds from which the property was originally purchased to offset the purchase of replacement property. If the Surplus Property Office determines that OEO program inventory is of no resale value, the Subgrantee must then assume responsibility for timely and proper disposal.

Once a final determination is reached and the Subgrantee is notified by the Surplus Property Office, within ten (10) working days, the Subgrantee's Executive Director must inform OEO Senior Manager for Fiscal Monitoring in writing of the final disposal.

Asset Rules and Regulations

These procedures were developed to assist the Subgrantees in establishing proper procedures for obtaining effective internal control and record maintenance for assets (capitalized-fixed and non-capitalized assets) purchased with OEO funds. The Subgrantee must be able to account for all property whether sold or traded.

1) **Assets Management Standards**
Titles shall vest with the Subgrantee on the condition the Subgrantee uses the assets for the authorized purpose of the project as long as is needed. In compliance with OEO grant agreement, Subgrantee's management systems shall provide for effective control over and accountability for all funds, property and other assets. The Subgrantee shall adequately safeguard all such assets and assure they are used solely for authorized purposes. Adequate written procedures must be in place to determine the reasonableness and allowability of costs and to guard against loss, damage and theft. Loss, damage and/or theft are to be reported immediately to OEO (OEO notification applies to fixed assets and computing devices).

2) **Insurance Coverage**
The Subgrantee shall provide adequate insurance coverage for all assets/property acquired with federal funds in compliance with 2 CFR § 200.310 and 45 CFR § 75.317 and as outlined in OEO procurement procedures, see page 32. The Subgrantee shall terminate insurance coverage once the Subgrantee has properly disposed of the insured assets in accordance with OEO surplus property and equipment disposal procedures.

3) **Other Use**
A Subgrantee may make all assets available for use to other projects that have purposes consistent with those authorized by the Subgrantee (see 2 CFR § 200.313 (c)(1) - (4) and 45 CFR § 75.320 (c)(1) - (4)). Preference shall be given first to other OEO-sponsored projects and programs, then to other federally funded programs and lastly to non-federal programs/Subgrantees whose purpose is consistent with those authorized by the Subgrantee. A Subgrantee must obtain OEO's written approval prior to using an asset for trade-in purposes, disposing of the asset and prior to transferring asset(s) to other federally sponsored programs (approval applies to fixed assets and computing devices).

Other CAA's and non-federal programs and Subgrantees shall be charged a fee equal to that charged by private companies for similar services. These fees are to be charged as "Program Income" and accounted for separately from OEO disbursed "grant revenue" on financial records. This revenue is to be returned and/or used solely for OEO program for which the equipment/property was initially purchased.

4) **Asset/Inventory Records**
The Subgrantee must maintain records to verify the existence and current utilization of all OEO-funded assets for all periods in which the asset is in use and to account for all assets sold or traded-in in compliance with OEO grant agreement and 2 CFR § 200.313 (d)(1) - (5) and 45 CFR § 75.320 (d)(1) - (5). Records shall be retained in compliance with 2 CFR §§ 200.333, 200.335, and 200.336 and 45 CFR §§ 75.361, 75.363 and 75.364.

The Subgrantee must ensure that asset records contain the following information: asset description, serial and model number, FAIN, acquisition date and cost, depreciation method and useful life (for fixed assets), asset location, condition, disposal date and revenue generated from said disposal, in compliance with 2 CFR § 200.313 (d)(1) - (4) and 45 CFR § 75.320 (d)(1) - (4). Assets are to be capitalized according to 2 CFR § 200.439, 45 CFR § 75.439 and the Subgrantee's capitalization policy.

In accordance with OEO procedures, based in part on 2 CFR §§ 200.313 - 200.314 and 45 CFR §§ 75.320 - 75.321, the Subgrantee must conduct an annual physical inventory of computing devices and capitalized (fixed) assets, document the asset's location and condition, and reconcile the results as of the end of the Subgrantee's fiscal year.

Subgrantees must submit the final inventory list to OEO no later than April 30. Subgrantees must also track and monitor non-capitalized assets that are purchased in the current period (i.e. printers, office furniture, and tools). OEO requires that all assets with an acquisition value of $2,500 or greater be included on the inventory listing unless the Subgrantee's policies and procedures require a lower limit. **OEO also requires that all computing devices be recorded and tracked, regardless of the amount of acquisition.** The final inventory list will be compared to the depreciation schedule prepared as part of the Subgrantee's external audit (at Subgrantee's fiscal year end, for fixed assets only). Any differences shall be documented and explained in the Subgrantee's fixed asset reconciliation. OEO reserves the right to inspect non-capitalized assets on this listing to ensure the listing's accuracy.

All computing devices, regardless of the amount of acquisition, must be recorded and tracked.

OEO requires the Subgrantee to maintain the following supporting documents, including but not limited to:

- Copy of depreciation schedule;
- Copy of documented asset locations and conditions;
- Asset reconciliation sheet;
- Documents to support asset purchases; and
- Documents to support asset disposals.

Capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the federal awarding agency or pass-through entity.

5) **Depreciation**
Depreciation computation shall be based on the asset's acquisition cost (invoice price) and directly attributable costs necessary to bring the asset into working condition. Adequate depreciation records must be maintained indicating the amount of depreciation taken each period and the total amount of accumulated depreciation (2 CFR § 200.436 (e), 45 CFR § 75.436 (e)). OEO requests that a copy of the depreciation schedule be attached to the Subgrantee's single audit report upon submission to OEO.

6) **Intangible Property**
The federal awarding agency reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the patent or copyright for federal purposes, and to authorize others to do so when such property was developed or ownership was acquired under a federal award.

Procurement

Policies and Procedures

It is the intent of OEO to maximize program efficiency, ensure the application of appropriate procedures, and maintain the integrity of grant funds. These guidelines will assist Executive Directors, Board of Directors and Subgrantee personnel in conducting procurement transactions in a timely manner and in maximizing each Subgrantee's purchasing effectiveness. Subgrantees must comply with all applicable federal and state statutes and regulations.

Prices must be considered reasonable and in determining the reasonableness of a given cost, consideration shall be given to:

1) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the Subgrantee or the performance of the award;

2) The restraints or requirements imposed by such factors as generally accepted sound business practices, arms-length bargaining, federal and state laws and regulations, and terms and conditions of the award;

3) Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the Subgrantee, its members, employees, clients, the public at large, and the federal government;

4) Significant deviations from the established practices of the Subgrantee, which may unjustifiably increase the award costs; and

5) Market prices for comparable goods or services for the geographical area.

Below are procurement policies and procedural guidelines for Subgrantees:

1) Additional fees charged to items or services purchased for administrative operations due to late payments are unallowable costs to OEO federal grant awards.

2) Procurement documentation of equipment, furniture and fixtures, supplies and services will be based upon clear and accurate written descriptions, including any applicable technical specifications.

3) All professional/consultant services in excess of $600 must receive prior OEO approval.

4) Where possible, priority should be given to services from vendors who are selected from the current State Procurement Contract database, which can be found at http://procurement.sc.gov/PS/PS-index.phtm.

5) All procurement expenditures must be adequately documented with a voucher/check, invoice, endorsed delivery receipt, requisition/purchase order for each transaction and applicable approval as may be required within the Subgrantee's procedures.

6) The Subgrantee must incorporate these guidelines into its respective procurement procedures.

7) OEO Fiscal Monitoring Department will review the Subgrantee's procurement procedures and purchases during the fiscal monitoring. Inconsistencies and non-compliance issues will be noted for corrective action.

8) OEO may request, at any time, justification and documentation supporting any purchase as a direct cost of OEO funded programs.

9) Agencies must ensure that all transactions associated with OEO grant funds are in compliance with conflict of interest requirements, including but not limited to: using an official position for private gain, giving preferential treatment to any person or vendor, losing complete independence or impartiality, making official decisions outside official channels, or adversely affecting the confidence of the public in the integrity of the government or the program.

10) Agencies must ensure that all officers, employees and agents neither solicit nor accept gratuities, favor, or anything of monetary value from contractors, or parties to the Subgrantee.

11) All property and equipment acquired with OEO award funds must have adequate insurance coverage that safeguards against loss and/or damage.

12) All items budgeted and processed as an obligation/encumbrance against program funds must be received, earned and/or completed by the end of the programs grant period.

13) Sound accounting principles will be practiced when establishing accruals at the end of each program. Expenditures being accrued such as salaries, utilities, and travel must be transactions within the program year, based on clear and justifiable documentation, and paid to the vendor when “normally due” or within 30 days from the close of the grant.

WAP subcontractor agreements and contracts are required to follow the above referenced procurement guidelines. (Also, refer to Weatherization Contractor Procurement on page 27 and Contractor/Subcontractor Payments (WAP Only) on page 34 for requirements specific to the weatherization program.)

Factors Affecting Allowability of Costs

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under OEO administered grant awards:

- Be necessary and reasonable for the performance of the federal award and be allocable thereto under these principles.

- Conform to any limitations or exclusions set forth in these principles or in the federal award as to types or amount of cost items.

- Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the non-federal entity.

- Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to a federal award as an indirect cost.

- Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.

- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.

- Be adequately documented.

- DOE and HHS have established additional guidelines regarding weatherization measures that may be paid for, and the types and composition of materials that are allowable within the weatherization program. Information on these items is available in the SC Weatherization Assistance Program State Plan, LIHEAP State Plan, South Carolina Weatherization Assistance Program Policies and Procedures Manual, and the DOE Weatherization web site (https://energy.gov/eere/wipo/weatherization-assistance-program). In addition, the DOE portion of the weatherization grant agreement is governed by 10 CFR Part 440 – Weatherization Assistance for Low-Income Persons.

Purchases

Subgrantee shall establish written procurement procedures in accordance with federal and state procurement regulations, including written standards for conduct covering conflicts of interest and governing the actions of employees, officers and agents.

S.C. Code Ann. §11-35-1550 shall be utilized in conducting procurements up to $50,000 unless the proposed purchase is from a vendor who is selected from the current State Procurement Contract, which must be verified through the State's Materials Management Office (MMO). OEO reserves the right to question any procurement during fiscal and/or programmatic monitoring that it considers to be unreasonable. OEO staff may approve the purchase or may request additional information to assist with clarifying the justification of the purchase as it relates to program need. Larger purchases of like goods or services may not be subdivided in order to circumvent procurement requirements.

1) **Small Purchases less than $2,500**
   Small purchases not exceeding $2,500 may be made without securing competitive quotations if the prices are considered reasonable. The purchasing office must annotate the purchase requisition: "Price is fair and reasonable" and sign. The purchases must be distributed equitably among qualified suppliers. When practical, a quotation must be solicited from other than the previous supplier before placing a repeat order. The administrative cost of verifying the reasonableness of the price of purchase "not in excess of" may more than offset potential savings in detecting instances of overpricing. Action to verify the reasonableness of the price need be taken only when the procurement officer of the governmental body suspects that the price may not be reasonable, comparison to previous price paid, or personal knowledge of the item involved.

2) **Purchases over $2,500 up to $10,000**
   Solicitation of written quotes from a minimum of three (3) qualified sources of supply must be obtained and documentation of the quotes attached to the purchase requisition for purchases over $2,500, but not exceeding $10,000. The award must be made to the lowest responsive and responsible sources.

3) **Purchases over $10,000 up to $50,000**
Written solicitation of written quotes, bids, or proposals must be made for purchases over $10,000 but not in excess of $50,000. The procurement must be advertised at least once in the South Carolina Business Opportunities publication (scbo@mmo.sc.gov). A copy of the written solicitation and written quotes must be attached to the purchase requisition. The award must be made to the lowest responsive and responsible source or, when a request for proposal process is used, the highest ranking source.

4) **Contracts greater than $50,000**
Such contracts must be awarded by competitive sealed bidding as described in S.C. Code Ann. § 11-35-1520. In addition, prior OEO approval and a cost or price analysis are required for purchases of over $150,000 (2 CFR § 200.323, 45 CFR § 75.332). The Subgrantee must also make an independent estimate before receiving bids or proposals, and make available upon request, pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates for procurements over $150,000 (2 CFR § 200.324, 45 CFR § 75.333).

5) **Sole Source**
Sole source contracts are highly discouraged. However, when there is only one source for a supply, service, information technology, or construction item without competition, a sole source procurement may be transacted. In cases of reasonable doubt, competition must be solicited to support the sole source decision. A written explanation as to why no other vendor will be suitable or acceptable to meet the need, in addition to supporting documents, must be forwarded to OEO for review and approval prior to entering into a sole source contract.

6) **Purchases Using Gift Cards**
Gift cards are a financing tool. Money loaded on the card cannot be recognized as expenditure in an OEO administered grant until the money is actually exchanged for goods or services. Receipts from purchases with a gift card must be retained as documentation of expenditures. Purchases using a gift card are required to comply with allowable cost and procurement policies. Records must be maintained to document the employee issued the card, when the card was issued and transaction/balance detail.

7) **Emergency Procurements**
Procurement may be made when there is an immediate threat to public health, welfare, critical economy or efficiency, or safety, and provided that such an emergency procurement is made with as much competition as is practical under the circumstances, with a follow-up written report from the Executive Director on the basis of the emergency and the selection of the vendor.

8) **Weatherization Contractor Procurement**
When procuring contractors to provide weatherization services, Subgrantees will follow S.C. Code Ann. §11-35-1525 competitive fixed price bidding. Public notice shall be given through the South Carolina Business Opportunities. This notice does not require a closing date to allow additional participants throughout the grant cycle. This contract is eligible for multiple renewal periods. Eligible contractors must provide appropriate license and insurance as required by the Department of Energy and OEO. In addition, prior to awarding a contract to the vendor, the Subgrantee is required to have the vendor complete the Certification Regarding Debarment, Suspension and Other Responsibility Matters Primary Covered Transactions form (SBA Form 1623) found at Appendix B. The

Subgrantee is required to verify the subcontracts having any active exclusion through the federal government's System for Awards Management (SAM) at www.SAM.gov.

All procurement transactions must be conducted in a manner to provide, to the maximum extent practicable, open and free competition. The Subgrantee shall be alert to Subgrantee conflicts of interest and noncompetitive contract practices among contractors that may restrict or eliminate competition or otherwise restrain trade. Contractors that develop or draft specifications, requirements, statements of work, invitation for bids and/or requests for proposals shall be excluded from competing for such procurements. (2 CFR § 200.319, 45 CFR § 75.328) Solicitations shall clearly set forth all requirements that the bidder or offer shall fulfill. Any and all bids or offers may be rejected by the Subgrantee when it is in the Subgrantee's interest to do so. Also, refer to the Conflict of Interest section on page 11 of this manual.

Annual Equipment, Furniture & Fixtures Budget Requirements

Allowable "equipment" is tangible non-expendable personal property charged directly to the federal award. Equipment should be documented as either capitalized or non-capitalized, have a useful life of more than one (1) year and with a unit acquisition cost equal to or greater than two thousand five hundred dollars ($2,500). If the Subgrantee's policy requires a lower amount, the Subgrantee will adhere to the lower amount. Examples of equipment are vehicles, copiers, phone systems, etc. Furniture and fixtures are moveable items such as desks, chairs, storage cabinets, lighting, copiers, fax machines, computers, printers and telephones. In addition, the WAP grant may require additional items such as blower doors, generators, trailers, etc. For the purpose of OEO funded grants, all purchases of the items listed above are to be listed on the Annual Equipment, Furniture & Fixtures Budget form if the acquisition cost is equal to or greater than $2,500 per unit.

This form is a budgeting tool, which assists the OEO Fiscal Monitoring Department in monitoring assets purchased with OEO administered grant funds. The items listed on the Annual Equipment, Furniture and Fixtures Budget form may not be representative of your Subgrantee's capitalization policy for fixed assets. Proper inventory records of both non-capitalized and capitalized assets purchased with OEO grant funds will be reviewed during OEO Fiscal Monitoring field visits. During the site visit, OEO will also require an inventory of tangible property purchased with OEO grant funds that do not meet the $2,500 (classified as supplies) budget threshold.

When submitting a program budget, all anticipated purchases for the program year will be listed on the Annual Equipment, Furniture & Fixtures Budget form. Items listed will require procurement documentation, specifications, bid/quotes and justification upon the submission of the budget when procurement guidelines require or OEO requests supporting documentation. Subgrantees must obtain board approval when required. When OEO approves a Subgrantee's budget, the identified items will be reviewed and approved for procurement within the program year. Once this process is accomplished and all provisions are satisfied, the Subgrantee is ready to complete the procurement, which must be executed and items received prior to the close of the grant period.

Certification of Cost Allocation Plan or Indirect (F&A) Cost Rate Proposal

Each proposal to establish a cost allocation plan or an indirect (F&A) cost rate must be certified by the Subgrantee using the Certificate of Cost Allocation Plan or Certificate of Indirect Costs as set forth in Appendix IV of 2 CFR Part 200 and 45 CFR Part 75. The certificate must be signed by an individual at a level no lower than vice president or chief financial officer of the Subgrantee. Unless the Subgrantee has elected a de minimis rate of 10% of modified total direct costs (2 CFR

§ 200.414 (f), 45 CFR § 75.414 (f)) and has never had a federally negotiated indirect cost rate, the federal government may either disallow all indirect (F&A) costs or unilaterally establish such a plan or rate when the Subgrantee fails to submit a certified proposal for establishing such a plan or rate in accordance with the requirements.

Indirect Costs

A cost that benefits more than one cost objective, is incurred for a common or joint purpose, and is not readily assignable to a final cost objective that specifically benefited from it without undue effort is considered an indirect cost. Examples of indirect costs include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities, and general administration and general expenses, such as the salaries and expenses of executive officers, personnel administration, and accounting.

No revisions to the FINAL (Closeout) FSR will be allowed after the closeout period due to federal reporting requirements. Any changes to fund balance after the closeout period due to indirect cost over-recoveries and/or disallowed cost will be determined by OEO Fiscal Monitoring and collected from the Subgrantee during the Fiscal Monitoring process.

Negotiation and Approval of Indirect Cost Rates

The cognizant agency for indirect costs is the federal agency with the largest dollar value of awards with a Subgrantee, unless a different arrangement is made with the federal agencies concerned. The assigned cognizant agency for indirect costs to a Subgrantee will not change unless there is a change in the dollar volume of federal awards to the Subgrantee for at least three (3) years. When the Subgrantee receives an approved federally negotiated indirect cost rate from its cognizant agency, the Subgrantee must provide OEO Fiscal Services and OEO Fiscal Monitoring a copy of the negotiated rate document within thirty (30) days.

In certain situations, OEO may become the cognizant agency for indirect costs for the Subgrantee. As such, the Subgrantee must submit its indirect cost rate proposal to OEO for approval. The Subgrantee must also refer to Appendix IV of 2 CFR Part 200 and 45 CFR Part 75 for instructions on methods in calculating the indirect cost rate. Indirect costs must comply with 2 CFR §§ 200.403 - 200.405 and 45 CFR §§ 75.403 - 75.405 regarding reasonableness and allowability. The dollar amount of indirect costs allocable to a grant will be determined by multiplying the approved indirect cost rate by the applicable financial base of the grant period.

Indirect Cost Rate Adjustments

Adjustments to rates due to disallowed costs are adjusted as follows:

1) For rates covering a future fiscal year of the non-federal entity, the unallowable costs will be removed from the indirect (F&A) cost pools and the rates appropriately adjusted.

2) For rates covering past fiscal years, the federal share of the disallowed costs will be calculated and refund sent to OEO.

3) For rates covering the current fiscal period, the method of adjustment is decided by the cognizant agency.

Subgrantees are advised to review the Subgrantee's indirect costs on a quarterly basis. At the end of an OEO program year, indirect costs on the final FSR are to be adjusted to the most current indirect cost rate.

Direct Costs

When a cost benefits two or more projects or activities and can be allocated to the project or activity based on the proportional benefit without undue effort or cost, it is a direct cost and should be allocated to all programs benefitted. The direct cost must be allocated based on the proportional benefit to the project or activity. If the proportions of the direct cost cannot be determined because of the interrelationship of the work involved, the cost may be allocated or transferred to the projects that benefitted from the cost based on any reasonable documented basis. This should not be done, however, to overcome fund deficiencies, avoid restrictions imposed by federal statues, regulations, or terms and conditions of the federal award or grant agreement, or for other reasons. (2 CFR § 200.405 (c) - (d), 45 CFR § 75.405 (c) - (d)) Where the purchase of equipment or other capital asset is specifically authorized under a federal award, such costs must be charged direct to the federal award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required.

A cost may not be assigned to an award as a direct cost if similar cost in other programs incurred for the same purpose, in like circumstance, has been allocated to an award as an indirect cost. Costs identified specifically with other final cost objectives of the Subgrantee are direct costs of those cost objectives and are not to be assigned to other awards directly or indirectly.

The costs of certain activities are not allowable as charges to federal awards. However, all direct costs regardless of whether chargeable or not to a federal award must be treated as direct costs to determine the indirect cost rate of the Subgrantee and to allocate the Subgrantee's share of indirect costs if they represent activities which include the salaries of personnel, occupy space, or benefit from the Subgrantee's indirect costs. (2 CFR § 200.413 (e), 45 CFR § 75.413 (e)) Direct costs of minor amounts may be treated as indirect costs under the conditions described at 2 CFR § 200.413 (d) and 45 CFR § 75.413 (d).

After direct costs have been determined and assigned directly to awards or other work as appropriate, indirect costs are those remaining to be allocated to benefiting cost objectives. A cost may not be allocated to an award as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been assigned to an award as a direct cost.

Specific Expenditures

There are certain expenditures that Subgrantees must pay close attention to as there are certain requirements that must be met in order for these expenditures to be supported and justified. This section addresses such expenditures and explains the various requirements that the Subgrantee must adhere to or have in place. Subgrantees must be aware that this is not an all-inclusive list.

Per Diem/Travel Rates

If a Subgrantee does not have its own written travel policy, the following rates apply, which are the rates established by the State of South Carolina.

1) Mileage

Every year the South Carolina Office of Comptroller General updates the mileage rate in effect for the year. The memorandum issued by the Comptroller General may be found at the Office of Comptroller General's website. The link is provided below for your convenience.

https://cg.sc.gov/guidance-and-forms-state-agencies/travel-forms-and-mileage-rate

It is the Subgrantee's responsibility to ensure that the rate in effect during the time of travel is applied.

2) Meals

Refer to the regulations promulgated by the South Carolina Office of Comptroller General under Disbursement Regulations, Regulations for Reimbursement and Subsistence Expenses found at this link:

https://cg.sc.gov/guidance-and-forms-state-agencies/cgs-accounting-policies-and-procedures

It is the Subgrantee's responsibility to ensure that the rates in effect at the time of travel are applied.

3) Lodging

Refer to the U.S. General Services Administration website at www.gsa.gov for applicable rates.

If a Subgrantee chooses to develop its own travel policy, travel costs may be charged based on actual costs, on a per diem or mileage basis, or on a combination of the two. The method applied must result in charges consistent with those normally allowed by the Subgrantee in its regular operations regardless of whether the travel costs incurred are associated with federal or non-federal activities (2 CFR § 200.474 (b), 45 CFR § 75.474 (b)). Rates adopted by a Subgrantee in its travel policy must not exceed the federal per diem rates. It is the responsibility of the Executive Director as the head of the agency to ensure that charges for lodging follow maximum lodging rates established by the U.S. General Services Administration. However, exceptions may be made, with the written approval of the Executive Director, when extenuating circumstances occur. The location and purpose of travel in addition to the extenuating circumstances must be documented. The Subgrantee must include language in its written travel policy allowing for such exceptions if it chooses to allow exceptions for extenuating circumstances.

All travel costs charged to OEO administered grants must be reasonable and properly documented, directly benefit the program, and follow established policies.

Rent

Rent paid for administrative or program activities must:

- Be reasonable and comparable to other available properties in the same market area.

- Obtain prior approval from OEO prior to entering into a rental or lease agreement on space charging $500 or more per month. The Subgrantee must provide OEO with supporting documentation of comparable properties.
- Include a termination clause in all rental and/or lease agreements.
- Shall be charged in a cost allocation method according to program requirements. Refer to individual grant agreements.
- See 2 CFR § 200.465 and 45 CFR § 75.465 for additional guidance.

Insurance

At a minimum, Subgrantees shall provide insurance coverage for real property and equipment acquired or improved with federal funds equivalent to the insurance coverage the Subgrantee provides its own property (2 CFR § 200.310, 45 CFR § 75.317) and ensure sufficient coverage of officers.

- Types of insurance coverage are Building & Personal Property, Data Processing, Automobile Liability and Collision, General Liability and Workers' Compensation and Employee Health.
- Fidelity (Tort) coverage is required to insure against financial loss.
- WAP requires Pollution Occurrence Insurance.
- All subcontractors must provide agencies and OEO with certificates of insurance representing adequate general liability coverage and when applicable, workers' compensation coverage.
- Insurance rates and premiums should be reasonable.
- Insurance, including Employee Health, will comply with procurement standards.

Contractual/Professional Services

Costs for contractual/professional and consultant services rendered by a person who possesses a special skill (excluding maintenance or repair agreements) and who is not an officer or employee of the Subgrantee are allowable. (2 CFR § 200.459, 45 CFR § 75.459) Factors to consider in determining the allowability of costs for contractual/professional services include, but are not limited to:

- All professional/consultant services in excess of $600 must receive prior OEO approval.
- The rate of compensation must be reasonable in relation to the service.
- The service must be necessary and the agency unable to provide said service.
- See Section VI. Audit of this manual for the selection of Auditors when obtaining audit services.

- How the service was accomplished in prior grant periods.
- Whether the service can be performed more economically internally rather than through a contract.

Whenever possible, the Subgrantee is encouraged to make positive efforts to utilize small businesses, minority-owned firms, women's business enterprises, and labor surplus area firms (2 CFR § 200.321, 45 CFR § 75.330). Contracts and/or agreements must include a termination provision and be in compliance with applicable procurement policies. Supporting documentation of the contract should support all of the above.

Stipends and Staff Training

Stipends are considered participant support costs. (2 CFR § 200.75, 45 CFR § 75.2) Participant support costs are costs paid to or on behalf of a participant or trainee, not an employee, for conferences or training project. Other types of participant support costs include subsistence allowances, travel allowances and registration fees. Subgrantees must obtain prior approval from OEO in order for stipends to be an allowable cost.

OEO, as the administering agency for CSBG (Youth Leadership Program), agrees to allow stipends that are directly related to the purpose and strategies of the grant program. All proposed stipends and/or wages must be submitted with the work plan to the CSBG Senior Program Manager in writing, clearly justifying the relevance to program success (e.g. Employment Skills Training/Internships). OEO will approve the stipend and/or wages with the approval of the work plan. Each client file must provide adequate documentation to support these expenditures. Clients must not be paid simply for participating in the program, attending classes. CSBG funds may not be used to reward or provide gifts or other comparable items to clients.

Training and education costs for employee development are allowable per 2 CFR § 200.472 and 45 CFR § 75.472. To be approved, OEO requires the agency to demonstrate that all staff training and education costs are directly related to the program requirements and are designed to increase the employee's effectiveness within the program.

The following information must be submitted to OEO for prior approval if stipends are being charged:

1) Identify eligibility criteria;
2) Define who's eligible;
3) Explain how you arrived at the stipend figure; and
4) Explain why the stipend is being offered (stipends are allowed for childcare, transportation, or time lost from a job to attend sessions and must be justified with receipts).

The following information must be submitted to OEO for approval if internships are being charged:

1) Must be outlined in agency's policies and procedures manual;
2) Identify eligibility criteria;

3) Define who's eligible;

4) Explain how you arrived at the hourly rate;

5) Memorandum of Understanding is required between agency and employer and must include termination policy (termination should occur as soon as possible if internship is not working appropriately); and

6) 1099 Forms must be provided to each student receiving more than a total of $600 per year for income tax purposes and tax regulations must be adhered to.

CSBG funds may not be used to pay rewards, gift cards, and/or gift certificates. Failure to comply with this section may result in a disallowance of costs incurred.

Contractor/Subcontractor Payments (WAP Only)

Prior to paying a contractor/subcontractor invoice under the WAP grant, a copy of the completed QCI Final Inspection Certification Form (see Appendix C) or OEO approved substitute form must be attached to the invoice submitted to the Subgrantee's finance/accounting department for payment. As part of OEO's fiscal monitoring, payments to WAP contractors/subcontractors and the cost center report identifying the source of funds will be reviewed to ensure compliance with this requirement.

With the implementation of NEAT/MHEA, the Subgrantee must record the **total cost** of the assistance provided regardless of how the Subgrantee is billed by the contractor or subcontractor. OEO will be reviewing Subgrantee records to ensure that the total cost of a project/assistance provided matches the total cost assigned to the project/assistance via NEAT/MHEA.

Materials Inventory (WAP Only)

To ensure inventory costs are recorded in the program year which receives the benefit, Subgrantees are to comply with the following procedures. For cumulative residual materials inventory at program year-end that is:

- Less than $5,000: The Subgrantee is to provide an itemized listing identifying the material, quantity, unit price and total costs. The total dollar amount should agree with the financial documentation (trial balance).

- Greater than $5,000: The Subgrantee is required to buy the inventory from the program with non-state, non-federal funds. Once spending is authorized for the subsequent program year, the Subgrantee can use current year program funds to repurchase the inventory. The agency buy back is to be supported by a computer-generated copy of the journal entry.

IV. Reports and Records

OEO uses the DBA FACSPro™ for budget and Financial Status Reports. Generally, reports required by OEO's Fiscal Services Department are available on DBA. Online reporting requirements must be followed.

Access to DBA FACSPro™ (DBA)

DBA is the database system used by the state for all OEO administered grants, except for ESG. Only authorized users in good standing may access DBA. All users are required to undergo SANS Training annually as well as recertify compliance with confidentiality requirements by renewing the DBA FACSPro User Confidentiality Agreement. The DBA FACSPro User Confidentiality Agreement and certificate of completion issued for SANS Training must be uploaded into the employee's electronic file in DBA annually. Users who do not complete SANS Training or submit recertification may have their DBA access suspended until such time that they become compliant with these requirements.

Subgrantees must submit a completed DBA FACSPro Employee & Volunteer Account Request Form and DBA FACSPro User Confidentiality Agreement for all new users and volunteers needing access to DBA. The DBA FACSPro Employee & Volunteer Account Request Form must also be completed for any account modifications or deactivation. All correspondence regarding DBA account access and SANS Training should be sent to DBA@admin.sc.gov. The DBA forms mentioned are available on DBA. Refer to DBA FACSPro Memorandum 19-1.

OEO may monitor compliance with these requirements through a desk monitoring or during the on-site monitoring visit.

Certification

The annual and final financial status reports or vouchers requesting payment under the agreements must include a certification, signed by an official who is authorized to legally bind the Subgrantee, which reads as follows: "By submitting this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)." (2 CFR § 200.415 (a), 45 CFR § 75.415 (a))

Financial Status Report (FSR)

All FSRs and required supporting documents (Summary of Expenditures, General Ledger Report, Trial Balance, support for journal entries and voided transactions) must be submitted by the fifteenth (15th) of the month following the reporting period unless instructed otherwise. Also refer to the Submission Policy on page 36. FSRs must be accurate, complete and submitted timely for the Subgrantee to be compliant with this reporting requirement. The final FSR requires the signature of both the Subgrantee's Executive Director and authorized representative of the finance department.

General Procedures:

1) OEO allows for a fifteen (15) percent variance in expenditures from the budget on budget line items not related to Salaries, Fringes and Indirect Cost. Variances of more than fifteen (15) percent may be permitted with OEO approval prior to the expenditure of funds.

   NOTE: Any budget line item variance must be offset by another non-personnel expense category and cannot cause the total budget to exceed the Subgrantee's total allocation or grant award. Additionally, Admin., T&TA, and Health and Safety cannot exceed approved budget allocations for the DOE Weatherization and LWAP programs.

2) It is the responsibility of the Subgrantee to ensure upon the submission of the final FSR that Indirect Cost is properly expended and reported. This may result in a negative balance, which must be approved by OEO before submission of final FSR.

3) The Total Administration fund balance of any OEO grant cannot reflect a negative balance.

4) A program closeout memo will be issued for each OEO grant. This memo will instruct Subgrantees to retain or refund the fund balance at the time of the closeout. If a refund is required, the Subgrantee should send payment with the FINAL (Closeout) FSR. If a Subgrantee is instructed to retain the fund balance, these funds will be included in the Actual Allocation for the subsequent program year.

5) If the Subgrantee has over expended the Subgrantee's allocation, the Subgrantee must not transfer revenue from another restricted source to offset the over expenditure. The Subgrantee may, however, move expenditures out to another source of funds. (2 CFR § 200.405 (c), 45 CFR § 75.405 (c))

6) No revisions in the Final (Closeout) FSR will be allowed after the closeout period. Any changes to fund balance after the closeout period will be reviewed during OEO's Fiscal Monitoring process and combined with any other disallowed cost.

7) In addition to the WAP closeout FSR, OEO requires submission of the Materials Inventory Report or copy of the journal entry transferring the value of the inventory on hand at the close of the grant period in line with materials inventory procedures identified on page 34 of this manual.

8) The final WAP FSR has been updated to include the reporting of program income.

9) All obligations of grant funds should be paid by the grant closeout. Therefore, there should be no obligations listed on the final FSR. If obligations exist, they must be supported by agency accounting system generated A/P ledger and clearly identified why they remain outstanding.

10) OEO maintains the right to request additional information from the Subgrantee.

<u>Submission Policy</u>

Effective July 2018, the calendar feature in DBA was replaced with a Submit FSR feature, which when clicked, automatically time-stamps the date of submission.

With the implementation of this submit feature, FSRs may no longer be retroactively dated. As such, any FSR submitted after 11:59 pm on the 15th of the month will be indicated in the FSR Status column as Submitted Late.

Un-Submit Feature

Located directly beside the Submit FSR button, Subgrantees will find an Un-Submit button. Subgrantees may utilize this feature should they wish to add or edit information after an FSR was submitted. This feature will be available for Subgrantees to use without requiring OEO approval until such time that an OEO employee begins to review the FSR. This will be denoted in DBA FACSPro in the FSR status column as "Under Review." After a review of the FSR has begun, the Un-Submit button will be unavailable.

When the Un-Submit button feature is utilized, a "Notes" box will appear and requires that Subgrantees detail all the intended changes in writing prior to making any changes to the FSR. Subgrantees are encouraged to enter thorough notes.

Rejection Policy

The OEO maintains the ability to reject an FSR. If the OEO rejects an FSR, it will require notes be included detailing the reason for rejection. To ensure complete and accurate information be submitted, DBA FACSPro will prevent a Subgrantee from submitting an FSR if the prior month's FSR is rejected.

Non-Receipt and Request for Additional Information

As a recipient of federal funds, OEO is required to ensure that appropriate fiscal controls and program procedures are in place to assure proper accounting, timely and effective disbursal of public funds. OEO state plans and grant agreements outline specific provisions for Subgrantee responsibilities and reporting requirements, and those include: Financial Status Reports (FSR), Household Reports, Program Status Reports (PSR), IS Reports, ROMA Reports, program budgets and budget narratives.

Notice of Non-Receipt

When OEO has not received a budget by the date indicated in the program allocation letters or for FSRs by the fifteenth (15th) of each month of the FINAL FSR by the closeout period, a written Notice of Non-Receipt will be sent to the Subgrantee's Executive Director and authorized representative of the finance department.

Request for Additional Information

When OEO receives an incomplete budget or FSR, a Request for Additional Information Notice will be issued and the report will be considered pending until corrections are received. OEO remains committed to continuing a review of internal policies to assist in the elimination of unnecessary delays to accelerate reporting and the approval processes. We respectfully request each Subgrantee's assistance in improving this process at the Subgrantee level by assuring timely, complete and accurate reporting. Moreover, the information provided is what OEO uses to prepare its reports to the federal grantor agency, which may affect appropriations and program services.

Failure of a Subgrantee to submit the FSRs when due, or provide additional documents as requested may be considered noncompliant, which may result in OEO imposing special conditions on the Subgrantee. See section V. Corrective Action, Special Conditions of this manual.

Closeout

Subgrantees are required to perform a closeout for all grants, including Project Share. A closeout is performed when the Subgrantee performed all applicable administrative actions and required work pertinent to the federal award. The dates when the closeout documents are due to OEO are listed below:

Grant	Date Closeout Due to OEO
CSBG (ending December 31)	February 15
LIHEAP (ending December 31)	February 15
WAP (ending March 31)	May 15
Project Share (ending June 30)	July 15
LWAP (ending October 31)	December 15

Failure to adhere to the due dates above may result in noncompliance. Moreover, it is imperative that Subgrantees submit their respective closeout documents on time as this affects when OEO is subsequently able to report the information to the federal awarding agency.

The closeout process does not affect a federal agency's or OEO's right to disallow costs and recover funds on the basis of later fiscal monitoring or other reviews. (2 CFR § 200.344, 45 CFR § 75.386)

Review Procedures for Program Year Closeouts

A fiscal closeout package includes:

1) Completed FSR: The FSR must be completed for the full program year. The final allocation, revenue received and approved budget should be included in the report. The year-to-date expenditures and revenue must agree with all previously reported expenditures and revenue to the financial system reports provided as support. The Final FSR must be signed by the Subgrantee's Executive Director and an authorized representative of the finance department (i.e. Director of Finance, Chief Finance Officer, etc.).

   When completing the FSR, the Subgrantee must consider certain conditions including, but not limited to, the following:

   a) Total administration expenses must not be a negative amount;

   b) Expenditures should not exceed the fifteen percent (15%) allowable variance in non-personnel line items;

      NOTE: Any budget line item variance must be offset by another non-personnel expense category and cannot cause the total budget to exceed the Subgrantee's total allocation or grant award. Additionally, Admin., T&TA, and Health and Safety

cannot exceed approved budget allocations for the DOE Weatherization and LWAP programs.

c) Expenditures should not exceed funding levels.

d) The Final FSR should not include any obligations.

e) Salaries and salary related line items should not exceed the approved budget.

f) The total clients served must be reported.

2) Supporting Financial Documents: These include, but are not limited to, the Subgrantee's trial balance, general ledger detail, supporting documents for journal entries and voided transactions, accounts payable report, and Carry-Forward Funds Closeout Form. In gathering all supporting financial documents, the Subgrantee must consider the following:

a) The revenue must agree with the actual funds received from OEO for the program year.

b) The Subgrantee must practice sound accounting principles when establishing accruals at the end of each program year. The expenditure must have been incurred within the program year and supported by appropriate documentation.

c) No listing of "Due To" or "Due From" (represents a type of loan, which is not allowed) – all transactions will be complete by the submission of the final FSR.

d) All accounts payable items should be supported by an itemized list identifying the vendor invoice, dates, amounts and justification.

e) Financial documents will represent the year-to-date expenditures on the FSR.

f) A reconciliation is required if multiple financial documents are submitted to calculate the year-to-date expenditures.

g) The cash balance on the financial documents must agree with the unexpended funds amount reported on the FSR. If not, the Subgrantee must provide a detailed reconciliation of the cash balance.

h) Indirect costs will be properly charged by the closeout and the expense to the grant will represent the most current applicable rate to the grant period.

3) Program Reports: The required program report(s) will depend on the federal award being closed out. Examples of required program reports are Household, PSR, ROMA, IS, etc.

4) Check for the program fund balance made payable to the Office of Economic Opportunity.

5) WAP Requirements: WAP dwellings must be completed prior to the close of the WAP grant. The FSR must also include the number of dwellings completed for the program year. A materials inventory recap report and a copy of the journal entry transferring the value of inventory must be provided.

To assist with the closeout process, a copy of the review procedures will be provided with each program closeout memorandum.

Record Retention

Subgrantee must retain all records (financial and statistical records, supporting documents, etc.) related to a federal award for a period of three years from the date of approval of the final expenditure report. Exceptions to these requirements include, but are not limited to, the following:

- If a litigation, claim or audit is started before the expiration of the three-year period, please contact OEO for retention period requirements.
- All records of real property and equipment purchased with federal funds must be retained for three years after the final disposition.
- The three year retention period does not apply to the Subgrantee if records are transferred to or maintained by the federal awarding agency or the pass-through entity.
- The Subgrantee may be notified in writing to extend the retention period by the federal awarding agency, OEO, or cognizant agency.
- If a Subgrantee is required to report program income after the period of performance, the retention period for program income records begins at the end of the Subgrantee's fiscal year in which the program income was earned.

Refer to 2 CFR § 200.333 and 45 CFR § 75.361 for more information regarding record retention requirements.

Subgrantees are required to maintain sanitization records of computing devices for a minimum of three (3) years from the date of disposal of the computing device. Refer to Equipment/Asset Disposal (Surplus Property) on page 20.

V. Corrective Actions, Special Conditions

As the pass-through entity, OEO has the discretion to place a Subgrantee under corrective action and impose additional conditions to the grant.

Administrative Enforcement

Administrative Enforcement remedies do not preclude the Subgrantee from being subject to "Debarment and Suspension" or Termination. In administering the following, the Grantee has adopted Administrative Requirements for Governments; often referred to as the "Common Rule" (Tab 300, Sec. 43). Administrative enforcement will begin when a Subgrantee: (a) fails to comply with the terms of the award, whether stated in local, state, or federal law and/or regulations, the state plan, the grant agreement or any other Memoranda relied upon and distributed by Grantee; and/or (b) work products are not submitted within the required time frame; and/or (c) reporting is not completed in accordance with generally accepted accounting principles; and/or (d)

performance is not consistent with the approved budget, work plan and/or grant agreement; and/or (e) when a Subgrantee:

1) Sustains a documented history of unsatisfactory performance over at least two (2) Grantee Monitoring's;

2) Experiences an adverse material change in financial condition at any time during the term of this agreement that affects the Subgrantee's ability to perform any portion of this agreement;

3) Exhibits a lack of internal management controls;

4) Provides any representation to Grantee that shall at any time be false or misleading in any respect;

5) Does not submit required reports timely or reports are submitted with incorrect, incomplete or insufficient information;

6) Fails to complete in a timely manner any of the approved services, goals and objectives outlined in the work plan;

As the unsatisfactory performance and non-compliances persist, the Grantee may exercise one or more of the following options, as appropriate to the circumstances:

1) Conduct comprehensive Grantee Team monitoring on-site and interim project monitoring that may be announced and/or unannounced;

2) Require the Subgrantee to obtain additional technical and/or management assistance;

3) Establish additional prior approvals from Grantee;

4) Require additional financial reports and/or data;

5) Place the Subgrantee on "High Risk" status;

6) Wholly or partly suspend the current grant agreement;

7) Issue payment to the Subgrantee on a reimbursement basis;

8) Require reimbursement of Grant funds expended contrary to the terms of this agreement, the work plan, the state plan, local, state and/or federal laws and regulations, and/or memorandum relied upon and distributed by Grantee, from non-state, non-federal funds;

9) Require the Subgrantee to develop a corrective action plan, which must be approved by the Grantee and include a time from for completing the corrective actions;

10) Require Board acknowledgement of agency's status; and/or

11) Establish additional constraints Grantee deems to be necessary and appropriate under the circumstances.

If the Grantee decides to impose such special grant conditions, the Grantee will notify the Subgrantee as early as possible, of the following:

1) The nature of and reason for the special conditions and/or restrictions;

2) The method of appeal for reconsideration of the imposed conditions/restrictions; and

3) If appropriate, the training and technical assistance the Grantee is offering to the Subgrantee to help correct the deficiency.

4) If training and technical assistance are not appropriate, the Grantee will detail the reason why.

Cost Reimbursement Method of Funding

The following instructions were developed by OEO to assist Subgrantees who have been placed on the Cost Reimbursement method of funding. These instructions must be followed for every Payment Request/Invoice submitted to OEO Fiscal Services Department for reimbursement.

Under the Cost Reimbursement method of funding, the ***Subgrantee is required to finance its operations with its own working capital***. OEO payments to the Subgrantee shall serve as reimbursement for the Subgrantee's actual cash disbursements supported by adequate documentation. Costs shall only be reimbursed when incurred costs were paid by the Subgrantee. If the Subgrantee does not follow these requirements, OEO will be unable to review and process the submitted reimbursement request(s) and the entire package will be returned to the Subgrantee.

All Payment Requests with appropriate documentation must be submitted to the Office of Economic Opportunity – Fiscal Services Department 1205 Pendleton Street, Columbia, SC 29201. Please contact OEO Fiscal Services Department at (803) 734-0662 if you have any questions.

Reimbursement Guidelines

To efficiently process the Subgrantee's Payment Request for reimbursement, it is essential that Subgrantees follow the specific guidelines provided below.

1) Payment Request/Invoice
   All Subgrantees on Cost Reimbursement are required to submit a separate Payment Request or Invoice (see Attachment A) for each subsequent grant when requesting reimbursement. Payment Request(s)/Invoice(s) can be submitted as often as weekly, but not less than biweekly. Please allow a minimum of two weeks (from the received date of the Invoice) for OEO to complete the approval process and disburse the requested funds.

2) Summary Cover Sheet
   Accompanying each Payment Request should be a Summary Cover Sheet. This summary page should include the following information: check number(s); date of check(s); payee and amount of expense claimed; the type of supporting documentation attached (invoice, receipt, contract, support for personnel compensation, etc.); and a brief explanation of the purpose of the expense.

Summary Cover Sheets must be complete, accurate, and well organized. Pages should be numbered or grouped to facilitate cross-referencing of checks and supporting documentation. For the first Payment Request submitted by a Subgrantee, the initial number of transactions documented should be small so that any deficiencies in the submission that are identified by the reviewer can be corrected with the minimum amount of effort.

- Listing of Cancelled Checks/Charges – each cancelled check/charge should be listed sequentially by check number.
- Date Check Written/Charge Incurred – provide the date that the check was written or the charge was incurred.
- Payee – identify to whom the check was written.
- Total Amount of Expenses – the total amount of the expenses reflected in the corresponding check. An explanation in the form of a footnote must be provided if the total amount of the check is different than the amount used in the supporting documentation.
- Forms of Documentation – identify the type of supporting documentation (i.e. invoice, contract, receipt, etc.).
- Explanation – provide a brief explanation of the purposes for which the costs were incurred (if not self-evident by the payee).
- Signatures – the Summary Cover Sheet must be signed and dated by both the preparer and the authorizing official (Executive Director). The preparer should ensure that the Summary Cover Sheet and supporting documentation are organized and easy to follow.

3) Appropriate Forms of Documentation
To be reimbursed for allowable expenses, the Subgrantee must provide evidence that costs were incurred and paid. Payment Request(s) must be supported by appropriate documentation for the allowable expenditures incurred and paid on the grant. If you are unsure whether a particular expenditure is allowable; consult your approved budget and/or the appropriate section of 2 CFR Part 200 and 45 CFR Part 75.

The appropriate forms of documentation include copies of the following: approved vendor invoice(s); receipt(s); bank statement(s); electronic reference(s); or contract(s). All documentation must be supported by a check copy. All forms of supporting documentation for each expense must be legible, approved by an authorizing official (i.e. Program Manager, Finance Manager, and Executive Director), coded to reflect the corresponding grant(s) and the information must be arranged in the same order as the checks identified on the Summary Cover Sheet.

4) Personnel
For reimbursement of personnel costs, salaries and wages are required to be supported by records documenting the work performed. (2 CFR § 200.430 (i), 45 CFR § 75.430 (i)) Subgrantees must have an internal control system in place providing reasonable assurance that personnel charges are allowable, accurate, and appropriately allocated.

Supporting documents must reasonably capture all work performed by the Subgrantee's employees for all work performed compensated by both federal and non-federal funds. Subgrantees may use budget estimates for interim accounting purposes, however, such budget estimates will not suffice as supporting documentation for personnel charges to federal grants.

Subgrantees are no longer required to provide personnel activity reports, but may choose to do so. What is required, however, is that the supporting documentation of personnel costs comply with 2 CFR § 200.430 (i) and 45 CFR § 75.430 (i).

Please be certain that the personnel documentation indicates the total amount of wages and fringe benefits, the net amount of the paycheck, and the amount of wages and fringe benefits applicable to the corresponding grant.

Please submit copies of payroll registers or payroll reports indicating the gross salary and wage amounts or additional amounts paid related to FICA, retirement, and health insurance. OEO may require additional information if the supporting documents provided are determined to be insufficient and/or require additional support.

5) Travel
Reimbursement of a Subgrantee's travel expenses that directly benefit the program will require copies of travel vouchers reporting the dates, points of travel, conference agenda and the purpose for the travel. A separate travel voucher must be completed and signed by each person traveling during the reimbursement period. Copies of receipts must be submitted for hotel bills and common carriers (i.e. airlines). Receipts are not required for meal reimbursement by Subgrantee employees in travel status. Refer to Per Diem/Travel Rates on page 30.

6) Supplies
Provide copies of approved invoices and receiving reports for purchase of all supplies.

7) Equipment
Provide copies of approved invoices for equipment rental or purchases.

8) Contractual
Actual expenditures for program speakers and consultants must be documented by providing copies of contractual agreements. In addition, documentation of the time, date, location and meeting agenda must also be provided. Sign-in list(s) should be completed during seminars or meetings and a copy of the list(s) must be submitted with the contractual documentation.

9) Other
Other costs such as room rent, postage, and utilities should be documented by the Subgrantee by providing copies of rental agreements, postage receipts and utility bills.
Additionally, a credit card statement is not a valid form of documentation for reimbursement. The corresponding receipts need to be attached to support all valid purchases listed on the relevant credit card statement(s).

VI. Audit and Monitoring

This guidance is to set forth the standards as required by federal regulations and to adhere to the CSBG Organizational Standards established by HHS on January 26, 2015 in Transmittal No. 138. This was done in conjunction with §6788 of the CSBG Act. The CSBG Organizational Standards 7 and 8 are attached as part of this manual at Appendix D.

Community Action Agencies must adhere to the following:

Standard 8.1 The organization's annual audit is completed by a Certified Public Accountant on time in accordance with federal regulations.

Standard 8.2 All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

Standard 8.3 The organization's auditor presents the audit to the governing board.

Standard 8.4 The governing board formally receives and accepts the audit.

Standard 8.5 The organization has solicited bids for its audit within the past five (5) years.

For additional guidance on the annual audit report, refer to 2 CFR §§ 200.501 - 200.521 and 45 CFR §§ 75.501 - 75.521.

Single Audit

A. Audit Requirements
Subgrantees are required to have a single or program-specific audit conducted when federal award expenditures equal or exceed $750,000 per fiscal year as noted at 2 CFR § 200.501 (a) and 45 CFR § 75.501 (a). The single audit performed must be compliant with the requirements set forth at 2 CFR § 200.514 and 45 CFR § 75.514. Moreover, OEO is given the authority to pursue remedies for noncompliance as provided for in 2 CFR § 200.338 and 45 CFR § 75.371. Refer to 2 CFR § 200.501 (c) and 45 CFR § 75.501 (c) for program-specific audits.

Subgrantees must give the auditor access to personnel, accounts, books, records, supporting documentation and other information as needed for the auditor to perform the required audit. (2 CFR § 200.508 (d) and 45 CFR § 75.508 (d))

B. Audit Costs
Professional fees associated with audits are allowable charges if made in compliance with 2 CFR § 200.425 and 45 CFR § 75.425 and may be allocated as an indirect cost.

C. Selection of Auditors
The Subgrantee's objective in procuring audit services should be to obtain high-quality audits. The Subgrantee must solicit bids for audit services at least every five (5) years per CSBG Standard 8.5. Subgrantees must also:

1) Adhere to its own documented procurement policies, which must incorporate applicable state and local laws and regulations;

2) Clearly state the objectives and scope of the audit in its request for proposal;

3) Obtain a copy of the auditor's peer review report per 2 CFR § 200.509 (a) and 45 CFR § 75.509 (a);
4) Consider such factors as the audit Subgrantee's relevant experience, professional qualifications and technical skills of the audit Subgrantee's available staff, results of the peer review and any external quality control review, and price;

5) Take positive efforts to procure audit services from small businesses, minority-owned firms, and women's business enterprises.

At a minimum, procurement of audit services shall include advertisement of the Request for Proposal in the South Carolina Business Opportunities newsletter, published by the State Fiscal Accountability Authority, and the newsletter of the South Carolina Association of Certified Public Accountants. If an auditor prepares the Subgrantee's indirect cost proposal or cost allocation plan, and the Subgrantee's indirect costs recovered from the prior year exceed $1 million, the same auditor may not be utilized to perform audit services.

In line with the Sarbanes-Oxley Act of 2002 Sec. 203, an incumbent auditor can submit bids for consecutive subsequent period; however, the lead auditor or audit partner responsible for reviewing the audit may provide such services for no more than five (5) consecutive fiscal years. After such time, a new lead auditor or audit partner shall be appointed.

D. Financial Statements & Schedule of Expenditures of Federal Awards
Subgrantees are required to prepare financial statements reflecting the Subgrantee's financial position, results of operations or changes in net assets, and, where appropriate, cash flows for the fiscal year audited. Subgrantees are also required to prepare a schedule of expenditures of federal awards (SEFA) for the same fiscal period. The SEFA must list the total federal awards expended as determined in accordance with 2 CFR § 200.502 and 45 CFR § 75.502.

E. Independent Audit Report Submission
It is the Subgrantee's responsibility to ensure that the audit report, data collection form (Form SF-SAC) and reporting package are complete and submitted to the Federal Audit Clearinghouse (FAC) within the earlier of thirty (30) calendar days after receipt of the auditor's report, or nine (9) months after the end of the Subgrantee's fiscal year end. This requirement is not met so long as the FAC has not accepted the Subgrantee's filing. The FAC will notify the Subgrantee via email as to the status of its submission. If the FAC rejected the submission for any reason, the Subgrantee must immediately resolve the issue. The requirement of a Subgrantee to submit the reporting package to the FAC is not complete so long as the FAC has not accepted the Subgrantee's submission.

The reporting package must include the following:

1) Financial statements and SEFA (see 2 CFR § 200.510 and 45 CFR § 75.510);

2) Summary schedule of prior audit findings (2 CFR § 200.511 (b) and 45 § 75.511 (b));

3) Auditor's report(s) (2 CFR § 200.515 and 45 CFR § 75.515); and

4) Corrective action plan (2 CFR § 200.511 (c) and 45 CFR § 75.511 (c)).

It is the Subgrantee's responsibility to ensure that personally protected identifiable information is omitted from the reporting package. The data collection form must be completed and signed by a Subgrantee senior level representative (i.e. director of finance, chief executive officer, or chief financial officer) and the auditor where applicable. Refer to 2 CFR § 200.512 and 45 CFR § 75.512 for more information.

In addition, all Subgrantees must submit their single audit report to OEO within thirty (30) calendar days after receipt of the auditor's report(s), or nine (9) months after the end of the audit period, whichever comes first. All Subgrantees were notified of this requirement in a memorandum dated July 6, 2016. Refer to 2 CFR § 200.507 (b)(2) and 45 CFR § 75.507 (b)(2) for program-specific reporting requirements.

F. Independent Audit Report

The audit report must specifically state that the audit was conducted in accordance with 2 CFR § 200.515 and 45 CFR § 75.515 and shall include the following:

1) An opinion or disclaimer of opinion as to whether the financial statements are presented fairly in all material respects in accordance with GAAP and an opinion or disclaimer of opinion as to whether the SEFA is fairly stated in all material respects in relation to the financial statements as a whole.

2) A report on internal control over financial reporting and compliance with provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a material effect on the financial statements. The report must describe the scope of testing of internal control and compliance and the results of the tests, and where applicable, it will refer to the separate schedule of findings and questioned costs described at 2 CFR § 200.515 (d) and 45 § 75.515 (d).

3) A report on compliance for each major program and a report on internal control over compliance. The report must describe the scope of testing of internal control over compliance, include an opinion or disclaimer of opinion as to whether the auditee complied with federal statutes, regulations, and the terms and conditions of federal awards which could have a direct and material effect on each major program and refer to the separate schedule of findings and questioned costs described at 2 CFR § 200.515 (d) and 45 § 75.515 (d).

4) A schedule of findings and questioned costs, which must include the following (refer to 2 CFR § 200.515(d) and 45 § 75.515 (d) for more detail):

   a) A summary of the auditor's results;

   b) Findings relating to the financial statements which are required to be reported in accordance with GAGAS; and

   c) Findings and questioned costs for federal awards which must include audit findings as defined at 2 CFR § 200.516 and 45 § 75.516.

The audit report need not follow the order or format listed above. However, the information and statements identified above must be included in the audit report.

The Subgrantee is required to include a summary schedule of prior audit findings. All prior audit findings must be included in the list. Corrected prior audit findings must still be listed stating that corrective action was taken. Prior audit findings not corrected or only partially corrected must include an explanation as to why the findings recurred and the Subgrantee's planned corrective action in addition to any partial corrective action already taken. An explanation is required when the corrective action taken differs significantly from the previously reported corrective action plan. (2 CFR § 200.511 (b)(2) and 45 § 75.511 (b)(2))

The auditee is required to prepare a corrective action plan for all findings identified by the auditor. The corrective action plan must include the following (see 2 CFR § 200.511 (c) and 45 § 75.511 (c)):

1) The name of the contact person responsible for the corrective action;

2) The corrective action planned;

3) The anticipated completion date; and

4) An explanation and specific reason(s) as to why the auditee does not agree with the audit findings or believes that a corrective action is not required.

OEO Monitoring

As a pass-through agency of federal awards, OEO and/or its authorized representative(s) perform fiscal monitoring activities to ensure that a Subgrantee's expenditures of federal awards comply with applicable laws, regulations, grant agreement provisions, and any other applicable requirements for the expenditure of federal awards. Part of OEO's fiscal monitoring activities include, but are not limited to, a desk review of the Subgrantee's single audit report, a review of whether the Subgrantee has taken appropriate and timely corrective action on any issues identified, a follow up on prior year's fiscal monitoring findings, and a review of expenditures reported on FSRs submitted to OEO. Refer to 2 CFR § 200.331 for more information regarding OEO's responsibilities as a pass-through entity.

OEO will perform fiscal monitoring on-site visits. OEO may or may not give advance notice of an on-site visit. A fiscal monitoring report will be issued at the conclusion of an on-site monitoring visit. All Subgrantees are required to provide OEO access to documents, papers, or other records of the Subgrantee that OEO requests which are pertinent to the federal award(s) under review. This access must also be afforded to any authorized representative of OEO, such as a firm engaged to perform fiscal monitoring activities on behalf of OEO. (2 CFR § 200.336 and 45 § 75.364)

Desk Review of Single Audit

All single audit reports submitted to OEO undergo a desk review. The desk review is an assessment of whether the audit and federal expenditures of OEO administered grants are compliant with 2 CFR § 200.500 et al, 45 CFR § 75.500 et al, Government Auditing Standards, generally accepted auditing standards, generally accepted accounting principles, and all

applicable laws, regulations, contracts and grant agreements. OEO will determine audit acceptability, ascertain Subgrantee compliance, examine questioned costs and findings reported, determine grant agreement violations, determine any fund balances due to OEO and identify any areas of concern that OEO may potentially address with monitoring activities. For each audit finding related to OEO administered grants, OEO will issue a management decision. (2 CFR § 200.521 and 45 CFR § 75.521) Additional information or documentation may be requested at any time during the desk review, and OEO may perform additional work as deemed necessary.

The desk review will be performed and any management decisions necessary will be issued within six (6) months upon acceptance of the audit report by the FAC. All Subgrantees are required to submit their single audit report to OEO within thirty (30) calendar days after receipt of the auditor's report(s), or nine (9) months after the end of the period audited, whichever comes first. An electronic copy is preferred, and may be emailed directly to kimberly.cosare@admin.sc.gov. Failure to comply with this requirement may result in OEO taking corrective action to address the noncompliance of the Subgrantee. An analysis of program activity with a separate analysis for indirect cost will be performed. An indirect cost analysis will be performed using the corresponding indirect cost rate agreement for the fiscal year audited. Analysis of program variances will be performed for completed program years while partial year program variances considered material may be subject to sampling.

Questioned costs identified in the single audit will be reviewed. OEO may require additional information from the Subgrantee to address questioned costs. OEO may also perform additional work to determine whether the issues associated with the questioned costs have been appropriately corrected and addressed by the Subgrantee. The report will identify whether each questioned cost is an allowed or disallowed cost, the amount of funds involved, if any, and the total sum in question for each OEO program.

Results of the desk review, management decisions and indirect cost analysis will be communicated and addressed to the Executive Director, unless otherwise requested, in writing, by the Subgrantee's Board of Directors. If issues or areas of concern are identified requiring a response from the Subgrantee, the Executive Director will have thirty (30) days from the date of the letter and/or report to respond to OEO, unless otherwise stated. If OEO does not receive a response from the Subgrantee within the timeframe given, the Subgrantee will be considered noncompliant and OEO may take corrective action measures including, but not limited to, suspension of future funding.

Fiscal Monitoring

OEO will perform fiscal monitoring at least:

- once every three years for CSBG and LIHEAP;
- once a year for WAP; and
- continuous monitoring (cost reimbursement method) for ESGP.

The purpose of fiscal monitoring is to ensure that all Subgrantees are compliant with applicable federal and state fiscal requirements, and that Subgrantees are proper stewards of federal funds. See 2 CFR § 200.331 and 45 CFR §75.352 for more detailed information.

Desk Monitoring

A Subgrantee may be randomly selected during the year for a desk monitoring. This additional form of monitoring was implemented to assist OEO with its monitoring requirements and identify potential needs for training and technical assistance. Desk monitorings may also potentially shorten a Subgrantee's on-site field monitoring.

OEO Fiscal Monitoring Staff will inform the Subgrantee of the desk monitoring and provide a list of documents that must be provided to OEO. The Request for Additional Information is the form used by OEO listing the documents needed. A sample Request for Additional Information is provided at Appendix E. **Documents containing protected personally identifiable information (protected PII), defined at page 5, should not be emailed to OEO.** The items reviewed in the desk monitoring may include, but are not limited to cash, revenue, indirect cost and expenditures. Supporting documentation that may be requested before or during a desk monitoring may include, but are not limited to invoices, journal entries, trial balance, check register, bank reconciliation (see Appendix F for a sample summary bank reconciliation) and bank statement. Items selected for review may be randomly or judgmentally selected from the Subgrantee's general ledger detail.

It is OEO's intent to finalize the desk monitoring within 10 days once all requested documentation and information is received from the Subgrantee. The results of the desk monitoring will be communicated with the Subgrantee via written correspondence (memorandum) and will be incorporated into the field monitoring.

Field Monitoring

OEO on-site fiscal monitoring objectives include, but are not limited to, an assessment of the Subgrantee's internal controls, cash management, ensuring assets have the proper documentation and are properly maintained, accruals are properly supported, balance sheet and income statement accounts are used in a consistent manner to ensure comparability, client assistance eligibility, proper procurement standards and a review of human resources policies and procedures. OEO will sample expenditures to ensure payments are adequately supported with the proper documentation and that payments are compliant with OEO grant agreements, budget requirements and applicable laws, regulations, policies and procedures.

OEO will send a notification letter to the Executive Director of OEO's scheduled field monitoring with a list of documents and information the Subgrantee must provide prior to the on-site visit and/or be made readily available upon arrival. Additional documents may be requested as needed during the field monitoring and after the on-site visit.

Upon arrival, OEO staff will conduct an entrance conference with the Subgrantee's Executive Director as well as other staff determined by the Subgrantee.

At the conclusion of the monitoring, OEO staff will conduct an exit conference with the Subgrantee's Executive Director, as well as other staff as determined by the Subgrantee. This conference may be held in person or by phone. The preliminary results of the monitoring will be discussed, which may include the following:

- Agency strengths;
- Items the Executive Director should be made aware of as determined by OEO;
- Documents the Agency still needs to provide to OEO;

- Items found during the monitoring visit that need to be addressed by the Subgrantee; and
- Items that may not rise to the level of concern, but that OEO determines must be addressed by the Subgrantee.

It is OEO's intent to discuss all items at the exit conference to promote transparency prior to the issuance of the monitoring report. However, items not discussed at the exit conference may still be included in the monitoring report due to further analysis of data or new information obtained after the exit conference.

OEO may perform on-site fiscal monitoring activities without notifying the Subgrantee prior to the visit. In such instances, OEO will inform the Executive Director upon arrival at the Subgrantee's premises.

Subgrantee Fiscal Monitoring Responsibilities

The Subgrantee is responsible for preparing all documents requested, responding within the required timeframe and developing a corrective action plan and/or quality improvement plan as needed. Access to personnel, documents, books, accounts, papers, and any records requested by OEO or any of its authorized representatives in order to perform fiscal monitoring activities is required. If access is denied or any documents or records are not provided, the Subgrantee may be considered noncompliant, which may result in OEO taking corrective measures.

The results of the monitoring will be communicated to the Executive Director and Board Chairperson of the Subgrantee. The Executive Director must submit to OEO the required documentation (supporting documents, corrective action plan, quality improvement plan) noted in the monitoring report to address the findings and/or issues identified in the report. The required timeline for submission of such document(s) will be noted in the monitoring report. The corrective action plan and/or quality improvement plan must be submitted to OEO within the timeframe identified on the monitoring report, unless otherwise noted on the report. The corrective action plan and/or quality improvement plan must include the name(s) of the contact person(s) responsible for the corrective action, the corrective action planned, and the anticipated completion date. Follow-up fiscal monitoring may occur depending on the Subgrantee's response to the fiscal monitoring report.

Payments of Disallowed Cost

Disallowed costs shall be payable to OEO within 30 days from the date of the correspondence identifying disallowed costs. Only non-federal, non-state funds may be used to satisfy disallowed costs. If costs are disallowed during the grant period, non-federal or non-state funds must be used to return the funds to the grant. Payment methods permitted to satisfy disallowed costs are as follows:

1) Lump-sum Payment
   OEO must receive the total disallowed amount within the aforementioned period. If the Subgrantee is financially unable to make full payment within this time frame, the Subgrantee must inform the OEO Director in writing within 15 business days of the date of the correspondence identifying the disallowed costs. The Subgrantee will be subject to an OEO Fiscal Monitoring to document the non-federal/non-state funds available for repayment of delinquent debt.

2) Installment Payments
Subsequent to verification of the Subgrantee's inability to repay in lump-sum, OEO may establish a written agreement binding the Subgrantee to the terms and methods outlined. The standard repayment period is 12 months, not to exceed a 36 month maximum time allowance. Monthly payments will be due to OEO by the fifteenth (15th) of each month. Quarterly payments will be due to OEO by the fifteenth (15th) day of the last month in the quarter.

3) Delinquent Payments
If a Subgrantee fails to repay funds within the required timeframe, and the requirements set forth in 2 CFR Part 200, 45 CFR Part 74, and 4 CFR Chapter 11-Federal Claims Collection Standards (General Accounting Office – Department of Justice) may be exercised in the collection of delinquent debt.

CLIENT REFUND FORM

Agency Name: _____ **Date:** _____
Street Address: _____
City, State, Zip Code: _____

Client Name:	System ID#:	Date of Benefit/Voucher:	Vendor:	Federal Award ID#:	Check #:	Refund Amount:
					Total:	$ 0.00

Preparer's Signature **Date:**

Executive Director's Signature **Date:**

Reason for Refund and/or Additional Refund Disclosures:

Please include the 'Customer Report' printout from DBA with all Client Refunds.
Please make all checks payable to the "Office of Economic Opportunity".

Certification Regarding
Debarment, Suspension, and Other Responsibility Matters
Primary Covered Transactions

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 13 CFR Part 145. The regulations were published as Part VII of the May 26, 1988 *Federal Register* (pages 19160-19211). Copies of the regulations are available from local offices of the U.S. Small Business Administration.

(BEFORE COMPLETING CERTIFICATION, READ INSTRUCTIONS ON REVERSE)

(1) The prospective primary participant certifies to the best of its knowledge and belief that it and its principals:

(a) Are not presently debarred, suspended, proposed for disbarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective primary participant shall attach an explanation to this proposal.

Business Name _____

Date _____

By _____
Name and Title of Authorized Representative

_____
Signature of Authorized Representative

INSTRUCTIONS FOR CERTIFICATION

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If is is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is submitted for assistance in obtaining a copy of those regulations (13 CFR Part 145).

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the ineligibility of its principals. Each participant may, but is not required to, check the Nonprocurement List.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

South Carolina
QCI Final Inspection
Certification Form

This form certifies that the dwelling had a final inspection by a certified QCI and that all work met the required standards.

QC Inspector's Name: _____ Agency: _____

Client Name / Address: _____

Date: _____

The QCI:

1) ____ **Verified** worker compliance with safety rules.

2) ____ **Evaluated** client satisfaction with in-process and final work:

3) ____ **Reviewed** the client file structure, ensuring that approved forms were completed and signed appropriately.

4) ____ **Assured** that the work order and specifications provided adequate guidance and were understood by the retrofit installers.

5) ____ **Assured** that the work order was implemented as recommended by the dwelling assessment and incorporated the diagnostics.

6) ____ **Assured** that any unusual situations were appropriately addressed and that sufficient documentation was provided to support any changes.

7) ____ **Determined** Pass/Fail of the work, assuring that the installation and materials followed building and safety codes, 10 CFR 440 Appendix A, SWS, and the SC Field Guide.

8) ____ **Confirmed** the proper allocation and documentation of source of funds.

Comments: _____

_____

_____

Signature of Certified QCI _____

Standard 7.1 • private The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

Standard 7.2 • private The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.

Standard 7.3 • private The organization has written job descriptions for all positions, which have been updated within the past 5 years.

Standard 7.4 • private The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.

Standard 7.5 • private The governing board reviews and approves CEO/executive director compensation within every calendar year.

Standard 7.6 • private The organization has a policy in place for regular written evaluation of employees by their supervisors.

Standard 7.7 • private The organization has a whistleblower policy that has been approved by the governing board.

Standard 7.8 • private All staff participate in a new employee orientation within 60 days of hire.

Standard 7.9 • private The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.

Standard 8.1 • private The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.

Standard 8.2 • private All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

Standard 8.3 • private The organization's auditor presents the audit to the governing board.

Standard 8.4 • private The governing board formally receives and accepts the audit.

Standard 8.5 • private The organization has solicited bids for its audit within the past 5 years.

Standard 8.6 • private The IRS Form 990 is completed annually and made available to the governing board for review.

Standard 8.7 • private The governing board receives financial reports at each regular meeting that include the following:

1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and
2. Balance sheet/statement of financial position.

Standard 8.8 • private All required filings and payments related to payroll withholdings are completed on time.

Standard 8.9 • private The governing board annually approves an organization-wide budget.

Standard 8.10 • private The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.

Standard 8.11 • private A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.

Standard 8.12 • private The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.

Standard 8.13 • private The organization has a written policy in place for record retention and destruction.

Appendix E

Henry McMaster, *Governor*
Marcia S. Adams, *Executive Director*

OFFICE *of* ECONOMIC OPPORTUNITY
James Miller, Director
1205 Pendleton Street, Suite 349
Columbia, SC 29201
803.734.0662
803.734.0356 Fax

admin
THE SOUTH CAROLINA
DEPARTMENT *of* ADMINISTRATION

Office of Economic Opportunity
Request for Additional Information

Date Request Issued:	7/17/2017	**Date Received:**	
Deadline for Request:	7/24/2017	**Request Issued by:**	Andrew Walsh
Agency:	XYZ CAP Inc.	**Program/Year:**	CSBG/LIHEAP/WAP 2017
Director:		**Reference:**	Desk Review
Preparer		**Period of Review:**	May & June 2017

Requested Information		
	Report Type	**Description**
X	Bank Reconciliation	May & June 2017
X	Bank Statement	May & June 2017
X	Check Register	May & June 2017
	Journal Entries	See Attached list
X	Trial Balance	May & June 2017
	OTHER:	
X		Travel & Vehicle Logs for all OEO Programs for May & June 2017
X		Sample Invoices-See Attached list
X		Current Fixed Asset Inventory Listing

Correspondence (for OEO use only)	
Date	**Comments**

SAMPLE

Sample CAA
Bank Reconciliation
At July 31, 2016

Balance per bank	$ 666,368
Less outstanding checks	(166,105)
Plus outstanding deposits	125
Ending cash balance	$ 500,388
Balance per GL	
CSBG	$ 150,943
LIHEAP	248,300
DOE WAP	25,400
LWAP	75,000
SCE&G Project Share	745
	$ 500,388

South Carolina Office of

ECONOMIC OPPORTUNITY

DEPARTMENT *of* ADMINISTRATION

Protocol for CSBG & LIHEAP Grants:

Policies and procedures for program monitoring to ensure the accomplishment of program outcomes and grant compliance.

OEO Mission and Responsibilities

The mission of the Office of Economic Opportunity (OEO) is to expand awareness of human service programs throughout the State of South Carolina and to implement and maintain technical support for our service agencies in the areas of moving eligible families, including the elderly and disabled, from their current economic condition to stabilized and ultimately self-sufficient.

The OEO shall administer the Community Services Programs in accordance with the State Plans, State and Federal statutes and other policies and interpretations as may be required by appropriate State or Federal authorities. South Carolina Code of Laws (SECTION 58-37-50) dictates that Community Services Block Grant (CSBG), Low-Income Home Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP) be administered locally by Community Action Agencies (CAAs); therefore, subawards are made only to eligible Community Action Agencies. The OEO shall ensure that services and activities implemented to assist low-income persons, including the poor, in areas as set forth in Section 676(b)(1) of the Act/Statute.

The OEO, through Grant Agreements with eligible Subgrantees, will carry out the services and activities necessary to comply with Section 675(c)(1) of the Act. OEO's minimum responsibilities as the state administering agency are:

1. Development of the State Plan and of the CSBG fund distribution process;
2. Establishment of program policies and operational procedures;
3. Development of accounting policies and procedures;
4. Development of fiscal procedures, including required audits;
5. Procedures for record maintenance and for supporting documentation;
6. Issuance of policies and procedures for compliance with Act 143 of 1983, South Carolina Code of Laws, referenced as the "Community Economic Opportunity Act of 1983", as amended;
7. Review and approval of Subgrantee Work Plans;
8. Determination of Subgrantee eligibility;
9. Issuance of grants;
10. Monitoring of the program throughout the state;
11. Training and technical assistance;
12. Evaluation of Subgrantee agency program performance and identification of remedial procedures;
13. Reporting of program data.

Program Overview

Community Services Block Grant (CSBG)

The Community Services Block Grant (CSBG), administered by the states, provides core funding to local agencies to reduce poverty, revitalize low-income communities and to empower low-income families to become self-sufficient. The CSBG is currently authorized under the 1998 CSBG Act.

Agencies in the CSBG network are Community Action Agencies (CAAs), created through the Economic Opportunity Act, a predecessor of the CSBG. Community representation and accountability are hallmarks of the CSBG network, where agencies are governed by a tri-partite board. This board structure consists of elected public officials, representatives of the low-income community, and appointed leaders from the private sector.

CSBG is not required to implement verification requirements, therefore, "Non-citizens, regardless of their alien status, should not be banned from Community Services Block Grant programs" (CSBG IM No. 30, US Department of HHS for Children and Families Office of Community Services Division of State Assistance).

The federal income eligibility According to the CSBG Act, the term "poverty line" means the official poverty line defined by the Office of Management and Budget

based on the most recent data available from the Bureau of the census. The annual revision of the poverty line, shall be used as a criterion of eligibility in the community services block grant program. The State may revise the poverty line not to exceed 125 percent of the official poverty line ((Section 673(1)(B)(2)).

CSBG requires States to use the FPL when determining customer eligibility. However, States are allowed the flexibility to determine the formula in which funds are distributed by county (ex. Historical, FPL only, Historical + Formula, etc.) Reference OEO's Fiscal Policies and Procedures for OEO's methodology to allocate and distribute funds to eligible entities.

CSBG Program Operations: January 1st – December 31st. Federal reports are based on events that occur during the program year.

Low-Income Home Energy Assistance Program (LIHEAP)

The Low-Income Home Energy Assistance Program (LIHEAP), administered by the states, assists low-income households, particularly those with the lowest incomes that pay a high proportion of household income for home energy, primarily in meeting their immediate home energy needs. Grantees (states) must provide crisis assistance. States have the option to provide home heating/cooling, weatherization and/or energy-related minor home repairs.

Congress established the formula for distributing funds based primarily on each State's weather, fuel prices, and low-income population. Home energy is defined as a source of heating or cooling in residential dwellings. Grantees (states) can use funds for heating and/or cooling costs as well as up to 15% of their funding for weatherization assistance.

LIHEAP defines eligible household members as any individual who is a U.S. citizen or "qualified alien". A "qualified alien is defined at 8 U.S.C. § 1641(b). Members of the household must meet the eligibility requirements specified in Section 2605(b)(2) of the Low-Income Home Energy Assistance Act (42 U.S.C. § 8624(b)(2)).

The Federal income eligibility All LIHEAP grantees must set their income-eligibility criteria between 110 percent of these guidelines and the greater of (1) 150 percent of these guidelines; and (2) 60 percent of State Median Income (SMI). Reference the Health and Human Services Poverty Guidelines (HHSPG). HHS will publish LIHEAP's 60 percent of SMI criteria.

LIHEAP allows State's the flexibility in choosing to serve constituents based on the FPL or the State's Median Income (SMI). The State then has the flexibility in determining how funds are distributed to eligible entities. When comparing South Carolina's State Median Income to the Federal Poverty Guidelines (FPG), OEO realized the SMI had an adverse effect disqualifying households with more than six (6) persons that had traditionally been eligible for LIHEAP service. Therefore, South Carolina elected <u>not</u> to use the SMI so as not to penalize our historical customer base. Reference OEO's Fiscal Policies and Procedures for OEO's methodology to allocate and distribute funds to eligible entities.

LIHEAP grantees must adopt these guidelines by the beginning of the Federal Fiscal Year or the beginning of a Grantee's program year, whichever is later.

LIHEAP Program Operations: January 1st – December 31st. While South Carolina operates on a calendar year, Federal reports are based on events that occur during the Federal Fiscal Year (FFY) October 1st – September 30th.

Federal Poverty Guidelines

South Carolina utilizes the Federal Register notice announcing the annual update of the Federal Poverty Guidelines to determine eligibility for CSBG and LIHEAP grants, which mirrors the Health and Human Services Poverty Guidelines (HHSPG). South Carolina's FPG is updated only once annually at the beginning of each calendar year, upon Federal notice. The Federal Register notice is generally issued on or around January 31st. South Carolina will determine eligibility based on the previous year's FPL until receipt of the updated notice. Upon receipt of the updated FPL, it is the responsibility of the

CSBG/LIHEAP Program Manager to issue an Information Memorandum (IM) alerting the CAA network and the statewide database (DBA) when to adopt the new guidelines. Included in the IM should be calculations for CSBG, LIHEAP and Weatherization (WAP) programs according to 100%, 125%, 150% and 200% of the FPL. A copy of the IM should be saved to OEO's CSBG/LIHEAP grant control file.

OEO CSBG/LIHEAP Grant Awards

It is the intent of OEO to maximize program efficiency, ensure the application of appropriate procedures, and maintain the integrity of grant funds.

A timeline of events must occur before awarding CAA's CSBG and/or LIHEAP funds:

- Approved State Plans - US HHS must approve South Carolina's CSBG and LIHEAP State Plans to receive Federal Awards.
- Approved Community Action Plan – OEO must approve CAA's Community Action Plans to administer programs in their designated counties.
- Approved Budget – OEO's fiscal staff must approve CAA's budgets
- Executed Grant Agreements – CAA's must submit signed grant agreements to OEO prior to the release of funds.

OEO CSBG/LIHEAP Program Monitoring

South Carolina is tasked to assess the health of the entire agency through the State's monitoring practices. Such assessments include general oversight, desk reviews, and onsite reviews of the following: agency work plan and/or contract, needs assessments, service delivery systems, administration and management systems, board and governance systems, and financial systems. Monitoring is a way of identifying and correcting problems in program policies and operations. If monitoring is conducted early in the program year, then problems can be corrected to improve current program activities. Also, results from monitoring can be used to help design a more effective program for the next fiscal year.

To assure the accomplishment of program outcomes and grant compliance, the OEO will monitor each Subgrantee a minimum of one time per three program years.

Monitoring will include site visits consisting of the review of client files, year-to-date reporting, year-to-date achievement of outcomes and milestones, Results Oriented Management and Accountability (ROMA) implementation, partnerships/collaboration, Board minutes and Board membership rosters, and the accomplishment of the 58 Organizational Standards. Offsite desk reviews may also be conducted. The Subgrantee will be briefed on the observations and/or findings generated by the monitoring during the exit interview. Additionally, training and technical assistance may be provided during the monitoring visit or upon request.

Types of State Monitoring

OEO will conduct the following types of monitoring of subrecipients.

a) Triennial Onsite Programmatic Monitoring: To assure the accomplishment of program outcomes and grant compliance, the OEO will monitor each Subgrantee a minimum of one time per three program years.

b) Annual Fiscal Monitoring: In its interim and at the discretion of the State, OEO will conduct risk-based monitoring annually of subrecipients to strengthen oversight of Federal awards. The review will include, but may not be limited to, onsite interval monitorings to include a sample of customer files, observation of subrecipient satellite office(s), desktop review of customer files, a review of expenditures and the accuracy of related documentation.

c) Annual Monitoring of Organizational Standards: 42 U.S.C. § 9914 requires State CSBG Lead Agencies to establish "performance

goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. The Center of Excellence (COE) developed 58 standards for nonprofit eligible entities. To ensure the consistent achievement of the 58 Organizational Standards as required by the Office of Community Services (OCS), OEO requires each CSBG eligible entity to upload and maintain all standards in the statewide database for OEO approval. Standards will be monitored annually according to the Calendar of Required Actions.

d) Board Compliance: In order to assure board compliance, eligible entities will provide the OEO, via the statewide database, a current board of director's roster and completed and signed board composition forms. Changes in composition are to be reported to the OEO within thirty (30) days of the change. Additionally, Subgrantees will upload minutes to the statewide database for each board meeting no later than thirty (30) days following the approval of the minutes.

e) New Eligible Entity Monitoring: An onsite review of each newly designated eligible entity will be conducted during the first year in which such entity receives funds.

f) Follow-up monitoring: Follow-up reviews will occur for subrecipients, and their programs that fail to meet the goals, standards and requirements established by the State. If the on-site monitoring reveals serious deficiencies and/or deficiencies are not corrected in a timely manner in accordance with requirements, the State Office will conduct a follow-up on-site monitoring review and provide training and technical assistance as deemed necessary.

g) Additional Monitoring: Other reviews are conducted as appropriate. These might include reviews of subrecipients with programs that have had other Federal, State or local grants terminated for cause. If a subrecipient is experiencing programmatic issues, OEO will conduct additional reviews and ensure that training and technical assistance is provided as deemed necessary.

OEO Monitoring Schedule

OEO managers, auditor(s) and/or legal counsel will meet in December to assesses the risks of each eligible entity. Considering the potential risks of each subgrantee, OEO will draft a monitoring schedule for the upcoming program year. OEO will consider location and season, to avoid costly travel expenses (example: OEO will attempt to schedule overnight monitorings along the coast during the off-season to meet the Federal per diem for lodging costs). The Federal Per Diem Rates can be accessed at https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-lookup. OEO will then provide the dates to each agency's Executive Director for approval. The monitoring schedule will be finalized by January 1st.

The Monitoring Process

Pre-Monitoring Procedures

a) It is the responsibility of the OEO Program Coordinator to compose the **monitoring instruments** and **monitoring exhibits** and submit to OEO's legal counsel to include in the monitoring announcement letter. A template of the monitoring instrument and exhibit can be provided by the CSBG/LIHEAP Program Manager or found on OEO's S: drive.

b) OEO's legal counsel will send the CAA notification of monitoring along with monitoring exhibits at least 30 days prior to monitoring to the Executive Director and designated points of contact.

c) The OEO Program Coordinator will contact the agency's program director or the database help desk and request the total number of customers served by program, one week prior to the

monitoring. The coordinator will then make the appropriate copies of CSBG/LIHEAP monitoring sheets.

d) At minimum, a Program Coordinator should have the following items to monitor: Monitoring sheets; a copy of the monitoring exhibit, announcement letter and instruments; Administrative Guide(s); database pay frequency calculations; FPL(s); current and prior year calendars; CSBG/LIHEAP State Plans; CSBG Act, LIHEAP Statute; copies of the agency's current logic models; a calculator; pens; highlighters; stapler; and agency/OEO contact information.

On-Site Monitoring Procedures

OEO will conduct on-site monitoring as indicated in the Types of Monitoring. A typical visit can be expected to span two (2) to five (5) days on-site. Issues identified onsite could result in a longer monitoring period. Program monitors will travel and review as a team and execute the following:

a) Offer both an entrance and exit conference with the Executive Director and appropriate staff. The lead Program Coordinator will conduct the entrance conference to reinforce the agenda items outlined in the monitoring announcement. An exit conference should be scheduled within 10 days of OEO's completed review. The exit conference may be provided via telephone conference call with the Executive Director and appropriate OEO and agency staff.

b) A sample of CSBG and LIHEAP customer files are randomly selected for review to determine that files document customer eligibility, costs are allowable and traceable to the accounting system, and are in accordance with provisions of cost principles and conditions of the Grant Agreement.

The program manager will determine which program years to review, based on the agency's past performance. Note: Consider monitoring program performance dating back to OEO's latest monitoring to present. This could result in monitoring two program years. The number of files selected is based on agency size, number of CSBG/LIHEAP programs, number of customers served at the time of monitoring, past performance, interval/full site monitoring and the number of OEO program coordinators available.

c) Review Organizational Standards. Organizational Standards categories 1-6 and 9 are monitored and approved by the CSBG manager and program coordinators. Categories 7 and 8 are monitored by OEO's fiscal manager and monitoring staff.

d) Review board Compliance (board composition and roster according to agency by laws) and meeting minutes to verify proper board practices;

e) Review Vendor Agreements and payments;

f) Observation of Fair Hearing and Appeals posting, current CSBG/LIHEAP State Plans and current agency Community Action Plans;

g) Observe the client intake process;

h) Observe and review the collection of reports submitted monthly and quarterly (CSBG Outcome Measures report, LIHEAP Household report);

i) Interview staff, if available;

j) Interview customers, if available;

k) Provide staff T/TA upon request.

Interim Monitoring Procedures

OEO may conduct an on-site interim monitoring visit that could span two (2) days. A team of program monitors will:

a) Offer both an entrance and exit conference;

b) A smaller sample of customer files are randomly selected for review to determine that customer files document customer eligibility, costs are allowable and traceable to the accounting system, and are in accordance with provisions of cost principles and conditions of the Grant Agreement.

c) Review Organizational Standards

d) Review board Compliance (board composition and roster according to agency by laws) and meeting minutes to verify proper board practices;

e) Review of Vendor Agreements and payments;

f) Observation of Fair Hearing and Appeals posting, current CSBG/LIHEAP State Plans and current agency Community Action Plans.

During the **second day of interim monitoring**, program monitors will perform an onsite review of the agency's satellite office to include:

a) Observation of Fair Hearing and Appeals posting, current CSBG/LIHEAP State Plans and current agency Community Action Plans;

b) Observe the client intake process;

c) Observe and review the collection of reports submitted monthly and quarterly (CSBG Outcome Measures report, LIHEAP Household report);

d) Discuss with program manager(s) and staff the implementation of CSBG and LIHEAP projects, including program success and obstacles;

e) Interview customers, if available; and

f) Provide staff T/TA.

Desktop Monitoring Procedures

OEO will use desktop monitoring procedures in the review of eligible entities' annual CSBG Organizational Standards self-assessment, review of Board compliance, and to monitor customer files.

a) Conduct desktop review of programs and customer files during the interim period.

b) Organizational Standards will be reviewed periodically throughout the program year to assure compliance according to the Calendar of Required Actions. Utilizing the statewide database, OEO will review subrecipient's submissions and approve, request additional information or deny the achievement of standards. All standards (according to the Calendar of Required Actions) must be uploaded and achieved by December 31st. Standards unmet will be considered noncompliant and the entity will be required to respond through a Technical Assistance Plan (TAP) which will set a clear timeline and benchmarks for progress. Standards continuously unmet will escalate to a Quality Improvement Plan (QIP).

c) Review Board Compliance (Board composition forms, roster and meeting minutes according to agency by laws).

Post-Monitoring Procedures

OEO will provide timely feedback to subrecipients on the results of each monitoring visit with an opportunity for the monitored entity to respond to all observations and findings. All results of the monitoring will correspond with Federal statute, State policies, grant agreements, vendor contracts, Community Action Plans, etc.

a) An exit conference will be scheduled within ten (10) days of OEO's completed monitoring.
b) Following the exit conference, the CAA has five (5) business days to provide pending information requested by OEO to resolve outstanding monitoring concerns.

c) Following the exit conference, OEO has twenty-five (25) days to issue a draft report to the CAA.
d) From the date of receipt, the CAA has ten (10) days to respond to OEO's draft report.
e) Finally, OEO has twenty (20) days to issue a final report, including the CAA's rebuttals.

Reference OEO's monitoring policies and procedures for further monitoring report instructions.

Monitoring Board Vacancies and Composition

Sections 676B of the Community Services Block Grant Reauthorization Act of 1998 requires that, as a condition of designation, private nonprofit entities and public organizations administer their CSBG program through tripartite boards that "fully participate in the development, planning, implementation, and evaluation of the program to serve low-income communities."

42 U.S.C. § 9910(a)(2): Requires a nonprofit CAA's governing board to be selected by the CAA and the board to be composed to assure that – (A) 1/3 of the board are elected public officials, holding office on the date of selection, or their representatives, except that if elected officials are unavailable and/or unwilling to serve, CAAs may elect appointed public officials to meet the 1/3 requirement; (B) not fewer than 1/3 of the board are chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and (C) the remainder of the board are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

OEO should review CAA bylaws to ensure any vacancy in any sector be filled within 90 days. If vacancies exceed 90 days, the CAA will provide OEO a written plan outlining a timeline to recruit competent, qualified member(s) of the community to fill the vacancy(ies) on the Board of Directors.

Eligible entities should maintain current Board information, to include a roster, composition forms and executed meeting minutes in the statewide database. Changes in composition are to be reported to the OEO within thirty (30) days of the change. Additionally, Subgrantees will upload executed minutes to the statewide database no later than thirty (30) days following the approval of the minutes in DBA.

Monitoring Fair Hearing and Appeals

For the purpose of ensuring the impartial and effective administration of Office of Economic Opportunity (OEO) programs to low-income citizens of South Carolina, Section 2605(b)(13) of the LIHEAP statute (42 U.S.C. § 8624(b)(13)) states that "As part of the annual application required by subsection (a) of this section, the chief executive office of each State shall certify that the State agrees to – … (13) provide an opportunity for a fair administrative hearing to individuals whose claims for assistance under the plan described in subsection (c) of this section are denied or are not acted upon with reasonable promptness; …."

Each agency must educate and inform each applicant of the Appeal and Fair Administrative Hearing Procedures. A copy of these procedures must be posted in a visible place in each office and explained to all applicants for the following OEO federal program areas: CSBG, LIHEAP and WAP. Constituents who assert they have been unfairly treated and/or those who have been denied access to program assistance services are entitled to be notified in writing explaining the reason for the denial.

Subgrantees of the Office of Economic Opportunity funds are encouraged to settle appeals, when possible. However, if resolution cannot be reached within a reasonable time frame, the proper procedures to advance an appeal are as follows:

- Customer's should appeal first to the Community Action Agency in which he/she applied for service(s), requesting a formal hearing.

- If the appeal is denied at the Community Action Agency, a written appeal can be submitted to the Office of Economic Opportunity:

  1205 Pendleton Street, Suite 366
  Columbia, SC 29201
  (803) 734-0662

- If the appeal is further denied by the Office of Economic Opportunity, a petition can be made to an appellate court in the State of South Carolina.

The funds or services in question need to be obligated (set aside) until a final decision is reached. If the applicant is successful, the funds or services will be provided to the applicant. If the applicant is unsuccessful, funds are to be reverted to Client Assistance and made available to eligible participants.

State's Obligations When It Finds a Deficiency

The federal CSBG Act requires states to inform a CAA of a deficiency and give the CAA an opportunity to correct the deficiency. OCS recommends that a state office document the basis for a performance deficiency or failure to comply with a state requirement and maintain records of correspondence or other communication relating to actions taken. OCS also recommends that a state CSBG office maintain records of correspondence or other communications related to an enforcement action against a CAA to establish compliance with the federal CSBG Act. All correspondence will be saved to the entities OEO file located on the S: drive. It is the responsibility of the program coordinator to communicate concerns and/or deficiencies to the program manager. The program manager will then communicate all concerns/deficiencies to OEO's Executive Director and other relevant OEO Managers if necessary.

Training and Technical Assistance

Effective monitoring includes providing training and technical assistance. The federal CSBG Act requires that, in many or most instances, a state office take two steps to assist a CAA in correcting a deficiency: provide training and technical assistance (T/TA) and allow the CAA to submit a Quality Improvement Plan (QIP) (also referred to as a Corrective Action Plan (CAP)).

OEO will provide training and technical assistance upon request and when deemed necessary. OEO may provide this assistance directly, through the State Association, a peer CAA, a local or national TA provider, and/or any other mechanism that is deemed appropriate.

T/TA should focus on the CAA's specific deficiencies or the issues underlying them. All trainings will include an agenda, sign-in sheet and supporting documentation to be filed at OEO.

Situations where OCS Views T/TA as NOT Appropriate

OCS gives the following examples of when T/TA may not be appropriate:

• A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance;

• A deficiency for which the state has previously provided technical assistance and the eligible entity has failed to institute corrective actions;

• Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance; or

• A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing.

Reference https://www.acf.hhs.gov/ocs/resource/no-116-corrective-action-termination-or-reduction-of-funding.

Quality Improvement Plan (QIP)

It is within the State's discretion whether to give a CAA the opportunity to develop and implement a Quality Improvement Plan to correct a deficiency. However,

the state's discretion to deny a CAA the opportunity to submit a Quality Improvement Plan is generally limited to situations where the seriousness of the deficiency and the time required to correct it would make a QIP invalid.

A CAA's QIP must be able to correct a deficiency within a reasonable time as determined by the OEO. If the state office grants a CAA the opportunity to submit a QIP, it must give the CAA 60 days after it informs the CAA of the deficiency to develop and implement the QIP, and up to 30 days to develop and implement a QIP for immediate deficiencies. The state CSBG office must notify a CAA of its decision to approve or not approve the QIP within 30 days of receiving it from the CAA. If OEO does not approve the QIP submitted by the CAA, OEO must also specify the reason(s) why when it notifies the CAA of its decision. The state CSBG office must also report eligible entities on QIPs to OCS within 30 days.

Situations when a State Office is NOT Required to Grant the Opportunity to Submit it a Quality Improvement Plan

A State office may consider denying a CAA the opportunity to prepare a QIP if:

• A deficiency for which a CAA has previously instituted a corrective action and has repeated findings and

• A deficiency that involves evidence of fraudulent reporting or use of funds or other evidence of criminal wrongdoing and, therefore, presents a risk requiring immediate action.

OEO allows CAAs the discretion to develop a QIP that best addresses their situation. As soon as a CAA submits a QIP to the state office it should assume that the QIP will be approved and begin preparing for implementation of the QIP. By doing so, if the QIP is approved, the CAA will ensure that it can begin implementing the QIP well within the required 60-day period.

OEO must evaluate the risks posed by the Subgrantee. If OEO determines the Subgrantee poses a risk, OEO may impose additional specific conditions that correspond to the degree of risk assessed.

A. Special conditions and/or restrictions may be imposed when the Grantee determines that the Subgrantee:

1. Is not financially stable;

2. Has a management system and ability that does not meet the management standards set forth by the Grantee;

3. Has a documented history of unsatisfactory performance;

4. Has not complied with the general or specific terms, conditions, covenants and stipulations of previous grant awards; OR

5. Is otherwise not responsible.

Reference 42 U.S.C. §§ 9915(a) and (b); 45 C.F.R. §§75.205 and 75.207(a).

B. Special conditions and/or restrictions Grantee may impose include, but are not limited to the following:

1. Require Subgrantee to develop and implement a quality improvement plan to correct the deficiency within a reasonable period, after approval by the Grantee;

2. If Grantee determines training and technical assistance is appropriate, require Subgrantee to obtain training and technical assistance to correct the deficiency;

3. Payment to the Subgrantee on a reimbursement basis;

4. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given funding period;

5. Requiring additional detailed financial reports and/or data;

6. Additional project monitoring and interim audits;

7. Requiring the Subgrantee to obtain technical and/or management assistance;

8. Establishment of additional prior approvals;

9. Establishment of additional constraints as necessary and appropriate in the circumstances; AND/OR

10. Require Board acknowledgement of agency's status.

Reference 42 U.S.C. §§ 9915(a)(2) - (a)(4); 45 C.F.R. §§75.207(b).

C. If Grantee decides to impose such special conditions and/or restrictions, Grantee will notify the Subgrantee as early as possible, of the following:

1. The nature of and reason for the special conditions and/or restrictions;

2. The corrective actions which must be approved by Grantee and completed by the Subgrantee prior to the removal of the special conditions and/or restrictions;

3. The time allowed for completing the corrective actions, if applicable;

4. The method of appeal for reconsideration of the imposed conditions/restrictions; and

5. The training and technical assistance Grantee is offering to the Subgrantee, if appropriate, to help correct the deficiency. If training and technical assistance are not appropriate, Grantee will include an explanation detailing the reason(s).

Reference 42 U.S.C. §9915(a)(1) and 45 C.F.R. §75.207(c).

D. Grantee will remove any special condition(s) and/or restriction(s) once the condition(s) prompting them have been corrected. See 45 C.F.R. §75.207(d).

Remedies for Noncompliance

If a Subgrantee fails to comply with Federal and/or State statutes, regulations or the terms and conditions of a Federal Award, Grantee may impose additional conditions, as described in the subrecipient grant agreement. If Grantee determines that noncompliance cannot be remedied by imposing additional conditions, Grantee may take one or more of the following actions, as appropriate in the circumstances:

a) Temporarily withhold cash payments pending correction of the deficiency by the Subgrantee;

b) Disallow all or part of the cost of the activity or action not in compliance;

c) Wholly or partly suspend or terminate the grant;

d) Provide adequate notice and an opportunity for a hearing;

e) Initiate suspension, debarment or termination of the grant;

f) Withhold further grant funds for the project or program; and/or

g) Take other remedies that may be legally available.

Also reference 42 U.S.C. §9915(a)(5) and 45 C.F.R. §75.371.

Administrative Enforcement

The enforcement remedies identified in the agreement do not preclude the Subgrantee from being subject to "Debarment and Suspension" as prescribed by the Grantee. When a Subgrantee fails to comply with the terms of this Agreement, as outlined in

Corrective Action and Suspension of Funding and/or grant requirements/reports are not submitted within the required time frame, nor completed in accordance with the generally accepted principles, nor consistent with the approved budget, Community Action Plan (also referred to as agency work plan) or Grant Agreement; a temporary suspension of funding for enforcement purposes may be instituted, but shall not constitute a statutory termination or reduction of funding as prescribed by 42 U.S.C. §9915.

A. **Effects of Suspension (45 C.F.R. §75.375)**
Costs incurred by the Subgrantee during a suspension or after termination of the Grant are not allowable unless the Grantee expressly authorizes such in the Notice of Suspension or Termination. Other Subgrantee costs during suspension or termination, which are necessary and not reasonably avoidable, are allowable if:

1. The costs result from obligations which were properly incurred by the Subgrantee before the effective date of the suspension or termination are non-cancelable; and
2. The costs would be allowable if the Grant was not suspended or expired normally at the end of the funding period in which the termination takes effect and the Subgrantee has written permission from the Grantee to incur such costs.

B. **Relationship to Debarment and Suspension**
If the Grant exceeds $25,000 or if the Subgrantee has critical influence on or substantive control over the transaction completion of the Grant, completion of the Debarment Certification, which is included in the Grant Agreement, is required. The Subgrantee is responsible for completing the Debarment Certification, monitoring the submission and maintaining the official document.

Defunding and Termination

A state office must initiate proceedings to terminate or reduce funding if a CAA fails to correct a deficiency. However, the state may do so only after it has met the following responsibilities:

• Adequate notice and
• An opportunity for a hearing on the record.

It is within OEO's discretion to determine the format of the notice and hearing it will provide a CAA. Any notice and hearing provided should be consistent with applicable state policies, rules or statutory requirements, including the state's administrative procedures act (APA). The notice and hearing procedures should also be made available to the CAA.

After giving notice and conducting a hearing, if OEO finds cause to reduce or terminate funding, the state office must initiate proceedings to do so unless the CAA corrects the deficiency.

"Cause" to Reduce or Terminate Funding

Following the hearing, OEO determines if "cause" exists to reduce or terminate a CAA's CSBG or other OEO awarded funding. The federal CSBG Act explains that "cause" for which a state office may initiate a reduction in or termination of a CAA's funding includes:

The failure of a CAA to comply with the terms of its CSBG agreement with the state, the state plan or to meet a state requirement.

If the state finds "cause" exists and the CAA disagrees with the state's finding, the CAA should request a review by HHS of the state's finding.

A state office may also initiate a reduction in funding for "cause" if a statewide redistribution of CSBG/LIHEAP funds is needed to respond to one of the following:

- The results of the most recently available census or other appropriate data,
- The designation of a new CAA, or
- Severe economic dislocation.

Termination

Any eligible entity which received funding in the previous fiscal year under the Act will not have its present or future funding terminated or reduced below the proportional share of funding it received in the previous year, unless after notice and an opportunity for hearing on the record, Grantee determines that cause existed for such termination or reduction subject to the procedures and review by the Secretary as provided in 42 U.S.C. §9915.

Termination is defined as the permanent withdrawal of funding by the state administering authority of an eligible entity's authority to obligate previously awarded funds before that authority would otherwise expire, or the refusal of the state to continue funding to the eligible entity. A temporary suspension of funding for administrative enforcement purposes shall not constitute a statutory termination or reduction of funding.

Termination of the Grant Agreement may be initiated by the Grantee, the Subgrantee, or by mutual agreement of both parties as prescribed herein. The following shall apply to the termination of this Grant:

A. Termination for Lack of Funds

The parties hereto covenant and agree that their liabilities and responsibilities, one to another, shall be contingent upon the availability of funds, Federal or State, for the funding of CSBG activities. This Grant shall be terminated if such funding ceases to be available. The Grantee shall have the sole authority for determining the lack of availability of such funds. The Grantee shall immediately notify the Subgrantee of any cutback in funds of which it becomes aware.

B. Termination for Breach of Grant

This Grant may be suspended or terminated by the Grantee at any time within the Grant period whenever it is determined by the Grantee that the Subgrantee has breached or otherwise failed to comply with its obligations.

C. Termination for Breach of Previous Contracts and Grants or Non-Payment of Previous Audit Disallowances

This Grant may be suspended or terminated by the Grantee at any time within the Grant period if the Subgrantee has failed to make payment in full to the Grantee for audit disallowances pursuant to any previous Contract or Grant Agreement between the parties or the Subgrantee has failed to comply with the maintenance and inspection of records requirements of any previous Contract or Grant between the parties.

D. Termination by Subgrantee

The Subgrantee may terminate this Grant by giving the Grantee 30 day's written notice of intent to do so. Expenditures legitimately incurred by the Subgrantee prior to the date of termination of this Grant will be permitted providing they are in accordance with provisions of this Grant.

E. Termination for Convenience

The Grantee and Subgrantee may mutually agree to terminate the Grant in whole or in part. In which case, the two parties shall agree upon the termination conditions, the effective date and in the case of partial termination, the portion to be terminated.

F. Termination for Insolvency

This Grant is subject to immediate termination by the Grantee upon the Subgrantee's insolvency, including the filing of proceedings in bankruptcy.

G. Notice of Termination

In the event of Grant termination, except Termination for Insolvency in F above, the party terminating the Grant shall give notice of such termination in writing to the other party. Notice of Termination shall be sent by certified mail, return receipt requested, and shall be effective 30 days after the date of the receipt, unless otherwise provided by law; provided however, if terminated pursuant to paragraph A, said termination shall be effective upon receipt of such notice.

H. Process for Termination

If Grantee believes cause for funding termination exists, the following steps shall be followed:

1. If Subgrantee fails to correct all deficiencies identified during a corrective action plan or if based on the seriousness of any of the deficiencies, the Grantee determines Termination is appropriate, a certified letter will be sent from the Grantee's Director to the Subgrantee's Board Chairperson advising him/her of Grantee's recommendation to

terminate the grant, along with the reasons for this recommendation. Within fifteen (15) days of receipt of this recommendation, Subgrantee may request a hearing in writing to appeal this recommendation.

2. If Subgrantee appeals Grantee's recommendation, the Department of Administration's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within thirty (30) days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act. All proceedings will be recorded.

3. A Federal review of the Grantee's decision to reduce or terminate funding may be initiated through a request from Subgrantee. In accordance with 45 CFR §96.92, Subgrantee has 30 days following notification by Grantee of its final decision to request a review by the Secretary of the Department of Health and Human Services (HHS).

The US DHHS Secretary will either accept or deny this request.

1. If the request for review is denied, defunding procedures will begin immediately and will be concluded not more than ninety (90) days following the date of the hearing.

2. If the request for review is granted, the Secretary will review the hearing officer's determination not later than ninety (90) days after receiving from the State all necessary documentation relating to the determination.

    a. If the Secretary upholds Grantee's determination, defunding procedures will begin immediately;

    b. If the determination is overturned by the Secretary, the grant relationships with the subject agency will be continued; and

    c. If the review is not completed within ninety (90) days, the determination of Grantee will become final on the 91st day and defunding procedures will begin as outlined

I. Appeal of Termination by Subgrantee

If a Subgrantee fails to comply with the Terms and Conditions of this Grant or to remedy a situation under

suspension, the State may terminate the Grant in whole or in part at any time.

The CSBG Act requires that any community action agency which received funding in the previous program year will not have present or future funding reduced or terminated unless after notice, and opportunity for a hearing on the record, the State determines that cause exists for such reduction or termination subject to the procedures and review by the Secretary. To comply with this assurance the Grantee shall set forth the following:

1. This section is not applicable to Section IX, Items A, D, and E which result in terminations by law, Subgrantee choice or convenience for a mutually agreed upon provision.

2. This section is not applicable to Section IX which results in temporary suspensions of funding for enforcement purposes.

3. This section is applicable to Section IX, Items B, C, and F which will result in terminations for cause as a "final" action.

In the event funding termination occurs, Grantee shall either extend the geographic service area of an eligible entity or submit a Request for Proposal and bid for a new eligible entity. This will be done, as necessary, to provide services to the eligible individuals in that service area and shall be administered in accordance with existing Federal and State legislation.

OEO Designation Procedures

South Carolina Code of Laws (SECTION 58-37-50) dictates that CSBG and LIHEAP be administered locally by Community Action Agencies; therefore, subawards are made only to eligible Community Action Agencies.

Designation/Re-Designation of (New) Eligible Entities

The OEO may designate a new eligible entity if an area of the state is not served or ceases to be served by an eligible entity. This includes situations where an existing eligible entity goes out of business, is terminated, or relinquishes its designation as an eligible entity. OCS IM 116 clarifies that, where a state has decided to terminate an eligible entity's CSBG funding and the entity has appealed that decision to OCS the state can solicit applications for new eligible entities but cannot award funds to a new entity until OCS confirms the state's decision to terminate or the review period ends.

Designation/Re-Designation of Eligible Entities in Unserved Areas

The existing CAAs in South Carolina are eligible entities which receive CSBG and LIHEAP funding to carry out programs and activities designed to appreciably impact the causes of poverty in their designated service areas. If a county has not been, or ceases to be served by an existing CAA under the CSBG and/or LIHEAP, the state may at any time initiate a process for the designation of a CAA or other eligible entity pursuant to provisions of applicable federal and state law, including the CSBG Act, 42 U.S.C. §9901 *et seq.*

The procedure for designation shall be as follows:

1. The State will notify in writing and request written applications from:

   (a) Any private nonprofit organization that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of the CSBG Act, 42 U.S.C. §9901 *et seq.*; and

   (b) Any private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

2. Requirement. To serve as the area's designated eligible entity, an entity shall agree to administer their CSBG program through a tripartite board and add additional members to the board of the entity to ensure adequate representation as outlined in the Section 676B of the CSBG Act and in accordance with Information Memorandum No. 82:
   (a) In each of the three required categories described in the CSBG Act, 42 U.S.C. §9901 *et seq*. by members who reside in the community comprised by the unserved area; and
   (b) In the category relating to low income individuals by members that reside in the neighborhood to be served.

3. Special Consideration. The designation shall be granted to an organization of demonstrated effectiveness in meeting the goals and purposes of both the CSBG and LIHEAP. Priority may be given to eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community needs assessment.

State Plans

CSBG State Plan (Subgrantee Community Action Plans submitted to OEO; OEO submission to HHS)

According to section 676(b) of the CSBG Act, States, including Territories, must prepare and apply and State plan for CSBG funding. The Office of Community Services (OCS) funds CSBG grantees based on the determination that their application and State plans are complete in accordance with all requirements of the CSBG Act. The State CSBG application and plan not only is a critical document for Federal monitoring and oversight purposes, but also provides a framework for accountability and oversight at the State level.

CSBG applications for the Federal Fiscal Year are due to OCS by September 1. States have the option of submitting CSBG applications annually or bi-annually (covering one or two fiscal years); however, South Carolina submits its CSBG Model State Plan annually. The CSBG State Plan is submitted electronically through the Online Data Collection System (OLDC). OEO's CSBG Program Manager submits South Carolina's CSBG State Plan.

State instructions to complete the CSBG State Plan can be found on the Office of Community Services website https://www.acf.hhs.gov/ocs/resource/. Contact South Carolina's Federal CSBG Program Specialist for access to OLDC or visit the following link: https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1.

Similarly, OEO requires its subgrantee's to apply (Community Action Plan) for CSBG funding. OEO's Program Manager provides a checklist of documents to be included in the Community Action Plan to CAA's during the month of June. The CAA's Community Action Plan is a critical document for State monitoring and oversight purposes, but also provides a framework for accountability and oversight at the Subgrantee level. Subgrantee's must submit their plans via the statewide database annually, and no later than the final Friday in the month of August. OEO's Program Manager and Coordinators will review and approve subgrantee Community Action Plans no later than December 1st.

LIHEAP State Plan (Subgrantee Community Action Plans submitted to OEO; OEO submission to HHS)

States, the District of Columbia, territories, and tribes/tribal organizations that wish to administer the Low-Income Home Energy Assistance Program (LIHEAP) must apply for funds each year. Section 2605(c)(3) of the Omnibus Budget Reconciliation Act of 1981, as amended, provides that the Secretary shall make available a model LIHEAP Plan which may be used to prepare the application required under Sections 2605(a)(1) and (c)(1). All applications must be submitted through the On-Line Data Collection (OLDC) system by September 1. OEO's LIHEAP Program Manager submits South Carolina's LIHEAP State Plan each year.

LIHEAP grant applications (State Plans) must include a report on LIHEAP households for the previous Federal Fiscal Year. Because South Carolina operates its LIHEAP program based on the calendar year instead of the Federal Fiscal Year, OEO submits an estimated LIHEAP Household Report with the submission of the State Plan (September 1st) and updates its final Household report to be submitted by December 15th. The final LIHEAP Household report is updated and resubmitted by the LIHEAP Program Manager via OLDC.

State instructions to complete the LIHEAP State Plan can be found on the Office of Community Services website https://www.acf.hhs.gov/ocs/resource/. Contact South Carolina's Federal Energy Assistance Program Specialist for access to OLDC or visit the following link: https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1.

Similarly, OEO requires its subgrantee's to apply (Community Action Plan) for LIHEAP funding. The CAA's Community Action Plan is a critical document for State monitoring and oversight purposes, but also provides a framework for accountability and oversight at the Subgrantee level. Subgrantee's must submit their plans via the statewide database annually, and no later than the final Friday in the month of August.

Distribution of State Plans

Section 676(a)(2)(B) of the CSBG Act conditions the State, in conjunction with the development of the State plan, to hold at least one hearing the in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant.

Meaningful and Timely Participation

A draft of the State Plan is issued to all eligible entities during the month of May to allow time to review and

provide edits and comments. OEO's CSBG program staff will traditionally host a statewide two-day workshop during the month of June to provide an overview of updates and allow for additional input prior to the submission of the State Plans. A draft of both CSBG and LIHEAP State Plans is also posted on OEO's website for public comment and review, as well as disseminated to vendors, stakeholders and board members for additional evaluation.

Legislative & Public Hearings

To be eligible to receive a grant, the State shall hold at least one legislative hearing every three (3) years in conjunction with the development of the state plan (CSBG Act Section 676(a)(3)). In the interim, the State is required to hold at least one Public Hearing to provide to the public an opportunity to comment. A combined hearing for both CSBG and LIHEAP grants are scheduled at the beginning of August.

OEO's Director will contact the Clerk of the Senate to assemble a subcommittee to be present at the scheduled Legislative Hearings, only. A copy of the draft State Plans should be provided to the subcommittee members in a timely manner for review prior to the hearing.

Hearings require all attendants to sign-in and should be recorded to ensure a transcript can be provided with the submission of the plan(s). Any comments provided should be notated. A transcript and sign-in sheet outlining attendants should be uploaded to OLDC with the submission of the State Plan(s).

Advertising Hearings

Public Notice of hearings should be advertised in a manner that provides statewide distribution. OEO's CSBG/LIHEAP Manager will draft a copy of the Public Notice to be advertised in The State newspaper at least three days preceding the date of the hearing. OEO's Director and other appropriate staff will review the Public Notice for final approval. OEO's Business Manager is responsible for providing the Public Notice to The State newspaper to be advertised. A copy of the advertisement should be uploaded to OLDC with the submission the State Plan(s).

Community Needs Assessment

As a condition to receipt CSBG funding, the State will secure from each eligible entity a community action plan that includes a community-needs assessment for the community served (reference CSBG Act Section 676(b)(11)). OEO requires a comprehensive Community Needs Assessment be completed at least once every three years. An updated needs assessment may be provided, as needed, during the interim years.

Budget Process

This section serves to describe the grant budgeting process, particularly as it relates to the CSBG and LIHEAP.

The OEO fiscal manager develops a projected budget based on information, including but not limited to, previous federal awards and any unused funds at the end of the program year. The projected budget generally becomes the amount OEO requests from the federal funding source for the new grant period. This projected budget amount is a starting point for the Subgrantees to use in developing their proposed spending for the new grant period. No spending shall take place until OEO receives the actual federal award notification from the federal funding source. OEO determines the amount of each Subgrantee's actual award. OEO considers South Carolina's total allocation, the poor population by county and the subgrantee's historical funding awards. Once the Subgrantee is notified of the actual award amount, the Subgrantee must make the appropriate adjustments to their initial projected budget and submit the revised budget to OEO for approval.

Budget Approval

A Subgrantee's Board of Directors must review the grant application and actual budget for each program year. The actual budget will be based on the actual award from the funding source and may include prior program year unexpended funds. A completed Community Action Agency Budget Approval Form must be submitted to OEO's fiscal department for documentation of the budget review and approval.

The acknowledgement of the budget review will represent the total allocation of all awards budgeted, note specific approval of salary/wage increases, new positions, as well as procurements that require approval. The budget package submitted to OEO for approval must include all documents to support compliance with procedural requirements. The budget package must be submitted through DBA. This on-line budget submission process requires an authorized user with signature authority.

OEO's CSBG/LIHEAP Senior Manager will review subgrantee budgets, as provided by the OEO fiscal manager/staff. The CSBG/LIHEAP Senior Manager and Program Coordinators will review the Budget Narrative forms to ensure programmatic consistency, compliance and allowances as outlined in the subgrantee's Community Action Plan (logic models). The CSBG/LIHEAP Senior Manager/Program Coordinators will alert the Fiscal Manager and staff of any discrepancies or provide written approval.

CSBG State and Federal Reporting

All Subgrantee reports must be submitted in a timely manner. Timeliness of reporting will be reported on the Subgrantee Risk Assessment.

CSBG Annual Report (Subgrantee reports to OEO; OEO reports to HHS)

Eligible entities will comply with accurate completion and timely submission of the CSBG Annual Report administered by the National Association for State Community Services Programs (NASCSP) and supported by the U.S. Department of Health & Human Services (DHHS), Office of Community Services (OCS), and is a requirement for all eligible entities in receiving CSBG funding.

OCS provides general guidance on the submission of annual reports each year through an Information Memorandum, along with deadlines. The full CSBG Annual Report will be submitted through the Online Data Collection (OLDC) site operated by the ACF Grants Center of Excellence Grant Solutions system. The CSBG Annual Report is generally due to OCS no later than March 31st and is submitted by OEO's CSBG Program Manager. Visit the following link for instructions to gain access to the OLDC reporting system: https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1

OEO requires subgrantee's to submit their individual agency reports via email to OEO's LIHEAP program manager no later than February 15th. OEO's CSBG program manager will enter the State and eligible entities' reports in OLDC to complete the State's submission to HHS. The CSBG program manager will also provide OEO's fiscal manager with the fiscal related sections to be completed. Subgrantee's can access the electronic version of the annual report through the National Association for State Community Services Programs (NASCSP) or at https://nascsp.org/csbg/csbg-data-collection-and-reporting/csbg-annual-report/.

Statewide Workshops: During the month of January, OEO's CSBG program staff traditionally hosts a statewide two-day workshop with Subgrantees to review the annual report instructions and requirements.

Within 60 days of the Grantee's submission of the Annual Report, States are required to communicate each subgrantee's annual performance. OEO's CSBG Program Manager and Program Coordinators provide annually, each agency's actual results. The report compares the actual success rate for services completed during the program year to the agency's projected target goals. Subgrantees should use the report as information to make changes in program forecasts for the upcoming program year and as a guide to monitor program performance.

Organizational Standards (Subgrantee reports to OEO; OEO reports to HHS)

42 U.S.C. § 9914 requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the state's eligible entities. The Center of Excellence (COE) developed 58 standards for nonprofit eligible entities.

To ensure the consistent achievement of the 58 Organizational Standards as required by OCS, OEO requires each CSBG eligible entity to upload and maintain all standards to DBA for OEO approval. Organizational Standards categories 1-6 and 9 are monitored and approved by the CSBG manager and program coordinators. Categories 7 and 8 are monitored by OEO's fiscal manager and monitoring staff.

Prior to monitoring, the State encourages each eligible entity to track their progress using the self-assessment tool and Calendar of Required Actions. Utilizing our statewide database, South Carolina has developed an approval system that allows agencies the ability to upload and submit documentation throughout the year, as each standard is accomplished. The state office will then review submissions and classify each standard as Approved, Rejected, or Requires additional information. Each agency will have the opportunity to provide the State a projected timeline of completion for any outstanding standards. OEO will assess pending items according to the approved schedule of achievement. Organizational Standards will also be reviewed as part of each subgrantee as program monitoring. All subgrantees must comply by the close of South Carolinas Program Year (December 31st). Any agency failing to meet the required deadlines will be issued a Technical Assistance Plan (TAP) outlining a time frame to meet pending standards.

The annual achievement of statewide standards by eligible entity is reported to HHS via OLDC as part of the CSBG Annual Report (due by March 31st) submitted by OEO's CSBG Program Manager. An overview of all Organizational Standards, the Calendar of Required Actions and other related resources can be found on NASCSP's website: https://nascsp.org/csbg/csbg-resources/performance-management/organizational-standards/.

CSBG Outcome Measures Report (Quarterly Subgrantee reports to OEO)

Each quarter, eligible entities must submit a CSBG Outcome Measures report to OEO that describes the National Performance Indicators (NPIs) established by ROMA, Performance Domains, services provided to CSBG clients/ communities assisted, and the results achieved. Individual agency reports must be submitted electronically via email to their assigned OEO program coordinator no later than the 15th day following each quarter. A final report of customers served by program will be submitted via the completed ROMA logic Model (column 5 - Actual Results). All logic models should be completed by the Subgrantee and e-mailed to the appropriate OEO Program Coordinator no later than January 15th following the completion of the program year. Outcome Measures reports will be distributed by OEO. Logic Models can be found on the NASCSP website: https://nascsp.org/wp-content/uploads/2018/02/NPtP-Logic-Model.pdf.

Program Expenditure Notice (OEO report to Subgrantee)

Each quarter, the Program Manager will review the submission of the most current FSR to track CSBG and LIHEAP program expenditures. A Notice of Program Expenditures will be sent on behalf of the Program Manager (or designated Program Coordinators) to each Subgrantee's Executive Director, Program and Fiscal Director if it expenditures are under or over expended. A plan to expend funds will be requested to ensure the agency is on target to spend program dollars in accordance with the grant agreements.

LIHEAP State and Federal Reporting

All Subgrantee reports must be submitted in a timely manner. Timeliness of reporting will be reported on the Subgrantee Risk Assessment.

LIHEAP Household Report Long Form (Subgrantee reports to OEO; OEO report to HHS)

Under the amendments to the LIHEAP statute enacted in 1994 (Public Law 103-252), LIHEAP grant applications must include a report on LIHEAP households for the previous Federal Fiscal Year. OCS requires all LIHEAP grantees (States and Tribes) to report LIHEAP household data. State instructions to complete the LIHEAP Household report can be found on the Office of Community Services website https://www.acf.hhs.gov/ocs/resource/.
The State's submission of the LIHEAP Household Report (reported by Federal Fiscal Year (October 1 – September 30) is due to the Administration of Children and Families' via the On-Line Data Collection (OLDC) System no later than December 15th. OEO's LIHEAP Program Manager submits South Carolina's LIHEAP Household Report each year. Visit the following link for instructions to gain access to the OLDC reporting system:
https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1.

Likewise, OEO requires all LIHEAP eligible entities to report LIHEAP household data monthly that includes the number and income levels of households assisted each month. The statewide LIHEAP Household report can be accessed via the statewide database. LIHEAP Household reports are due to OEO's Program Coordinator(s) on the 15th day following each month.

LIHEAP Performance Measures (OEO report to HHS)

The LIHEAP Performance Data Form is an annual report in response to **Section 2610(b) of the LIHEAP statute (42 U.S.C. § 8629(b))** which requires the Secretary of the U.S. Department of Health and Human Services (HHS) to submit a report to Congress on LIHEAP for the prior Federal Fiscal Year. The LIHEAP Performance Data Form consists of three modules:

- **Module 1 (Grantee Survey)** *Further instructions below.*
- **Module 2 (Performance Measures)**
- **Module 3 (Optional Performance Measures)**

State instructions to complete the LIHEAP Performance Measures report can be found on the Office of Community Services website: https://liheappm.acf.hhs.gov/. The LIHEAP Performance Data Form can be accessed through ACF's web-based system, OLDC https://home.grantsolutions.gov/home/. Visit the following link for instructions to gain access to the OLDC reporting system:
https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1

The State's submission of the LIHEAP Performance Measures (reported by Federal Fiscal Year (October 1 – September 30) is due to the Administration of Children and Families' via the On-Line Data Collection (OLDC) System no later than January 30th. OEO's LIHEAP Program Manager submits South Carolina's LIHEAP Performance Measure report each year.

To complete the performance measures, South Carolina developed a client waiver statement (outlined in OEO's statewide Vendor Agreement and client application) that allows OEO to collect customer's annual usage information from vendors. OEO partners with the state's largest two utility vendors (SCE&G and Duke) to provide data on households as outlined in the report. In conjunction with the Department of Administration's IT department, OEO's LIHEAP Program Manager provides vendors with customer information to be completed. IT ensures all personal identifiable information (PII) is properly safeguarded through digital transfer.

OEO's statewide database (help desk) is also utilized to provide additional LIHEAP data.

LIHEAP Grantee Survey (OEO report to HHS)

The LIHEAP Grantee Survey is part of the LIHEAP Performance Data Form. State instructions to complete the LIHEAP Grantee Survey can be found on the Office of Community Services website https://liheappm.acf.hhs.gov/. The Grantee Survey can be accessed via the LIHEAP Performance Data Form in OLDC https://home.grantsolutions.gov/home/. Visit the

following link for instructions to gain access to the OLDC reporting system: https://www.grantsolutions.gov/gs/registration.gs?execution=e1s1

The State's submission of the LIHEAP Performance Measures (reported by Federal Fiscal Year (October 1 – September 30) is due to the Administration of Children and Families' via the On-Line Data Collection (OLDC) System no later than January 30th. OEO's LIHEAP Program Manager submits South Carolina's LIHEAP Performance Measures Report which includes the Grantee Survey.

The Grantee Survey cross references the LIHEAP Household Report and the Carry Over and Reallotment report. Therefore, it will require information from OEO's Fiscal and Weatherization Managers. The appropriate Federal Poverty Guidelines will also need to be referenced to complete this report. The LIHEAP program manager will disseminate the appropriate forms to relevant staff in December (or as soon as the report becomes available) to be completed.

Program Expenditure Notice (OEO report to Subgrantee)

Each quarter, the Program Manager will review the submission of the most current FSR to track CSBG and LIHEAP program expenditures. A Notice of Program Expenditures will be sent on behalf of the Program Manager (or designated Program Coordinators) to each Subgrantee's Executive Director, Program and Fiscal Director if it expenditures are under or over expended. A plan to expend funds will be requested to ensure the agency is on target to spend program dollars in accordance with the grant agreements.

CSBG and LIHEAP Administrative Guide

The CSBG and LIHEAP Administrative Guide is a manual that serves as a guide to assist CAA's in their day-to-day administration of the grants. The manual contains instructions for determining eligibility and provides program procedures to ensure compliance.

It is the responsibility of the CSB/LIHEAP Program Manger to update annually OEO's Administrative Guide for CSBG and LIHEAP grants. A draft of the Administrative Guide is distributed in November to the CAA Network for comments and edits. A final guide is distributed to the network no later than January1st.

Results Oriented Management and Accountability (ROMA) Database

42 U.S.C. § 9908(b)(12), 9917(a)(1)(A): The federal CSBG Act requires states and CAAs to participate in a performance measurement system such as ROMA to measure the CAA's performance in promoting self-sufficiency, family stability, and community revitalization. State ROMA requirements set forth that a CAA shall maintain back-up documentation to support the total number of families and individuals reported and that such information should be reported on a quarterly basis. Quarterly CSBG Outcome Measures reports are due to OEO on the 15th day following each quarter. All reports must be reported in a timely manner.

LIHEAP Performance Measure Database

42 U.S.C. §2610(a): The federal LIHEAP Statute requires states and CAAs to participate in a performance measurement system to collect the following data:

(1) Information concerning home energy consumption;
(2) the amount, cost and type of fuels used for households eligible for assistance for this title;
(3) the type of fuel used by various income groups;
(4) the number and income levels of households assisted by this title;
(5) the number of households which received such assistance and include one or more individuals who are 60 years or older or disabled or include young children; and
(6) any other information which the Secretary determines to be reasonably necessary to carry out the provision of this title.

OEO Statewide Reporting Database

To comply with Federal data collection requirements set forth by CSBG and LIHEAP, OEO contracts with DBA Technologies (DBA FACSPro) to collect and track subgrantee performance. The South Carolina Department of Administration requires the database be procured every five (5) years.

DBA provides a Help Desk unique to South Carolina OEO and CAA's. Roscoe Mines is the point of contact and will assist all OEO departments and subgrantee's with the collection and reporting of data. The Help Desk also provides trainings as needed and accompanies OEO to on-site monitorings.

The OEO Program Manager will ensure all Program Coordinators have access to DBA at the time of hire.

OEO Travel

OEO will pay for/reimburse staff for transportation and travel-related expenses incurred in connection with monitoring and trainings that have been approved by OEO's Executive Director. Lodging and meals will be reimbursed for overnight out-of-town travel, only. Daily commutes are not reimbursable. Mileage and fuel is not reimbursable when traveling in one's personal vehicle when OEO/State vehicles are available. Lodging at local trainings (in Columbia) will not be reimbursed unless otherwise approved.

South Carolina meal reimbursement:

In-State

Breakfast	Lunch	Dinner
$6	$7	$12

Out-of-State

Breakfast	Lunch	Dinner
$7	$9	$16

Lodging must not exceed the approved the approved government rate. Visit https://www.gsa.gov/travel/plan-book/per-diem-rates for lodging per diems. Unapproved expenses incurred will be at the expense of the staffer.

Vehicles must be reserved on OEO's vehicle calendar. See OEO's Executive Assistant to retrieve vehicle books. Vehicle books include a travel log to be completed, key and fuel card. The fuel card will require employee's fuel pin for payment. The fuel pin is issued at the time of employment by Human Resources.

Traveler's Responsibilities – Employees must complete OEO's travel reimbursement form with the appropriate management signatures. All reimbursements will be submitted to OEO's Executive Assistant for processing.

Definitions

Community Action Agency (CAA) In the United States and its territories, **Community Action Agencies** (CAA) are local private and public non-profit organizations that carry out the Community Action Program (CAP), which was founded by the 1964 Economic Opportunity Act to fight poverty by empowering the poor as part of the War on Poverty.

Community Services Block Grant (CSBG) The Community Services Block Grant (CSBG), administered by the states, provides core funding to local agencies to reduce poverty, revitalize low-income communities and empower low-income families to become self-sufficient.

Grantee a person to whom a grant or conveyance is made. OEO is the grantee of CSBG and LIHEAP grants.

Health and Human Services (HHS) is the U.S. Department of Health and Human Services. Health and Human Services Awards is the Federal funding agency of CSBG and LIHEAP grants.

Low-Income Home Energy Assistance Program (LIHEAP) helps keep families safe and healthy through initiatives that assist families with home energy heating and cooling costs.

NASCSP The National Association for State Community Services Programs is the national association charged with advocating and enhancing the leadership role of states in preventing and reducing poverty. NASCSP serves as the liaison between Federal partners and states.

Office of Community Services (OCS) partners with states, communities and agencies to reduce the causes of poverty, increase opportunity and economic security of individuals and families and revitalize communities. OCS is a division within the U.S. Department of Health and Human Services (US HHS).

Office of Economic Opportunity (OEO) Created by the Community Economic Opportunity Act of 1983, the Office of Economic Opportunity (OEO) is the state's administering agency for the Community Services Block Grant, Low-Income Home Energy Assistance Program, Weatherization Assistance Program and Emergency Solutions Grant. OEO works in partnership with community action agencies and other non-profit agencies to administer and distribute funds for local initiatives designed to appreciably impact the causes of poverty.

On-Line Data Collection (OLDC) is the Federal Grant Solutions database used for Federal reporting. States submit all Federal reports via the Grant Solutions web portal.

Organizational Standards 42 U.S.C. §9914 requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. The Center of Excellence (COE) developed 58 standards for public and private entities.

Result Oriented Management Accountability (ROMA) The Monitoring and Assessment Task Force (MATF), a task force of federal, state, and local CSBG Network officials, created ROMA in 1994. Based upon principles contained in the Government Performance and Results Act of 1993, ROMA provides a framework for continuous growth and improvement among local CAAs and a basis for state leadership and assistance.

In 1998, the CSBG Reauthorization Act, Section 678E(a)(1), 42 U.S.C. § 9917(a)(1), made ROMA implementation a requirement for receiving federal CSBG funds, and established October 1, 2001 as the start date for reporting CSBG Network outcomes in the context of ROMA performance-based management principles. This statutory mandate changed both the nature and pace of ROMA implementation throughout the CSBG Network.

IM 152 outlines the new CSBG Annual Report and the role of ROMA Next Generation in the new Performance Management Framework. The IM places an enhanced emphasis on analysis and evaluation under ROMA Next Generation. This evaluation and analysis is actualized through the new CSBG Annual Report that will replace the CSBG IS beginning in FFY 2018.

Local CAAs are encouraged to undertake ROMA implementation actions that focus on results-oriented management and accountability. Organizational Standards require the review of particular documents by a ROMA Certified Trainer/Implementer. Therefore, OEO recommends each agency have one to two certified ROMA trainers or implementers on staff. To become a certified ROMA Implementer or Trainer visit the NASCSP website: https://nascsp.org/csbg/csbg-resources/roma/.

Subgrantee means the government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided

Model (State) Plan Submission Checklist

In **May**, CSBG/LIHEAP Senior Manager will **compose drafts for both CSBG/LIHEAP Model Plans** & distribute to OEO's Director, Senior Managers and Program Coordinators for review and edits.	YES	NO
Approved **drafts** will be **distributed to the CAA Network** (in **May**) to include Executive Directors, the State Association, CSBG/LIHEAP/WAP program and fiscal managers, for review, comments and edits.	YES	NO
In **June**, **OEO** will host a **workshop to receive feedback from the network on updates and edits to both CSBG and LIHEAP plans**. The Senior Manager will work with the Association to secure a venue and date and notify the network.	YES	NO
Public Hearing: A public hearing is required as a platform for public comment. The public hearing traditionally occurs at the beginning of **August**. The Public Hearing must occur prior to the submission of the State Plans, due to HHS September 1st.	YES	NO
Legislative Public Hearing: A Legislative Public Hearing is required to occur once every three years. OEO's Director will contact the Senate Clerk to assemble a subcommittee. Draft plans should be provided in a timely manner to allow the subcommittee time to review. The legislative Hearing must occur prior to the submission of the State Plans, due to HHS September 1st.	YES	NO
The hearing will be recorded, and a copy of the sign-in sheet and transcript will be uploaded to OLDC with the submission of the State Plans.	YES	NO
Public Hearing Advertisement: The CSBG/LIHEAP Senior Manager will draft a Public Notice for the Legislative/Public Hearing to be advertised in The State newspaper. OEO's Director and Attorney will review and approve the Public Notice for advertisement.	YES	NO
The CSBG/LIHEAP Senior Manager will provide the OEO Business Manager an approved copy of the notice to be submitted to the newspaper <u>for</u> **<u>advertisement at least three days prior to the scheduled hearing</u>**.	YES	NO
The CSBG/LIHEAP Senior Manager will then notify the CAA network via email of the scheduled hearing date, time and location.	YES	NO
Following the Legislative/Public Hearing, OEO's Senior Manger and staff will consider additional comments to include in the CSBG/LIHEAP State Plans. Final edits will be made to each plan and submitted to OEO's Director, Senior Managers and Program Coordinators for final review.	YES	NO

The CSBG/LIHEAP Senior Manager will submit South Carolina's final CSBG and LIHEAP State Plans with support documentation via OLDC, no later than September 1st.	YES	NO
The Senior Manager will save final copies of both CSBG and LIHEAP plans to OEO's shared drive and contact IT to have plans posted on the OEO website at the start of the program year.		
Other Model (State) Plan Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

LIHEAP Household Report Checklist

OEO LIHEAP Senior Manager will access the LIHEAP Household Report via OLDC. The Senior Manager will work with the statewide database Help Desk to run queries to collect data and complete the report.	YES	NO
The OEO LIHEAP Senior Manager will route the Household Report for review from the OEO WAP Senior Manager, OEO Director, LIHEAP Program Coordinator and/or other appropriate staff.	YES	NO
The OEO LIHEAP Senior Manager will submit the final Household Report to HHS via the OLDC website. A final copy of the report should be saved to OEO's shared drive with support data.	YES	NO
Other LIHEAP Household Report Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

LIHEAP Performance Measures Checklist

To complete the LIHEAP Performance Measures, the LIHEAP Senior Manager must collect LIHEAP customer data from a subgroup of vendors statewide (ex. SCE&G, Duke, etc.). In **December**, The LIHEAP Manager will contact the database Help Desk to compile customer data to send to each vendor to complete. The LIHEAP Manager will send a secure email to identified utility vendors to complete information specific to the OEO-identified LIHEAP customers. Vendors will be given 30 days to complete and return LIHEAP customer information to OEO.	YES	NO
In **December,** The OEO LIHEAP Senior Manager will access the LIHEAP Performance Measures report via OLDC. The Senior Manager will work with the statewide database Help Desk to run queries to collect data and complete the report.	YES	NO
The OEO LIHEAP Senior Manager will distribute fiscal-related sections of the Grantee Survey to OEO's Fiscal manager and/or other appropriate OEO departments to complete the report.	YES	NO
The OEO LIHEAP Senior Manager will compile data from internal departments, the statewide database and utility vendors to complete the LIHEAP Performance Measures. Upon completion, the Senior Manager will route the report to OEO's WAP Senior Manager, Fiscal Manager, LIHEAP Program Coordinator and/or other appropriate staff for review.	YES	NO
The OEO LIHEAP Senior Manager will submit the final LIHEAP Performance Measures Report to HHS via the OLDC website. A final copy of the report should be saved to OEO's shared drive with support data.	YES	NO
Other LIHEAP Performance Measure Report Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

CSBG Annual Report

As needed: In **December**, the CSBG Senior Manager will plan a statewide workshop with the State Association (to include reserving a hotel, meals and trainer(s)) to review the instructions and requirements to complete the Annual Report. The CSBG manager will notify the CAA network of the date, time and location via email.	YES	NO
No later than **January**, The CSBG Senior Manager will distribute links and forms to the CAA network to complete the Annual Report. Forms can be accessed via the NASCSP website. All CSBG eligible entities must submit their Annual Report to OEO's CSBG Senior Manager and/or Program Coordinators no later than February 15th.	YES	NO
The OEO CSBG Senior Manager will distribute fiscal-related sections of the Grantee Survey to OEO's Fiscal manager and/or other appropriate OEO departments to complete the report.	YES	NO
OEO's CSBG Senior Manager and CSBG Program Coordinators will review and/or enter each agency's data until all edits are made and variances are addressed. The State's submission will be reviewed by the Fiscal Manager, Director and/or other appropriate OEO staff.	YES	NO
OEO's CSBG Senior Manager will submit the final CSBG Annual report via the NASCSP submission website and the OLDC, no later than **March** 31st (or the posted deadline).	YES	NO
A copy of the CSBG Annual Report will be saved to OEO's shared drive. Once HHS has provided feedback and accepted the state's revisions, the Senior Manager will email the State's report to the CAA network along with each agency's individual report. All agency reports will be saved to OEO's shared drive.	YES	NO
Other CSBG Annual Report Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

CSBG/LIHEAP Administrative Guide

In **November**, the CSBG/LIHEAP Senior Manager, along with program coordinators, will draft/update the CSBG/LIHEAP Administrative Guide according to the approved State Plans for the upcoming program year. A **draft Administrative Guide** will be distributed to the CAA Network for review, edits and suggestions.	YES	NO
No later than **December 31st**, the CSBG/LIHEAP Senior Manager will distribute the **final Administrative Guide** to the CAA Network and save the final to OEO's shared drive.	YES	NO
The Senior Manager will contact IT to have the Administrative Guide posted to the OEO website at the start of the program year.	YES	NO
Other Administrative Guide Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

Notice of Federal Poverty Levels

It is the responsibility of the CSBG/LIHEAP Senior Manager to be attentive to the Federal Poverty Level updates published in the Federal Register on the Department of Health and Human Services website (traditionally in mid-January).	YES	NO
The CSBG/LIHEAP Senior manager will update the State's poverty guidelines for CSBG, LIHEAP and WAP using the updated FPL information. This information is to be reviewed and signed-off by the WAP Senior Manager, CSBG/LIHEAP Program Coordinator and other appropriate staff.	YES	NO
Once OEO has completed its internal review and accuracy of guidelines (at 100%, 125%, 150% and 200%) the CSBG/LIHEAP Senior Manager will compose a memorandum and notify the CAA network and statewide database of the updated FPLs and effective date. Note: The effective date should coincide with the database update.	YES	NO
The CSBG/LIHEAP Senior Manager will notify the statewide database via email of the updated FPLs and the effective date.	YES	NO
The Senior Manager will save a copy of the memorandum and FPLs to the shared drive.	YES	NO
Other Duties:	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

NOTICE OF PUBLIC HEARING

A combined Public Hearing, as required by the Community Services Block Grant (Section 676(a)(3)) and the Low-Income Home Energy Assistance Program (Section 2605(a)(2) and 2605(b)(12)), will be conducted by the Office of Economic Opportunity in the Edgar A. Brown Building, 1205 Pendleton Street, Room 364, Columbia, South Carolina, at 10 a.m., Friday, Aug. 9, 2019. At that time, public comments will be received on the proposed 2020 State Plans for CSBG and the LIHEAP Block Grants.

The U.S. Department of Health and Human Services (HHS), Administration for Children and Families, Office of Community Services administers the CSBG Program and the USHHS Division of Energy Assistance administers the LIHEAP Program. Federal governing regulations for CSBG are P.L. 105-285 and the Community Services Block Grant (42 U.S.C. 9901 et seq.), as amended; and for LIHEAP, the Low-Income Home Energy Assistance Act, Title XXVI of the Omnibus Budget Reconciliation Act of 1981, P.L. 97-35, as amended and more recently, the 2005 Energy Policy Act.

The CSBG State Plan identifies the state's intent to fund local community initiatives and statewide programs designed to reduce poverty, increase self-sufficiency and revitalize low-income communities. The plan provides eligibility requirements, benefit levels and the projected program allocation.

The LIHEAP State Plan outlines eligibility requirements, benefit levels and the projected funds for each category of LIHEAP assistance. LIHEAP funds are used to assist eligible households with home energy costs, energy crisis intervention and low-cost residential weatherization.

The proposed CSBG and LIHEAP 2020 State Plans are available and may be reviewed at the main office of each of the Community Action Agencies located throughout the state of South Carolina or at the Office of Economic Opportunity, 1205 Pendleton Street, Columbia, South Carolina.

Persons desiring to submit comments on the CSBG and/or the LIHEAP 2020 State Plans may do so in writing before this hearing. Comments may be mailed or hand-delivered to the Office of Economic Opportunity at the above-mentioned address. Comments on the 2020 CSBG and LIHEAP State Plans should be directed to Senior Manager Kelly Buckson.
4316341

admin
THE SOUTH CAROLINA
DEPARTMENT of ADMINISTRATION

Henry McMaster, *Governor*
Marcia S. Adams, *Executive Director*

OFFICE of ECONOMIC OPPORTUNITY
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FY 2020 Community Services Block Grant (CSBG) and Low-Income Home Energy Assistance Program (LIHEAP) Public Hearing Transcript

Good morning and thank you for participating in the combined FY 2020 Community Services Block Grant program and the Low-Income Home Energy Assistance Program Block Grant Public Hearing. This hearing is required by Federal legislation.

For the record today is Friday, August 9, 2019, and it is 10:00 AM. This hearing is being held in Room 364 of the Edgar Brown Office Building, located at 1205 Pendleton Street in Columbia, SC. This Public Hearing is being conducted by the SC Department of Administration Office of Economic Opportunity.

I am Kelly Buckson, Senior manager of CSBG and LIHEAP grants with the Office of Economic Opportunity. Buckson acknowledged the presence of OEO staff and guests attending the hearing (attendees also referenced in the Public Hearing sign-in sheet attached).

Each Community Action agency and the State Association were provided copies of both plans on May 9, 2019 and were afforded the opportunity to submit comments and edits. The announcement of today's combined Public Hearing was communicated to subgrantees on June 27, July 9 and again on August 7, 2019.

As required, a notice appeared in The State newspaper on Tuesday, August 6 through Thursday, August 8, 2019 announcing today's hearing. Any additional comments and/or questions may be expressed here today.

The mission of the Office of Economic Opportunity is to address the needs of the economically and socially disadvantaged citizens of SC. At this time, I will provide an overview of the Community Service Block Grant.

South Carolina operates a statewide anti-poverty program in accordance with the Community Services Block Grant (CSBG) Act through funds allocated by the US Department of Health and Human Services. These funds were first made available in 1982 and are expected to continue to be available through FY 2020. **SECTION 58-37-50 of SC's code of laws** names Community Action Agencies as the exclusive administer of CSBG, LIHEAP and Weatherization programs.

In FY 2019, the State received a CSBG award totaling $10,988,881. The projected allocation for FY 2020 is $10,000,000 based on the 2019 award. Funds will be distributed to the community

action agencies responsible for serving each of the counties in their service area. Currently, each of the 46 counties in SC is being served.

CSBG is flexible in that it allows agencies to assess the overall needs of the communities they serve and then offer various types of assistance intended to encourage low-income families and individuals toward self-sufficiency. To be income eligible for CSBG assistance, the total household income cannot exceed 125% of the Federal Poverty Guidelines.

1. In accordance with the CSBG Act, 90% of the funds will be used to fund general emergency assistance programs and local initiative projects which address the anti-poverty goals and may include projects in the areas of employment, education, income management, housing, nutrition or other areas which contribute to poverty.

2. The State's Discretionary projects will be funded up to 5% totaling $500,000 of the CSBG allocation. Discretionary funds totaling $350,000 will be used by the community action agencies for the purpose of supporting locally-operated youth leadership programs targeting low-income youth.

   Utilizing CSBG Discretionary dollars, OEO also funds the State Association which was awarded $185,000 in 2019.

3. The final 5% of the total allocation is retained by the State for Administration.

The 2010 Census Data, which was identified from the 2010 American Community Survey, is being used to determine county allocations based upon the number of low-income households in each county as compared to the state's total poverty population.

The Community Services Block Grant shall be coordinated with other human service and faith-based agencies and units of local government to better address the total needs of eligible customers and to hopefully avoid and, at a minimum, reduce assistance duplication.

The Results-Oriented Management & Accountability concept for reporting program outcomes will continue during FY 2020, as mandated by Federal legislation. And South Carolina Community Action Agencies will continue to implement the 58 Organizational Standards established by the Center of Excellence, as required by HHS.

For LIHEAP the total projected award for FY 2020 is $45,000,000 based on South Carolina's FY 2019 award of $45,497,728. Funding and programs are again provided through a network of community action agencies that serve eligible households throughout the state's 46 counties.

LIHEAP is designed to assist eligible households with home heating and cooling needs through the provision of energy assistance, home weatherization and intervention with energy providers. Income eligibility for assistance under this plan will be limited to households whose total gross monthly income does not exceed 150% of the Federal Poverty Income Guidelines which is published in the Federal Register. OEO allocates LIHEAP funds based upon the number of low-income households in each county as compared to the state's total poverty population.

The goals of LIHEAP for the 2020 Program Year are to expand outreach to previously un-served households, target energy assistance to eligible households with the highest energy needs and lowest incomes, increase energy efficiency, and identify resources to broaden the reach of LIHEAP funds.

In 2020, in coordination with the Community Services Block Grant and the Weatherization Assistance Program, LIHEAP will continue to support individuals in achieving energy self-sufficiency.

There are two components of LIHEAP. The first component provides a non-emergency Direct Assistance benefit. The second addresses residential heating and cooling emergencies within 18 to 48 hours, as required by federal statute. The state allows each household to receive up to two services during the program year.

- The Direct Assistance maximum benefit will remain at $750
- The Emergency Crisis Intervention Program will remain at a maximum of $1,000
- Where a crisis is identified, home heating/cooling window units may be purchased up to $700 per unit, at a maximum of two units per household, to sustain the winter cold or summer heat.

Please note these limits are subject to change depending on the state's final allocations and need.

To help supplement the LIHEAP program, Project Share is private dollars funded by Dominion Energy, Duke Energy and Piedmont Natural Gas. Project Share funds must be used in accordance with LIHEAP or rules established by the individual vendor, and only in the counties in which these vendors offer service.

The State of South Carolina allocates up to 15% of LIHEAP funds to supplement the Weatherization Assistance Program which is funded by the US Department of Energy.

South Carolina's CSBG and LIHEAP 2020 Program Year will operate on the calendar year from January 1 through December 31.

Please be aware that this plan is a working document and may be amended anytime during the Program Year. If this happens, an amendment will be submitted to US HHS, the Federal awarding agency and once approval is given, this office will make the Community Action Agencies aware of any changes.

2020 State plans are due to HHS, no later than September 1, 2019. OEO subgrantees, to include the State Association, are required to submit Community Action Plans for both CSBG and LIHEAP, electronically through the statewide database no later than 5:00 PM on Friday, August 30, 2019. Subgrantee Community Action Plans are required prior to receiving a grant award.

At this time, we will acknowledge comments submitted and any additional updates to be made to the 2020 CSBG and LIHEAP State Plans:

OEO did receive a comment from Ms. Mary Lynne Diggs who represents South Carolina's Head Start Collaboration Office, encouraging the OEO to include the 2020 census initiative as part of its goals in the CSBG State Plan. OEO will encourage its State Association and the Community Action network to develop Complete Count Committees to increase awareness of and to support residents to respond to the 2020 Census. Count committees are instrumental in planning for and supporting participation for hard-to-count populations which include households with low-incomes, renters, rural populations, single-parent head of households, and ethnic or minority populations.

Are there any additional questions or comments at this time?

Mr. Arnold Collins, Executive Director of Palmetto Community Action Partnership wanted it to be entered in the record that the state (of South Carolina) has a coalition of 55 different agencies made up of private and non-profits to help with the census. He asked OEO to advocate on behalf of South Carolina's Community Action network to get connected to that coalition for reasons indicated by Mary Lynne. Mr. Collins said, "I would like for us to be publicly known for working with this initiative."

OEO acknowledged the presence of South Carolina's State Association (SCACAP). Kelly Buckson recognized them as the proper entity to advocate and take the lead on making South Carolina's CAA network part of the coalition.

No further comments were made.

Kelly Buckson said proposed comments and edits will be considered prior to the submission of South Carolina's 2020 State Plans due to HHS September 1. Once approved by HHS, OEO will distribute the final State Plans to the network.

The FY 2020 CSBG and LIHEAP State Plans Public Hearing adjourned at 10:14 AM.

DEPARTMENT *of* ADMINISTRATION

South Carolina Office of

ECONOMIC OPPORTUNITY

Program Year 2020 Administrative Guide for

CSBG & LIHEAP

1205 Pendleton Street, Edgar A. Brown Building
Columbia, South Carolina 29201
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Effective: May 29, 2020

CSBG

Community Services Block Grant

The Community Services Block Grant (CSBG), administered by the states, provides core funding to local agencies to reduce poverty, revitalize low-income communities and to empower low-income families to become self-sufficient. The CSBG is currently authorized under the 1998 CSBG Act.

Agencies in the CSBG network are Community Action Agencies (CAAs), created through the Economic Opportunity Act, a predecessor of the CSBG. Community representation and accountability are hallmarks of the CSBG network, where agencies are governed by a tri-partite board. This board structure consists of elected public officials, representatives of the low-income community, and appointed leaders from the private sector.

CSBG is not required to implement verification requirements, therefore, **"Non-citizens, regardless of their alien status, should not be banned from Community Services Block Grant programs"** (CSBG IM No. 30, US Department of HHS for Children and Families Office of Community Services Division of State Assistance).

The federal income eligibility is based on a household's earnings/contributions and must not exceed 125 percent of the federal poverty level (FPL).

2020 COMMUNITY SERVICES BLOCK GRANT CFDA 93.569
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Appendix A: GEAP Checklist

Appendix B: Local Initiative Project Checklist

Appendix C: Youth Leadership Checklist

Appendix D: CSBG ROMA Outcome Measures Report

New!!! **Appendix E: Mortgage Assistance Affidavit**

PROGRAM OVERVIEW

CSBG services shall seek to promote social and economic self-sufficiency through the achievement and development of knowledge, skills and abilities that will enable low-income individuals to effectively respond to and manage those life circumstances that negatively impact their well-being and accomplishment of life goals. Through the strengthening of individual and family competencies, services shall enable low-income persons to mobilize the resources and support necessary to deal with existing problems, needs and future aspirations.

Linkages will be developed with local entities to fill identified gaps in services through the provision of information, referrals, case management and follow-up consultations. Funds made available to eligible entities will be coordinated with other public and private resources and may be used to support innovative community and neighborhood-based initiatives with the goal of strengthening families.

State Community Service Programs include:

- Employment
- Education
- Income Management
- Housing
- Emergency Services
- Nutrition
- Self-Sufficiency
- Health

Community Needs Assessment

The State will secure from each eligible entity, a **current community-needs assessment** for the community served, to include each county served, which may also be coordinated with community-needs assessments conducted for other programs. OEO requires a comprehensive needs assessment once every three (3) years. The needs assessment should be updated, as needed, during the interim years. The next **comprehensive needs assessment is due to OEO in August 2022 with the submission of the program year (PY) 2023 Community Action Plan.**

Results-Oriented Management and Accountability (ROMA) System

Eligible entities will participate in and comply with the ROMA System, which the Secretary facilitated development of pursuant to Section 678E, utilizing SCROMA and provide a description of specific measures to be used to substantiate the outcomes of each funded program and eligible entity (CAA)performance in promoting self-sufficiency, family stability, and community revitalization.

Grant Award and Disbursements

Agencies will receive the grant award(s) based upon OEO's receipt of the federal notice of award(s), the timely completion, receipt and final OEO approval of the agency's CSBG Community Action Plan and application budget.

Updated!!! INCOME ELIGIBILITY REQUIREMENTS

Income Eligibility

Application must be made in the designated service area. The Federal Poverty Guidelines must be used as the primary criterion in determining income eligibility. To receive assistance under any CSBG project involving direct services, an applicant's total household income must not exceed 200% of the poverty level. Household is defined by the Bureau of Census as consisting of all persons who occupy a housing unit (i.e., house or apartment), whether they are related to each other or not. Total household income is based on income at the time of application.

New!!! One-time Income Verification

Income eligibility will be determined once during a program year considering the household's 30-day income at the time of the initial application. If the household meets the income guidelines, the household will be considered eligible for all qualifying grants for the remainder of the program year. If the person/household seeks additional assistance during the same program year, the applicant will only be required to present a current bill and supporting documentation.

Calculating Income

The purpose of the income determination is to establish an individual's eligibility for services in accordance with the statutory definition of poverty level. The goal is to implement program services that will enhance and promote self-sufficiency, and not to penalize low-income persons as they move from poverty to self-sufficiency.

When calculating total household income, include all income (use actual amount; do not round) for the last 30 days (including the date of application), to determine "gross" income. Use gross SSI and SSA benefit amounts.

How to calculate Child Support

When calculating child support to determine applicant eligibility, **add all payments made within 30 days, to include the date of application, and enter the total "gross" amount into DBA using the Monthly pay frequency.**

Pay Frequencies

With the exception of child support, income should be entered in DBA FACSPRO based on the frequency of payroll periods using gross amounts: when an applicant or household member is paid **weekly** throughout the 30-day period, enter the income as "weekly"; if paid **bi-weekly** (every two weeks or 14 days) enter income as "bi-weekly; if paid **semi-monthly** (twice per month) enter as semi-monthly; if **monthly** (paid once each month) enter as monthly.

When an applicant or member of the household has earned only one paycheck in the 30-day period, enter it based on the frequency of payroll period, also. When calculating the income of **day laborers**, collect all income received within 30 days of the date of application, and calculate income using the monthly pay frequency. SC ROMA (DBA FACSPRO) will provide the calculations to determine eligibility.

When manually calculating income, use actual amounts (do not round amounts). For example, if the amount is $150.50, **enter** $150.50 not $151.00. To determine the accurate 30-day income to be entered into DBA FACSPRO, the calculations are as follows:

Weekly: (((amount1 + amount2 + amount 3 + amount4) /4) * 4.33)

Bi-Weekly: (((amount1 +amount2) /2) * 2.165

Semi-Monthly (amount1 + amount2)

Monthly (monthly income x 12)

CONTRIBUTION/INCOME EXCLUSIONS

Contributions from Nonprofit Organizations

Contributions/donations from non-profits should not be included as income unless the funds are given directly to the customer. Funds paid directly to the vendor on the behalf of the customer should not be counted as income.

COVID-19 Stimulus Check

One-time **COVID-19 Stimulus checks** should not be included as income.

Income Tax Refunds

Tax Refunds should not be included as income (refer to US HHS IM 119 or LIHEAP Memorandum No. L08-05 for additional information).

Income from Minors

Income is not calculated for persons under age 18 (to determine income eligibility); however, if the youth provides finances to the adult household member for household expenses, the amount must be included as income to the adult under miscellaneous/cash contributions. If household members under 18 receive Social Security or Disability income, the gross amount must be included as income under the payee or custodial adult's name living in the household.

Please note**: The current DSS printout may not be used to verify members of the household, or earned income**; however, it may be used to verify utility check, child support and Temporary Assistance for Needy Families/Family Independence (TANF/FI) amounts if listed on the printout.

Student Loans

Student loan refunds should be included as income only if funds are used to help sustain the household.

Disaster Relief

Income from disaster relief assistance, such as FEMA, should not be included as income.

New!!! UNALLOWABLE CHARGE DEDUCTIONS

To alleviate hardships and streamline service delivery, CAAs may deduct unallowable fees from the customer's/household's maximum benefit .

It is the responsibility of the agency to determine if the benefit will alleviate the household's emergency. If the customer's benefit will not alleviate their emergency or meet the household's immediate need, the customer will be required to pay the necessary amount or CSBG service cannot be provided.

AWARD LETTERS

(Social Security, Supplemental Security Income, VA Benefits, Pensions, etc.)

A current year's award letter may be used to verify income, using the gross amount.

Supplemental Security Income (SSI)

Proof of disability is to be provided from a current or prior year's award letter from the Social Security Administration (SSA), a current year's letter from Vocational Rehabilitation or the Veterans Administration, disability income check, or an official handicapped sticker bearing the appropriate photograph. Disability may be either temporary or permanent. This medical documentation must be attached to the application on file.

"Disabled" describes an individual who has a physical or mental impairment that prohibits one from working at any substantial employment that otherwise s/he would reasonably be able to perform and that will probably continue for an indefinite period of at least 12 months or who has been certified as permanently and totally disabled by a state or federal agency qualified to render that decision. Short-term disability and workman's compensation are also recognized as a form of disability.

A spouse or child receiving Social Security benefits is not necessarily disabled. There are three types of social security payments: (1) retirement payments as early as age 62, (2) survivor payments made at any age, and (3) disability payments made to disabled persons under the age of 65. The medical standards for disability are the same for Social Security (SS) as for Supplemental Security Income (SSI) for individuals age 18 or older. There is a separate definition of disability for SSI children under age 18.

SSI payments are made in three categories: (1) to aged individuals – 65 or older, (2) to disabled persons under 65 who have an impairment so severe the person cannot do any substantial work, and the impairment will last 12 months or result in death, and 3) to blind individuals under age 65 and legally blind. Even children may receive SSI payments if blind or disabled, based upon the parent(s) resources and income.

Any questions, you may contact your local Social Security office or call 1-800-772-1213. SSA has asked that CAAs contact them at the number or your local SSA office if documents are required to service customers rather than sending customers to their office for documents. "Understanding SSI" is available online at: www.socialsecurity.gov/ and https://www.ssa.gov/ssi/text-understanding-ssi.htm.

How to Calculate Self-employed Individuals

When an individual is self-employed and operating a business outside of the home, use the "Net" Profit. An individual must provide the **entire** 2019 (most recent) signed Federal Tax Form pertaining to the business (e.g. 1040 Schedule C of Profit or Loss or 1040 Schedule C-EZ). For Form 1040 schedule C, use total from line 31(Net Profit), divide it by 12 = monthly income amount. If using form 1040 schedule C-EZ, line #3 should be used. Other IRS forms include Form 1065 Partnership Return of Income (request Tax Schedule K-1 Form 1065 Partner's Share of Income, Deductions, Credits), Form 1120S (request Tax Schedule K-1, Form 1120S). When an individual is self-employed, operating an in-home business, such as childcare, use the "gross" income. An individual must provide **entire** 2019 (most recent) signed Federal Tax Form pertaining to the business.

When only recently self-employed, an individual must provide quarterly or monthly tax statements provided by the South Carolina Department of Revenue. If the self-employed individual does not file his/her taxes quarterly, provide a copy of the business license and Declaration of Zero Income form. **How to calculate quarterly taxes:** Divide the most recent quarterly tax amount by 3 = average monthly income amount. Appointment books should not be used to verify income. When an individual's business has been terminated, verification of termination is required (e.g. state certification verifying termination).

Declaration of Zero Income

Persons with Zero (0) income must complete the Declaration of Zero Income form. If the applicant is receiving funds from someone other than a household member to pay their bills, determine the monetary amounts, calculate those amounts and enter the average monthly income total into DBA as "Contributions" or "Miscellaneous Income". Items that *could* be captured on the Declaration of Zero Income form include: child support (contributions from a parent that is not court-ordered), utility check or monetary contributions to the household outside of employment. ***Note: Be sure not to duplicate income.** *

If a youth (under age 18) provides finances to the adult household member for food, shelter or utility expenses, the amount must be included as income to the adult under miscellaneous/cash contributions on the Declaration of Zero Income form.

The Declaration of Zero Income form should be used as a last resort, when all efforts have been exhausted to provide enough supporting documentation.

Utility Checks

Utility checks made payable to and **issued directly to the customer** should be calculated as income when determining eligibility since the customer is not required to remit/forward this payment to the utility vendor as payment for services.

Utility checks **issued directly to vendors** monthly on behalf of applicants who reside in subsidized housing are benefits to subsidize the already very low-income status of those households. In these instances, benefits are not to be counted as income on the application.

Serving Families with Foster Children

When serving households with state-placed foster children, the foster child should **not** be included as a member of the household. These children are considered wards of the state. A DSS placement letter is required in the file. Monthly allowances made to foster parent(s) as reimbursement for the cost of caring for the child should not be counted as income. However, separate wages paid to the parent should be included as income, as these funds are considered payment to the temporary caretaker.

PROGRAM ELIGIBILITY

After an applicant has been determined to be income eligible, program eligibility must be established in accordance with the State Plan, the Subgrantee's approved CSBG Community Action Plan and/or Federal and State laws, policies and procedures.

Note: There is no prohibition against an eligible entity providing CSBG-funded services/benefits to members of its tripartite board, its staff or members of their families who apply for those services/benefits, provided that:

(1) the applicant meets all applicable eligibility criteria for the services/benefits; (2) the applicant does not receive preferential treatment in receiving the services/benefits due to his or her connection with the eligible entity; and (3) the services/ benefits are provided on terms similar to those provided to individuals who are not so connected to the entity.

Neither the applicant nor a member of his/her family should make the determination of whether the applicant is eligible for the CSBG-funded services/benefits.

See https://www.caplaw.org/resources/Publication Documents/CAPLAW_ClientEligibility_Sept2013.pdf for more information.

The Executive Director must approve all agency employee, board member and employees of other CAA's applications for assistance by signing and dating the application BEFORE payment is rendered.

All customer documents must be current and accurate to determine program and income eligibility.

Applicant must provide a copy of his/her current official (government or state-issued) pictured identification such as State (SC) Identification Card, SC Driver's License, Military ID, Employment ID, Passport, Voter Registration Card bearing photo. Eligible residents may obtain a SC Identification Card from the SC Department of Motor Vehicles.

All information provided for income and program eligibility must be consistent. If a client's address listed on the application or bill does not match the address listed on their driver's license/ID, their address may be changed and printed online at: https://www.scdmvonline.com/dmvpublic/trans/AddrChange.aspx. If the online process cannot be accomplished, the customer is responsible for providing the current driver's license/ID.

If an elderly applicant (aged 75+) does not have a driver's license or a state-issued ID card, an expired ID with a clarifying statement, or a picture of the applicant and a copy of the applicant's birth certificate may suffice. If an elderly applicant does not have a birth certificate, a letter from the Department of Health and Environment Control (DHEC) stating that the client does not have a birth certificate on file is appropriate.

Serving Undocumented Immigrants

CSBG is not required to implement verification requirements, therefore, **"Non-citizens, regardless of their alien status, should not be banned from Community Services Block Grant programs"** (CSBG IM No. 30, US Department of HHS for Children and Families Office of Community Services Division of State Assistance).

Frequency of CSBG Services

The frequency of CSBG services is determined by the eligible entity (CAA)and approved by OEO via the agency's annual Community Action Plan.

Maximum Allowance of Services

The maximum amount of CSBG funds allocated per household is determined by the eligible entity (CAA)and approved by OEO via the agency's annual Community Action Plan.

CSBG CLIENT ASSISTANCE PAYMENTS

Each check and/or voucher must be made payable only to the vendor from whom the applicant proposes to obtain services.

The voucher/check or other form of payment used for direct client (monetary) assistance shall be documented as follows:

- CAA's (Subgrantee) name as payer;
- Vendor's name as payee; and
- Eligible applicant's name as recipient.

CSBG PROGRAM REPORTING

Logic Model Targeting & Projections

A logic model (also known as a logical framework, theory of change, or program matrix) is a tool used by funders, managers, and evaluators of programs to evaluate the effectiveness of a program. They can also be used during planning and implementation.

The GPRA legislation (Government Performance and Results Act of 1993/ Modernization Act of 2010) refers to "**performance plans**" and "**performance goals**," which both relate to the concept of planning for specific results. This references two kinds of targets: the number of people who are expected to be served and the number of people (of those served) who are expected to achieve an outcome. These targets are identified in planning, so they can be assessed in the evaluation phase.

To improve program targeting, OEO allows agencies the flexibility to adjust program projections as the state receives updated notices of funding. Subgrantees will have a maximum of ten (10) business days following South Carolina's notice of CSBG Awards to update services and/or projections on the ROMA logic model. Logic models and targets cannot be altered after the state's final award has been received for the program year. Instead, 20% variances below or exceeding the targeted projections should be explained in the annual report *(Ex. Anticipated funding was reduced, therefore, participant enrollment was limited).* Completed logic models (column 5, Actual Results) are due to OEO no later than January 15, 2021.

CSBG ROMA Outcome Measures Report

The CSBG ROMA Outcome Measures Report is due to OEO quarterly on the 15th day following each quarter, for the first through third quarters. Each agency's Annual Report submission (due to OEO no later than February 15th) will serve as the agency's 4th quarter report. All

reports must be submitted in a timely manner; timeliness will be reported on risk assessments.

Certified ROMA Trainer/Implementer Tracking Report

To comply with the requirements for ROMA Certified Trainers/Implementers, OEO will monitor each ROMA Trainer/Implementer to ensure the accomplishment of applied training hours. The tracking report will be due to OEO quarterly on the 15th day following each quarter. All reports must be submitted in a timely manner; timeliness will be reported on risk assessments.

Each Nationally Certified ROMA Trainer (NCRT) is required to conduct at least one full Introduction to ROMA training each year (this applies to every year that you are an active NCRT), and provide a report of your training activities to the national office (via http://www.roma-nptp.org/training_info.html).

To assure on-going competence as a ROMA Professional, National Peer to Peer Training (NPTP) requires NCRTs attend the In-service Continuing Education Program (ICEP) at least once in each recertification period.

If you have been certified as an Implementer during this period (making you dually certified), or if you became a Master Trainer during this period, you can use this certification in place of either of these two afore-mentioned items. Make a note in the appropriate text box.

Note: Even if you use this option, you are to provide a plan for provision of at least one Intro to ROMA training in each of the upcoming three years. **WITHOUT RECERTFICATION, NCRTS WILL BECOME INACTIVE.**

Board Meeting Minutes

To assure board compliance (as outlined in South Carolina's 2020 CSBG State Plan), eligible entities and the State Association will provide the OEO, **via DBA's Board Pro**, a current board of director's roster and completed and signed board composition forms. Changes in composition are to be reported to the OEO within thirty (30) days of the change. Additionally, Subgrantees will upload minutes to Board Pro for each board meeting no later than thirty (30) days following the approval of the minutes in DBA.

Organizational Standards

To ensure the consistent achievement of the 58 Organizational Standards as required by OCS, OEO requires each CSBG eligible entity (CAA)to upload and maintain all standards in DBA for OEO approval. **Standards must be achieved according to the Calendar of Required Actions, no later than December 31st each program year.**

UPDATED: 2020 FEDERAL POVERTY INCOME GUIDELINES
USE FOR CSBG SERVICES COMPUTED AT 200% OF POVERTY GUIDELINES

FAMILY SIZE	200% MONTHLY POVERTY GUIDELINE	200% ANNUAL POVERTY GUIDELINE
1	$2,126.67	$25,520.00
2	$2,873.33	$34,480.00
3	$3,620.00	$43,440.00
4	$4,366.67	$52,400.00
5	$5,113.33	$61,360.00
6	$5,860.00	$70,320.00
7	$6,606.67	$79,280.00
8	$7,353.33	$88,240.00
For each additional person, add	$746.67	$8,960.00

The CARES Act authorizes states to revise the income limit for eligibility ceiling from 125 to 200 percent of the federal poverty level for CSBG services furnished during fiscal years 2020 and 2021.

South Carolina's updated CSBG Federal Poverty Income Guidelines were effective on April 20, 2020.

GEAP

(General Emergency Assistance Program)

Each eligible entity (CAA)is required to provide an emergency assistance project referred to in the State of South Carolina as the General Emergency Assistance Program (GEAP). The maximum service amount per household is determined by the agency and approved by OEO. **Not more than one GEAP service should be provided to a household within a 30-day period.** The purpose of this project is to assist low-income persons in meeting the emergency needs confronting them within 72 hours or sooner (42 U.S.C. § 9908(b)(1)(A)(vi); PY 2020 CSBG State Plan). The timeframe required to address emergency services begins once the agency collects all documents necessary to determine the household's eligibility.

The U.S. Department of Health and Human Services has stated that agencies are to have mechanisms in place to resolve emergencies over weekends and holidays. This may include a 24-hour contact name and number or may provide for staff to work weekend hours in case of fires, life threatening temperatures and/or acts of God. Carefully document files in these situations.

Section 678F(a)(1) of the CSBG Act (Limitations on use of funds) does not allow the State or any other person with which the State decides, to use CSBG funds for the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or facility.

GEAP Allowable and Unallowable Charges

GEAP funds ***may be*** used to pay:

- Rental Deposits
- Mortgage Assistance *(equivalent to one-month)*
- Emergencies approved by OEO

GEAP Allowable and Unallowable Charges (Continued)

- Late Fees
- Court Costs
- Lot Rent
- Mandatory and/or regulated fees required for service
- Water
- Sewer

GEAP funds ***may not*** be used to pay:

- Meter tampering charges, security systems, returned check fees or any other illegal charges.

EXAMPLES OF GEAP EMERGENCIES

NOTE: This list is not inclusive of all allowable emergencies

- Eviction/Eviction Notice/Notice from Landlord
- Emergency Temporary Shelter
- Emergency Medical Services
- The customer's dwelling is burned, or damaged by an act of God to the extent it is uninhabitable
- Emergency assistance for purchase of appliances and/or Furniture (burn outs and acts of God, only)
- Reduction of Income (layoff, reduction in force), proven medical emergency that caused proven financial hardship, proven reduction in income (more than 40%) or death of primary income provider/wage earner (within 90 days of application).
- Long-term unemployment resulting from proven layoff or reduction in force (over 180 days but not more than 365 days) or exhaustion of UI benefits (within past 90 days) if customer is consistently seeking employment (proof required).
- Exhaustion of personal savings (within past 60 days). Proof, such as 2-month bank statement, is required.
- Emergency vehicle repairs for *employed persons* (proof required) within 30 days of application (official receipt required). Repair amount must be comparable to amount needed.
- Undocumented Immigrant(s) in need of heating/cooling assistance may be served with GEAP funds.

Other emergencies not categorized should be established by the Subgrantee in the Community Action Plan

submitted to OEO. Documentation must be present regarding the rationale for considering the situation an emergency, for example, a lack of clothing (receipt required) in the household or a lack of food (food policy outlining amount provided to a household based on the number of people in the household required and receipt required).

New!!! CSBG MORTGAGE ASSISTANCE

CSBG funds may be utilized to provide mortgage assistance including taxes, insurance and interest effective April 22, 2020. It is up to the agency to determine the maximum amount for mortgage assistance.

Proof of emergency and proper documentation is required. The applicant must reside at the address stated on the mortgage bill/title/deed; however, when the mortgage bill/title/deed is in the name of a household member other than the applicant, the applicant must provide proof s/he resides at that address, relationship to applicant (if applicable) and approval to access that account. Husband and wife living in the same household do not need approval to access the account.

Mortgages paid utilizing the agency's standard CSBG allocation is limited to a one-month mortgage assistance payment during the program year, not to exceed the agency's determined maximum for mortgage assistance.

GEAP Customer Assistance

The applicant must reside at the address stated on the lease/bill; however, when the lease/bill is in the name of a household member other than the applicant, the applicant must provide proof s/he resides at that address, relationship to applicant (if applicable) and approval to access that account. Husband and wife living in the same household do not need approval to access the account.

A lease/bill will no longer be accepted if the person whose name appeared on the lease/bill has been deceased longer than 12 months (proof needed), lease/bill is in a minor child's name, or lease/bill is in non-household adult's name.

When the bill is in the name of the landlord, the landlord must provide a statement indicating that the applicant is permitted to access that account, to include making payment on the account. The file must include this documentation. Customer must provide a current Lease Agreement indicating the account is in the landlord's name, but the bill is the responsibility of the tenant.

GEAP funds cannot be used to pay utility bills in 2020 unless the total allocations for **LIHEAP and Project Share** funds have been exhausted for the program year, by county or the household includes an undocumented immigrant facing a home heating/cooling emergency. This must be proven during monitoring or funds will have to be reimbursed.

New!!! It is OEO's intent to offer customers the greatest benefit to eliminate their immediate emergency. Therefore, there are no restrictions on how far back an agency can pay towards the customer's debt, regardless of when the debt was accrued, if expenses are allowable and in accordance with the grant/approved program.

Example: When serving a customer with a 2020 bill, allowable charges accrued at anytime in 2019 or prior, may be paid up to the maximum dollar amount.

GEAP Customer Files

Each customer file must contain current, accurate and legible documents to include: the current/completed/signed application reflecting FPL and all household members, income proof for all household members 18+ years old, current photo identification of the applicant, current lease/bill, income screens, DBA Action Plan screenshot, unallowable cost calculations, vouchers, check numbers and all other pertinent information/documents.

REFERRALS: Evidence of referrals, as outlined in the approved Community Action Plan, must be documented in client files, when applicable.

LOCAL INITIATIVE PROJECTS

Local initiative projects shall include those services and activities which address the anti-poverty goals as set forth in Section 676 of the CSBG Act and may include projects in the areas of employment, education, income management, housing, nutrition, or other areas in which there may be obstacles which impede the attainment of social and economic self-sufficiency by low-income persons. **The specific projects for a given service area shall be determined by** the local community action agency through **a community needs assessment** process. Therefore, anti-poverty strategies shall be based on locally defined needs and must involve services which are based on a community's own analysis of the poverty related problems.

Participant Stipends

OMB Omni Circular states, "Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia, or training projects. These costs are allowable with the prior approval of the awarding agency."

All proposed stipends for CSBG programs must be sent to OEO in writing, clearly justifying the stipends relative to the programs' success (e.g. Employment Skills Training/Internships). OEO will send a written notification of approval for the stipend. Each participant's file must provide adequate documentation to support these expenditures.

The following information must be submitted to OEO for approval if stipends are being charged to CSBG:

1. Identify eligibility criteria;
2. Define who's eligible;
3. Explain how you arrived at the stipend figure; and
4. Explain why the stipend is being offered (stipends are allowed for childcare, transportation, or time lost from a job to attend sessions and must be justified with receipts)

YOUTH LEADERSHIP PROGRAM (YLP)

In PY 2020, in compliance with section 676(b)(1)(B), the State's Youth Leadership Program (YLP) will provide income-eligible elementary, middle and high school students educational opportunities targeting individual improvements in academic, behavioral and social achievement, resulting in increased self-sufficiency.

To reduce staffing costs, YLP staff, excluding full-time agency staff, may be obtained on a contractual basis. **Note:** Agency must refer to the OEO Fiscal Guidance and Procedural Manual prior to contracting for professional consultant services.

Serving Families with Foster Children

When serving households with state-placed foster children, the foster child should **not** be included as a member of the household. These children are considered wards of the state. A DSS placement letter is required in the file. Monthly allowances made to foster parent(s) as reimbursement for the cost of caring for the child should not be counted as income. However, separate wages paid to the parent should be included as income, as these funds are considered payment to the temporary caretaker.

YLP participants must not be paid simply for participating in the program or attending classes.

YLP File Maintenance

- Each student must complete an application each program year (January 1 – December 31) for enrollment to determine/verify eligibility.
- Provide a master list of eligible recipients entering the YLP program, include date enrolled, date completed or date and reason the student discontinued the program.
- Document that each eligible student qualifies by verifying the student's household is within the CSBG income guidelines.
- A pre- and post-assessment must be documented in each student's file. The pre-assessment is to be completed upon a student's acceptance/enrollment to YLP. Document each student's post-assessment with actual outcomes (i.e. personal and academic achievements, improvements in life skills).
- Document each student's attendance with attendance logs, including the student's signature, date and time in attendance, with the coordinator's signatures and date.
- Document each scheduled workshop with coordinator's activity report, include in the report, the date, time and place of each workshop, activities performed, and coordinator's signature and date.
- Document field trips with signed parental permission, Disclosure Authorization and Release Form, field trip permission slip, approval attendance logs, costs, and activity report signed and dated by the coordinator.

Note: All students enrolled in the YLP, regardless of age, must have parental consent.

- Document supplies, or other materials distributed with student's signature, date and purpose of activity.

Youth Leadership Stipends

OMB Omni Circular states, "Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia, or training projects. These costs are allowable with the prior approval of the awarding agency."

All proposed stipends for CSBG programs must be sent to OEO in writing, clearly justifying the stipends relative to the programs' success (e.g. Employment Skills Training/Internships). OEO will send a written notification of approval for the stipend. Each participant's file must provide adequate documentation to support these expenditures.
The following information must be submitted to OEO for approval if stipends are being charged to CSBG:

5. Identify eligibility criteria;
6. Define who's eligible;
7. Explain how you arrived at the stipend figure; and
8. Explain why the stipend is being offered (stipends are allowed for childcare, transportation, or time lost from a job to attend sessions and must be justified with receipts)

Youth Leadership Internships

The following information must be submitted to OEO for approval if internships are being charged to CSBG:

1. Must be outlined in agency's policies and procedures manual (copy required with Community Action Plan);
2. Identify eligibility criteria;
3. Define who's eligible;
4. Explain how you arrived at the hourly rate;
5. Memorandum of Understanding is required between agency and employer and must include termination policy (termination should occur as soon as possible if internship is not working appropriately); and
6. 1099 Forms must be provided to each student receiving more than a total of $600 per year for income tax purposes and tax regulations must be adhered to.

New!!! Technology Initiative for Youth

In a 2018 Center survey conducted by the PEW Research Center, about one-in-five teens ages 13 to 17 said they are often or sometimes unable to complete homework assignments because they do not have reliable access to a computer or internet connection (https://www.pewresearch.org/fact-tank/2018/10/26/nearly-one-in-five-teens-cant-always-finish-their-homework-because-of-the-digital-divide/).

To combat the digital divide and allow low-income children access to internet and technology to better compete with their counterparts, agencies may provide laptops and monthly internet service to active Youth Leadership Participants.

Proper documentation, to include procurement, receipts, internet contracts/bills, etc. must be in the student's file.

Youth Leadership Staff training

The OMB Omni Circular (§200.472) emphasizes that staff training, and education costs are allowable expenditures. To be approved, OEO requires the agency must demonstrate that all staff training, and education costs are directly related to the program requirements and are designed to increase the employee's effectiveness within the program. Subgrantees must expend all YLP grant funds during the period January 1 – December 31. All unexpended YLP funds and State CAP Association funds must be remitted to OEO at the close out of the grant period (by February 15th along with the final FSR).

GEAP Checklist

DBA APPLICATION	YES	NO
ACTION PLAN COMPLETED	YES	NO
CURRENT LEASE AGREEMENT (Emergency Rental Assistance)	YES	NO
FOLLOW-UP COMPLETED (If Applicable)	YES	NO
TOTAL HOUSEHOLD INCOME DOCUMENTATION (Weekly/Bi-Weekly/Semi-monthly/Monthly)	YES	NO
LEGIBLE PICTURE ID	YES	NO
PROOF OF EMERGENCY LIST: _____ (EX: EVICTION NOTICE/ FIRE REPORT/ PRESCRIPTIONS)	YES	NO
PROOF OF COLLABORATIVE EFFORTS (IF BALANCE WAS NOT PAID IN FULL) EX: CUSTOMER CONTRIBUTION, REFERALS, PARTNERSHIPS, ETC.	YES	NO
RENTAL AFFIDAVIT/MORTGAGE STATEMENT	YES	NO
VOUCHER / CHECK NUMBER	YES	NO
REFERRAL FORM (If Applicable)	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE:_____

Appendix B

Local Initiative Project Checklist

FAMILY APPLICATION	YES	NO
ACTION PLAN COMPLETED	YES	NO
FOLLOW-UP COMPLETED (If Applicable)	YES	NO
TOTAL HOUSEHOLD INCOME DOCUMENTATION (Weekly/Bi-Weekly/Semi-Monthly/Monthly)	YES	NO
LEGIBLE PICTURE ID	YES	NO
VOUCHER/ CHECK NUMBER	YES	NO
REFERRAL FORM (If Applicable)	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

Appendix C

Youth Leadership Checklist

FAMILY APPLICATION	YES	NO
ACTION PLAN COMPLETED	YES	NO
FOLLOW-UP COMPLETED (IF APPLICABLE)	YES	NO
TOTAL HOUSEHOLD INCOME DOCUMENTATION (Weekly/Bi-Weekly/Monthly)	YES	NO
LEGIBLE PICTURE ID'S (PARENT & STUDENT)	YES	NO
LESSONS IN CHARACTER	YES	NO
SIGN-IN SHEETS	YES	NO
PRE-ASSESSMENT / POST-ASSESSMENT	YES	NO
PROGRAM EVALUATION (END OF PROGRAM YEAR)	YES	NO
VOUCHER / CHECK NUMBER	YES	NO
REFERRAL FORM (IF APPLICABLE)	YES	NO
TIMESHEETS (IF APPLICABLE)	YES	NO
GRADES (IF APPLICABLE)	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

CSBG ROMA OUTCOME MEASURES REPORT

Circle the Quarterly Reporting Period			
1	2	3	~~4~~

Agency reporting: _____

Instructions: Report year-to-date achievements toward annual projections by program.

***National Goal 1: Individuals** and **families** with low incomes are stable and achieve economic security.*
***National Goal 2: Communities** where people with low incomes live are healthy and offer economic opportunity.*
National Goal 3:** People with low incomes are engaged and active in building opportunities in **communities.

Program Name *(GEAP, YLP, ECIP, DA, etc.)*	National Performance Indicator (NPI)	Service Domain	Initiative Level *(Individual, Family, Community)*	Annual Target (#) *(Target enrollment for the PY. Reference approved logic model.)*	Projected Achievement (#) *(Expected results for the PY. Reference approved logic model.)*	Achieved (#) *(Number achieved.)*	Enrolled (#) *(Number enrolled, but still progressing toward outcome.)*
Employment	*FNPI 1b. The number of adults who obtained employment (up to a living wage).*	*Employment*	*Individual*	*5*	*3*	*1*	*2*

New!!! Appendix E

Agency Name:_____

MORTGAGE ASSISTANCE AFFIDAVIT

Let it be known that I, _____, am the mortgage holder for (Mortgagee), _____

_____ residing at _____.

I have not received a payment since _____ causing the homeowner to be _____ month(s) delinquent. I consider the homeowner's delinquency serious and require immediate attention.

Total Monthly Mortgage Payment $ _____ Total Amount due to-date $_____

Mortgage Payment Insurance Amount Due	$ _____	
Mortgage Payment Taxes Amount Due	$ _____	
Mortgage Payment Other Amount Due	$ _____	Specify_____
Total Mortgage Payment Due	$ _____	
Total Due:	**$ _____**	

Total Amount Paid by Agency toward delinquency $ _____

Total Amount Paid by Customer toward delinquency $ _____

I understand that any misrepresentation of information on this form will result in an investigation and possibly prosecution of the parties involved.

_____ _____
Mortgage Holder Representative Date

_____ _____ _____
Mortgage Holder Address City, State, Zip Code Telephone Number

_____ _____
Attest Date

_____ _____
Homeowner's Signature Date

_____ _____
Agency Representative Date

LIHEAP

Low-Income Home Energy Assistance Program

The Low-Income Home Energy Assistance Program (LIHEAP), administered by the states, assists low-income households, particularly those with the lowest incomes that pay a high proportion of household income for home energy, primarily in meeting their immediate home energy needs.

Congress established the formula for distributing funds based primarily on each State's weather, fuel prices, and low-income population. Home energy is defined as a source of heating or cooling in residential dwellings. Grantees (states) can use funds for heating and/or cooling costs as well as up to 15% of their funding for weatherization assistance.

LIHEAP defines eligible household members as any individual who is a U.S. citizen or "qualified alien". A "qualified alien is defined at 8 U.S.C. § 1641(b). Members of the household must meet the eligibility requirements specified in Section 2605(b)(2) of the Low-Income Home Energy Assistance Act (42 U.S.C. § 8624(b)(2)). According to the LIHEAP Act of 1981, the term **"household" means any individual or group of individuals who are living together as one economic unit for whom residential energy is customarily purchased in common or who make undesignated payments for energy in the form of rent.**

The Federal income eligibility range is based on a household's income and must not exceed 150 percent of the federal poverty level (FPL). Grantees (states) must provide crisis assistance. States have the option to provide home heating/cooling, weatherization and/or energy-related minor home repairs.

2020 LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM CFDA 93.568
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PROGRAM OVERVIEW

In its 1994 reauthorization of the LIHEAP program (Public Law 103-252, signed May 18, 1994), Congress put additional emphasis on awarding benefits to those who needed them most by defining the purpose of LIHEAP as, in part, to "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."

Further, Section 2605(b)(5) was changed and now requires States to "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," (emphasis added).

South Carolina's LIHEAP Program is designed to help the state's low-income households pay the price of home energy, defined as residential heating and cooling, and to increase energy self-sufficiency; thereby reducing the vulnerability resulting from energy needs. The program is also designed to intervene in energy-related crisis situations (42 U.S.C. 8623(c) and 8624(b)(1)) and to conduct outreach (42 U.S.C. 8624(b)(1)). The program also provides services to encourage and enable households to reduce home energy needs and consequently eliminating the need for energy assistance including needs assessments, energy and income counseling and assistance with energy vendors (42 U.S.C. 8624(b)(16)). Payments are made directly to vendors and credited to the applicant's bill.

Grant Award and Disbursements

Agencies will receive the grant award(s) based upon OEO's receipt of the federal notice of award(s), the timely completion, receipt and final approval of the agency LIHEAP Community Action Plan and Application Budget by OEO. Eligible entities (CAAs) must adhere to grant agreements/contracts; enforce vendor agreements; and maintain proper record keeping and accounting.

LIHEAP PLANNING & REPORTING

LIHEAP and Project Share Financial Status Reports (FSRs), **Household Reports and/or Assurance 16 Program Status Reports** are due to the Office of Economic Opportunity (OEO) on the 15th of the month following the reporting month. All reports must be submitted in a timely manner; timeliness will be reported on risk assessments. **Note: Quarterly LIHEAP Program Status Reports (PSRs) are no longer required.**

LIHEAP Program Year Closeout

The LIHEAP Program should be closed out no later than February 15th (date subject to change). Note: **The LIHEAP Annual Household Pre and Final Closeout Reports are no longer required.**

Logic Model Targeting & Projections

A logic model (also known as a logical framework, theory of change, or program matrix) is a tool used by funders, managers, and evaluators of programs to evaluate the effectiveness of a program. They can also be used during planning and implementation. managers, and evaluators of programs to evaluate the effectiveness of a program. They can also be used during planning and implementation.

The GPRA legislation (Government Performance and Results Act of 1993/ Modernization Act of 2010) refers to "**performance plans**" and "**performance goals**," which both relate to the concept of planning for specific results. This references two kinds of targets: the number of people who are expected to be served and the number of people (of those served) who are expected to achieve an outcome. These targets are identified in planning, so they can be assessed in the evaluation phase.

To improve program targeting, OEO allows agencies the

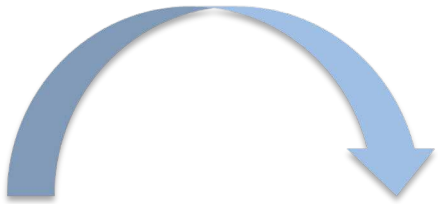
flexibility to adjust program projections as the state receives updated notices of funding. Subgrantees will have a maximum of ten (10) business days following South Carolina's notice of LIHEAP Awards to update services and/or projections on the ROMA logic model. Logic models and targets cannot be altered after the state's final award has been received for the program year. Instead, 20% variances below or exceeding the targeted projections should be explained in the annual report *(Ex. Anticipated funding was reduced, therefore, participant enrollment was limited).* Completed logic models (column 5, Actual Results) are due to OEO no later than January 15, 2020.

South Carolina's LIHEAP Program Goals

The goals for LIHEAP are:

1) Expand outreach to previously unserved households;
2) Target energy assistance to eligible households with the highest energy needs and lowest incomes;
3) Increase efficiency of energy usage by applicant households; and
4) Identify resources to broaden the reach of LIHEAP funds.

LIHEAP PROGRAM OPERATION



South Carolina's LIHEAP operates on a calendar year (January 1 – December 31), and provides eligible households benefits in the following categories:

Heating - January 1 – April 30
Cooling - May 1 – September 30
Heating - October 1 – December 31
Year-Round Crisis (ECIP) - January 1 - December 31

Heating and cooling assistance must only be provided during the appropriate season. Natural gas charges accrued during the cooling season is an allowable expense.

INCOME ELIGIBILITY REQUIREMENTS

Application must be made in the designated service area. The Federal Poverty Guidelines must be used as the primary criterion in determining income eligibility. To receive assistance under LIHEAP, an applicant's total household income must not exceed 150% of the poverty level. **The term "household" is defined by the LIHEAP Act of 1981 as any individual or group of individuals who are living together as one economic unit for whom residential energy is customarily purchased in common or who make undesignated payments for energy in the form of rent".** Total household income is based on income at the time of application.

The purpose of the income determination is to establish an individual's eligibility for services in accordance with the statutory definition of poverty level. The goal is to implement program services that will enhance and promote self-sufficiency, and not to penalize low-income persons as they move from poverty to self-sufficiency.

New!!! One-time Income Verification

Income eligibility will be determined once during a program year considering the household's 30-day income at the time of the initial application. If the household meets the income guidelines, the household will be considered eligible for all qualifying grants for the remainder of the program year. If the person/household seeks additional assistance during the same program year, the applicant will only be required to present a current bill and supporting documentation.

Once minimum income eligibility criteria are established, priority is then given to vulnerable households; particularly those with the lowest incomes that pay a higher proportion of household income for home energy, primarily in meeting immediate home energy needs. Vulnerable households include those households with members who are elderly, disabled, children age 5 or younger and households with incomes at or below 100% of the FPL.

Calculating Income

When calculating total household income, include all income (use actual amount; do not round) for the last 30 days (including the date of application), to determine "gross" income. Use gross SSI and SSA benefits.

Pay Frequencies

With the exception of child support, income should be entered in DBA FACSPRO based on the frequency of payroll periods using gross amounts: when an applicant or household member is paid weekly throughout the 30-day period, enter the income as "weekly"; if paid bi-weekly (every two weeks or 14 days) enter income as "bi-weekly; if paid semi-monthly (twice per month) enter as semi-monthly; if monthly (paid once each month) enter as monthly.

When an applicant or member of the household has earned only one paycheck in the 30-day period, enter it based on the frequency of payroll period, also. When calculating the income of **day laborers**, collect all income received within 30 days of the date of application, and calculate income using the monthly pay frequency. SC ROMA (DBA FACSPRO) will provide the calculations to determine eligibility.

When manually calculating income, use actual amounts (do not round amounts). For example, if the amount is $150.50, **enter** $150.50 not $151.00. To determine the accurate 30-day income to be entered into DBA FACSPRO, the calculations are as follows:

- **Weekly:** (((amount1 + amount2 + amount 3 + amount4) /4) * 4.33)
- **Bi-Weekly:** (((amount1 +amount2) /2) * 2.165
- **Semi-Monthly** (amount1 + amount2)
- **Monthly** (monthly income x 12)

How to calculate Child Support

When calculating child support to determine applicant eligibility, add all payments made within 30 days, to include the date of application, and enter the total "gross" amount into DBA using the Monthly pay frequency.

AWARD LETTERS

(Social Security, Supplemental Security Income, VA Benefits, Pensions, etc.)

A current year's award letter may be used to verify income, using the gross amount.

Supplemental Security Income (SSI)

Proof of disability is to be provided from a current or prior year's award letter from the Social Security Administration (SSA), a current year's letter from Vocational Rehabilitation or the Veterans Administration, disability income check, or an official handicapped sticker bearing the appropriate photograph. Disability may be either temporary or permanent. This medical documentation must be attached to the application on file.
"Disabled" describes an individual who has a physical or mental impairment that prohibits one from working at any substantial employment that otherwise s/he would reasonably be able to perform and that will probably continue for an indefinite period of at least 12 months or who has been certified as permanently and totally disabled by a state or federal agency qualified to render that decision. Short-term disability and workman's compensation are also recognized as a form of disability.

If an individual is under the age of 62 and receiving Social Security benefits **under their Social Security Number only**, that individual is disabled.

A spouse or child receiving Social Security benefits is not necessarily disabled. There are three types of social security payments: (1) retirement payments as early as age 62, (2) survivor payments made at any age, and (3) disability payments made to disabled persons under the age of 65. The medical standards for disability are the same for Social Security (SS) as for Supplemental Security Income (SSI) for individuals age 18 or older. There is a separate definition of disability for SSI children under age 18.

Any questions, you may contact your local Social Security office or call 1-800-772-1213. SSA has asked that CAAs contact them at the number or your local SSA office if documents are required to service customers rather than sending customers to their office for documents. "Understanding SSI" is available online at: www.socialsecurity.gov/ and https://www.ssa.gov/ssi/text-understanding-ssi.htm.

How to Calculate Self-employed Individuals

When a self-employed individual is **operating a business outside of the home, use the "net" Profit**. An individual must provide the **entire** 2018 (most recent) signed Federal Tax Form pertaining to the business (e.g. 1040 Schedule C of Profit or Loss or 1040 Schedule C-EZ). For Form 1040 schedule C, use total from line 31(Net Profit), divide it by 12 = monthly income amount. If using form 1040

schedule C-EZ, line #3 should be used. Other IRS forms include Form 1065 Partnership Return of Income (request Tax Schedule K-1 Form 1065 Partner's Share of Income, Deductions, Credits), Form 1120S (request Tax Schedule K-1, Form 1120S). When a self-employed individual is **operating an in-home business**, such as childcare, **use the "gross" income**. An individual must provide **entire** 2018 (most recent) signed Federal Tax Form pertaining to the business.

When only recently self-employed, an individual must provide quarterly or monthly tax statements provided by the South Carolina Department of Revenue. If the self-employed individual does not file his/her taxes quarterly, provide a copy of the business license and Declaration of Zero Income form.

How to calculate quarterly taxes: Divide the most recent quarterly tax amount by 3 = average monthly income amount. Appointment books should not be used to verify income. When an individual's business has been terminated, verification of termination is required (e.g. state certification verifying termination).

Declaration of Zero Income

Persons with Zero (0) income must complete the Declaration of Zero Income form. If the applicant is receiving funds from someone other than a household member to pay their bills, determine the monetary amounts, calculate those amounts and enter the average monthly income total into DBA as "contributions" or "miscellaneous". Items that *could* be captured on the Declaration of Zero Income form include: child support (contributions from a parent or court-ordered), utility check or monetary contributions to the household outside of employment. ***Note: Be sure not to duplicate income.** *

If a youth (under age 18) provides finances to the adult household member for food, shelter or utility expenses, the amount must be included as income to the adult under miscellaneous/cash contributions on the Declaration of Zero Income form.

The Declaration of Zero Income form should be used as a last resort when all efforts have been exhausted to provide enough supporting documentation.

Utility Checks

Utility checks made payable to and **issued directly to the customer** should be calculated as income when determining eligibility since the customer is not required to remit/forward this payment to the utility vendor as payment for services.

Utility checks **issued directly to vendors** monthly on behalf of applicants who reside in subsidized housing are benefits to subsidize the already very low-income status of those households. In these instances, benefits are not to be counted as income toward/on the application.

Serving Families with Foster Children

When serving households with state-placed foster children, the foster child should **not** be included as a member of the household. These children are considered wards of the state. A DSS placement letter is required in the file. Monthly allowances made to foster parent(s) as reimbursement for the cost of caring for the child should not be counted as income. However, separate wages paid to the parent should be included as income, as these funds are considered payment to the temporary caretaker.

CONTRIBUTION/INCOME EXCLUSIONS

Contributions from Nonprofit Organizations

Contributions/donations from non-profits should not be included as income unless the funds are given directly to the customer. Funds paid directly to the vendor on the behalf of the customer should not be counted as income.

COVID-19 Stimulus Check

One-time **COVID-19 Stimulus checks** should not be included as income.

Income Tax Refunds

Tax Refunds should not be included as income (refer to US HHS IM 119.

Income from Minors

Income is not calculated for persons under age 18 (to determine income eligibility); however, if the youth provides finances to the adult household member for household expenses, the amount must be included as income to the adult under miscellaneous/cash contributions. If household members under 18 receive Social Security or Disability income, the gross amount

must be included as income under the payee or custodial adult's name living in the household.

Please note **the current DSS printout may not be used to verify members of the household, or earned income**; however, it may be used to verify utility check, child support and TANF/FI amounts if listed on the printout.

Student Loans

Student loan refunds should be included as income only if funds are used to help sustain the household.

PROGRAM ELIGIBILITY

After an applicant has been determined to be income eligible, program eligibility must be established in accordance with the State Plan, the Subgrantee's approved LIHEAP Community Action Plan and/or Federal and State laws, policies and procedures.

Each customer file must contain current, accurate and legible documents to include: the current, completed, signed application reflecting FPL and all household members, income proof for all household members 18+ years old, current identification and photo, Social Security card for each household member, proof of military/veteran status when applicable, proof of disability status when applicable, current energy bill, income screens, unallowable cost calculations, vouchers, check numbers, energy burden calculations for DA, proof of emergency for ECIP, and all other pertinent information/documents.

The Executive Director must approve all agency employee, board member and employees of other CAA's applications for assistance by signing and dating the application BEFORE payment is rendered. Agency staff should not prepare applications for their family member(s).

Applicant must provide a copy of his/her current official (government or state-issued) pictured identification such as State (SC) Identification Card, SC Driver's License, Military ID, Employment ID, Passport, Voter Registration Card bearing photo. Eligible residents may obtain a SC Identification Card from the SC Department of Motor Vehicles.

If an elderly applicant (age 75+) does not have a driver's license or a state-issued ID card, an expired ID with a clarifying statement, or a picture of the applicant and a copy of the applicant's birth certificate may suffice. If an elderly applicant does not have a birth certificate, a letter from the Department of Health and Environment Control (DHEC) stating that the client does not have a birth certificate on file is appropriate.

Applicant and household members who benefit from the LIHEAP service must be U.S. citizens or provide proof of legal residency.

Proof of U.S. Citizenship/Legal Residency

By law, States are to ensure that Federal provisions related to providing services to qualified individuals are in full compliance. Therefore, a household including eligible members cannot be denied service. If the only legal household member is a child, the legal household member(s) is still considered eligible. Continue to list the applicant as an "Illegal Alien" when applicable, and serve the household based on the Prorated benefit (refer to DA and ECIP).

Documents to verify qualified alien status include such as the I-94s for refugees, asylum determination letter, LPR status (green card – most recent version has expiration date), alien registration card, and social security card. The Bureau of Immigration and Naturalization and/or the Social Security Administration may be used to validate documentation.

Proof of Active Military or Veteran Status

Veteran's Administration

- Veteran Identification Card (VIC)
- Veteran Health Identification Card (VHIC)
- Veteran Income with status stated
- Veteran retirement or disability income

Department of Defense

- Common Access Card
- Uniformed Services Identification Card
- State Driver's License and ID with veteran's designation
- State vehicle registration with veteran's designation
- DD214 form or DD256 certificate with honorable discharge or less than honorable

Note: Dishonorably discharged veterans are not eligible for the additional Veteran Direct Assistance benefit.

All information provided for income and program eligibility must be consistent. If a client's address listed on the application does not match the address listed on

their driver's license/ID, their address may be changed and printed online at: https://www.scdmvonline.com/dmvpublic/trans/AddrChange.aspx. If the online process cannot be accomplished, the customer is responsible for providing the current driver's license/ID.

Frequency of LIHEAP Service(s)

Customers may receive LIHEAP financial assistance **a maximum of two times** during the program year to include Direct Assistance (DA) and/or Emergency Crisis Intervention Assistance (ECIP). SCE&G and Duke Project Share assistance may be provided as a separate service once during the program year. Therefore, two LIHEAP services and one Project Share service may be provided to an eligible household. **Not more than one LIHEAP service, to include Project Share, may be provided within 30-days.**

Vendor Agreements

A Vendor Agreement must be completed by all new vendors and a current Agreement must be on file for all prior vendors. Vendor Agreements must be available for review upon request during each monitoring visit.

- Each vendor must complete a Vendor Agreement and a W-9 to be certified by the Subgrantee. Once completed and on file, the Vendor will only need to complete a new Agreement and a new W-9 if the proprietor's name, address or FEIN changes.

- The vendor is to credit the customer's account in a timely manner and return the energy voucher(s)/transmittal/invoice to the Subgrantee for payment. Vendor Agreements should contain language that prohibits the paying of water, sewer, products and services, meter tampering charges, security systems and returned check fees.

- Within 30 days of the date of the receipt of the energy voucher(s)/transmittal/invoice, payment of the exact dollar amount will be made to the vendor. During program monitoring, OEO will review proof of timely payments.

- **Payments are not to be rounded. When a vendor has not received payment within thirty (30) days following the date of receipt of the bill submission, the vendor should immediately contact the Subgrantee and report the delay in payment.**

- Subgrantees should submit a 1099 IRS Form to record vendor payments more than $600* to non-incorporated vendors.

- Vendors are to accept payments on behalf of eligible households for:

  (1) Electricity and/or natural gas

  (2) Firewood and for ancillary charges for delivery, stacking and splitting of wood during delivery

  (3) Propane, fuel oil, coal or other approved fuels and for ancillary charges for delivery, including cost of parts and labor incurred in attaching the fuel tank to the household's residence, as well as for tank rental or purchase cost.

LIHEAP CLIENT ASSISTANCE PAYMENTS

Applicant must reside at the address stated on the utility bill; however, when the bill is in the name of a household member other than the applicant, the applicant must provide proof s/he resides at that address, relationship to applicant (if applicable) and approval to access that account. Husband and wife living in the same household do not need approval to access the account.

Bills will no longer be accepted if the person whose name appeared on the bill has been deceased longer than 12 months (proof needed), bill is in a minor child's name, or bill is in non-household adult's name.

When the bill is in the name of the landlord, the landlord must provide a statement indicating that the applicant is permitted to access that account, to include making payment on the account. The file must include this documentation. Customer must provide a current Lease Agreement indicating the account is in the landlord's name, but the bill is the responsibility of the tenant.

If the customer has either a zero balance (the total amount due is $0) or credit (more than $5) on their account, LIHEAP assistance **cannot** be provided.

GEAP funds cannot be used to pay utility bills in 2020 unless the total allocations for **LIHEAP and Project Share** funds have been exhausted for the program year, by county. This must be proven during monitoring or funds will have to be reimbursed.

Each check and/or voucher must be made payable only to the vendor from whom the applicant proposes to obtain services.

The voucher/check used for direct client (monetary) assistance shall be documented as follows:

- CAA's (Subgrantee) name as payer;
- Vendor's name as payee; and
- Eligible applicant's name as recipient.

Payment should indicate "Credit only to home energy expense." If applicable, this policy **must** be added in the Vendor Agreement. Agencies should not contract with vendors that cannot meet this requirement.

Primary Home Energy Source

The USDHHS Division of Energy Assistance has stated that agencies are permitted to pay home energy bills when there are two sources of energy required to heat and cool a home. Example: A home heated with natural gas requires electricity to heat the home. Both are to be paid as one allowable LIHEAP service (even if each service is provided by different vendors) and should be logged as primary and secondary energy sources in SC ROMA (DBA FACSPRO). The energy burden must be calculated using the current energy amount, excluding all unallowable and non-energy charges, of the electric bill amount.

LIHEAP ALLOWABLE AND UNALLOWABLE CHARGES

LIHEAP funds ***may be*** used to pay:

- Electric/Fuel deposits
- Fuel Tank Installations
- Late fees
- Mandatory Roundup fees
- Regulated Renewable Energy Charge
- HAZMAT fees
- Delivery charges/Expedited Delivery Charges
- Franchise Fees
- Natural Gas Charges regardless of season
- Mandatory and/or regulated fees required for service
- Emergencies approved by OEO

LIHEAP funds ***may not*** be used to pay:

- Sewer and sanitation products and services
- Outside light/pole fees
- Unregulated/voluntary fees
- Outdoor and subdivision lights (light/wood poles)
- City/county fines for late garbage bin pickup
- Meter tampering charges, maintenance fees, security systems and returned check fees.
- **LIHEAP funds may not be used to pay Duke customer deposits or any vendor unwilling to credit LIHEAP funds to cooling and heating costs, only.**

Utility bill round-up fees

The U.S. Department of Health and Human Services (USDHHS) stated (November 21, 2006) that LIHEAP funds may not be used to pay customer contributions that are voluntarily donated for round-up programs; those fees must be deducted from the client's utility bill and excluded from the LIHEAP service amount (Refer to LIHEAP Program Assistance Memorandum L 17-06). **However, when a utility company charges a mandatory round-up fee on all customer utility bills, USDHHS has stated that the charge has become a part of the household's utility bill and has to be paid in order for the household to maintain service. Therefore, in these instances' agencies can pay round-up fees.**

If LIHEAP funds are used by vendors in ways that are different than what is described in the LIHEAP Statute and State Plan, this may constitute an improper use of funds. *(Reference LIHEAP IM 2010-13 Use of LIHEAP Funds Coordinated with Vendor Assistance Programs).*

New!!! UNALLOWABLE CHARGE DEDUCTIONS

To alleviate hardships and streamline service delivery, CAAs may deduct unallowable fees from the customer's/household's maximum benefit.

It is the responsibility of the agency to determine if the benefit will alleviate the household's emergency. If the customer's benefit will not restore/maintain the household's energy, the customer will be required to pay the necessary amount or LIHEAP service cannot be provided.

Deferred Payment Plan (DPP)

A Deferred Payment Plan (DPP) is a formal arrangement with the utility vendor and the customer, allowing the customer to pay an outstanding bill in installments. While outstanding debt is paid in installments, the customer will still accrue current utility charges. Therefore, the

customer is responsible for paying old and current debt until the outstanding debt is eliminated.

To assist a LIHEAP customer with an emergency DPP, the agency must have detailed itemized bills for each month to determine that all charges included in the DPP are allowable and/or occurred during the current program year. Without detailed bills the agency can only pay current allowable energy charges, and the customer will be responsible for the remainder of the bill or to provide an agreement between the customer and vendor to satisfy the balance (proof required). The customer *must* satisfy their portion of the bill prior to the agency's commitment.

To assist a LIHEAP customer with a Nonemergency DPP, carryout the necessary application award process for a DA benefit.

Equalized Payment Plan (EPP)

The EPP allows customers to pay their household energy usage in 11 equal payments and settle in the 12th month. To calculate customers monthly payment, the energy vendor calculates the customer's total energy charges from the previous year and divides that by 11 to give the customer a more predictable bill.
At the end of the 12-month period, the total amount of energy used and paid for is assessed. Any over- or under-charge is included in the customer's 12th month bill and a new monthly payment is calculated. If the customer paid more electricity than they used over the first 11 months, the vendor will credit the customer's account for the difference in the 12th settle-up month. If more electricity was used than paid for, the customer will be billed for the difference.

Eligible customers may qualify for either nonemergency (DA) or emergency (ECIP) LIHEAP service. **IF the vendor provides the customer a cash reimbursement for overpayment in the 12th month instead of crediting the customer's account, the agency may only provide the customer an ECIP service, paying only the actual energy used each month.**

To assist a LIHEAP customer with an emergency EPP, the agency must have detailed itemized bills for each month. The customer *must* satisfy their portion of the bill prior to the agency's commitment.

To assist a LIHEAP customer with a Nonemergency EPP, carryout the necessary application award process for a DA benefit.

Automatic Draft Bank Accounts

Customers that have elected to have their utility charges automatically drafted from their personal account will not be reimbursed. Additionally, OEO recommends agencies not suggest customers stop automatic drafts, as utility payments are the responsibility of the customer and LIHEAP is a needs-based grant. Instead, offer energy counseling or assistance with budgeting.

2020 LIHEAP FEDERAL POVERTY INCOME GUIDELINES

(AMOUNTS SHOWN ARE COMPUTED AT 150% OF POVERTY GUIDELINES)

FAMILY SIZE	150% MONTHLY POVERTY GUIDELINE	150% ANNUAL POVERTY GUIDELINE
1	$1,595.00	$19,140.00
2	$2,155.00	$25,860.00
3	$2,715.00	$32,580.00
4	$3,275.00	$39,300.00
5	$3,835.00	$46,020.00
6	$4,395.00	$52,740.00
7	$4,955.00	$59,460.00
8	$5,515.00	$66,180.00
For each additional person, add	$560.00	$6,720.00

Note: Federal Poverty Income Guidelines are in effect as of January 23, 2020. The 2020 HHS poverty guidelines will be updated once published in the Federal Register and can be referenced at https://aspe.hhs.gov/poverty-guidelines.

DIRECT ASSISTANCE (DA)

Direct Assistance is designed to provide financial assistance to help avert, prevent, deter and avoid utility crisis. DA funds are reserved for the provision of financial utility services that are provided before the initial onset of an emergency. Direct Assistance may be provided if the customer is not in crisis. Note: Arrearages may go beyond the current month and one month past due.

Because Direct Assistance is not an emergency program, a balance is not required to be satisfied on the customer's account, however, all unallowable charges MUST be paid prior to service or deducted from the maximum award benefit. A letter from the vendor will suffice as proof that the merchant will work with the customer on the outstanding amount of unallowable charges.

If the customer has either a zero balance (the total amount due is $0) or credit (more than $5) on their account, LIHEAP assistance **cannot** be provided.

Maximum heating assistance - $750

Maximum cooling assistance - $675

May be used to pay home heating and/or cooling costs (**excluding** water, sewer, sanitation, products and services, outdoor and subdivision lights, light/wood poles, city/county fines for late garbage bin pickup, voluntary round-up fees, meter tampering charges, security systems and **returned check fees**).

Applicant must provide copy or original energy bill (must have been issued within the last 30-days) to verify the account number. Bill must detail all past due and current charges. When street lights and other non-allowable items appear on a bill, those utility vendors must be required to *"Credit only to home energy expense"* to ensure compliance with LIHEAP requirements, or the agency is to pay only the energy expense up to the maximum allowable base the customer is eligible under DA (Refer to Specialized Utility Payment Plans, page 19). DA funds may be used to pay the current energy amount or the current and one month past due (bills must be for consecutive months) amounts.

Direct Assistance cannot be used to pay bills that are in cut-off/disconnection status within five (5) days of the application date. However, Direct Assistance funds may be used to pay for emergency services which will gain a larger financial benefit from a DA service when compared to the allowable ECIP benefit ONLY for a household that includes an elderly and/or disabled individual. **NOTE: This rule only applies to elderly and/or disabled households.**

LIHEAP funds may not be used to pay Duke customer deposits or any vendor unwilling to credit LIHEAP funds to cooling and heating costs, only.

Vulnerable households

(1) Elderly - Individuals age 60 years or older.

(2) Disabled – Individuals must provide proof of disability. Proof of disability is to be provided from a current year's award letter or SSI report from the Social Security Administration (SSA) verifying disability, a current year's letter from Vocational Rehabilitation or the Veterans Administration, Disability Income Check, or an official handicapped sticker bearing the appropriate photograph. Disability may be either temporary or permanent. This medical documentation must be attached to the application on file.

(3) Income is 100% - Refer to current Federal Poverty Income Guidelines. Total household income for the last 30 days, including the date of application must be at or below the 100 FPG.

(4) Household with Children Age 5< - One or more children living in household age 5 or younger.

(5) Energy Burden – An Energy Burden must be calculated using only the current month's home energy cost (ex. kWh or Therms). To determine the Energy Burden for electric households, multiply total monthly household income by 20% (.20) = PRODUCT.

Because fuel expands, tanks and cylinders are never filled to the maximum size of the tank. Instead, tanks are only filled to about 80 to 85 percent of their capacity. **To determine the Energy Burden for fuel customers, multiply the cost to fill the customer's tank by 80%.** If the current energy bill is higher than the PRODUCT, then an energy burden has been demonstrated. The current home energy cost should exclude all non-utility and unallowable charges.

Example: Total current utility bill is $300, non-utility charges total $50 (round-up fees, franchise fees, service charges and non-regulated charges). $300-$50 = $250. The total allowable energy amount is $250.

If a household receives both electric and gas charges on the same bill, combine the total amount of home energy used (kWh and Therms) to determine the current Energy Burden.

(6) Fuel – According to the LIHEAP Performance Measures, fuel is defined as Natural Gas, Fuel Oil/Kerosene or Propane (LPG – liquefied petroleum gas). For an additional benefit, the household must heat with one of the fuels mentioned above. Proof of fuel service must be in the file. **Note: Natural Gas customers are eligible for the Fuel Benefit during the heating season, only.**

Kerosene and propane vendors must verify the tank is attached/connected to the structure. Portable kerosene heaters cannot be provided with kerosene assistance and should not be awarded a fuel benefit.

(7) Veterans - Individuals must provide proof of veteran status (refer to page 13). Documentation must be in the customer's file. Note: Dishonorably discharged veterans are not eligible for the additional Veteran Direct Assistance benefit.

Serving Direct Assistance to households with Undocumented Immigrants

Complete the application listing the Illegal Alien as a member of the household (capture any income if applicable on the Declaration of Zero Income form). When determining the itemized household benefits (i.e. – Child age 5 or under, Energy Burden, Elderly, Disabled, Income under 100%), only consider eligible household members (exclude Undocumented Immigrants). After the household's benefit has been determined, apply the Direct Assistance Prorated Calculation to determine the benefit per person. Only apply the prorated benefit amount to each eligible household member.

Total DA Benefit ÷ # of HH Members = Prorated Benefit
(including Aliens)

Fuel Customers and Pre-Pay Accounts

Income-eligible applicants with a zero balance on an existing utility account may still have a documented need. Files should contain clear justification for assisting these.

Direct Assistance may be used to pay "pre-payment" accounts and deposits with Electric Cooperatives, only. Pre-pay customers do not qualify for an energy burden since no current bill will be due, (this does not apply to propane and fuel oil). Note the SC Code below:

SECTION 33-49-255. Restrictions on interruption of electric service to residential customer for nonpayment of bill; exceptions:

(A) Except as provided in subsection (B) of this section, an electric cooperative must not interrupt electric service to any residential customer for nonpayment of a bill until twenty-five days have elapsed from the date of billing.

(B) An electric cooperative may interrupt electric service to a residential customer who has voluntarily enrolled in a prepay program if the prepay program allows the customer to monitor his consumption of electricity and his account balance daily and the balance of that customer's prepay account is zero, provided that the following conditions are met:

(1) at the time the residential customer enrolls in the prepay program, the residential customer is informed and agrees that his electric service may be interrupted when the balance of his prepay account reaches zero;

(2) electric service must not be interrupted before 10:00 a.m. on the next business day following an attempt by the electric cooperative to give the customer notice of the impending interruption by telephone or electronically; and (3) service must not be interrupted except during hours when the electric cooperative is accepting cash payments. For purposes of this subsection, a business day is any day in which the electric cooperative, or an agent, is accepting cash payments.

(C) Nothing contained herein shall be construed to relieve an electric cooperative of the requirements of Act 313 of 2006.

When appropriate, agencies are advised to help customers create new accounts with a utility vendor for a permanent situation by following LIHEAP rules.

Nonelectric Deliveries

Kerosene, wood, coal, and propane applicants' DA benefits must be calculated in the same manner as DA benefits calculated for natural gas and electricity customers, using all allowable benefit options for vulnerable households. In these instances, an Energy Burden may be applicable using the total energy cost, excluding unallowable and non-utility charges, identified on the bill/statement (must be a current bill) from the vendor for that service.

For home deliveries, vendors must provide a Non-Electric Fuel Affidavit provided by the agency, delivery ticket for the file documenting fuel type, number of gallons or cords of wood, cost per gallon, total delivery cost, delivery date, vendor name and address. Agencies must approve the service prior to the delivery (agency *may not* pay for services if the customer initiates the order for fuel/wood without CAA approval) if LIHEAP funds are to be used. The purpose of pre-approval is to ensure that customers are not placing orders assuming agency payments and avoid improperly shared information between customers and vendors. This *does not* apply to customers who are approved by the vendor for automatic delivery.

To determine the current amount on a new propane/fuel oil bill, use the cost listed on the vendor's bill/invoice that is needed to fill the tank.

All kerosene, propane, wood and coal customers are to provide a statement from the vendor for the file that reflects the total number of gallons/cords to be purchased, fuel type, cost per gallon, vendor name and address. Kerosene and propane vendors must verify the tank is attached/connected to the structure. Portable kerosene heaters cannot be provided with kerosene assistance.

DA BENEFIT LEVELS

Minimum Benefit Level (Heating or Cooling) ..….$300

Additional benefits if:

(1)Elderly…….……$75

(2)Disabled…….....$50

(3)Total Household Income is =100% or < the FPL...$75

(4)Applicant with children age 5 <……..…$50

(5)Energy Burden (20% of total HH income)…….$75

(6)Fuel *(not provided during cooling season)*….....…$75

(7)Veterans…….……..…$50

Maximum Heating Assistance……..$750

Maximum Cooling Assistance……..$675

SLAPP & Electric Cities

The Selected LIHEAP Assistance Payment Plan (SLAPP) is an incremental payment plan for customer's whose monthly energy bill includes charges that cannot be paid using LIHEAP or Project Share funds (ex. water, sanitation, outside lights, etc.).

The household's total DA benefit will be issued to the customer in increments, covering only the allowable charges for each month until the full benefit is exhausted. **If the balance of a SLAPP is less than $25, the agency may apply the remaining amount to the customer's final award**.

Example:

Customer's DA Award is $300.

Bill	Energy Charge	Agency Pays	Balance
January	$125	$125	$175
February	$160	$175	$0

Note: The agency provided the full balance in February because the remaining balance was $15 (under $25).

Vendors may not transfer, or cash out benefits to recipients; this must be addressed in your Vendor's Agreement. If a customer relocates and is no longer a customer of the vendor that was provided a benefit for that customer/household, all unexpended balances must be returned to the agency by the end of the program year. Vendor Agreements must indicate the vendor's understanding/acceptance of this policy.

South Carolina has a statewide agreement with Dominion Energy (former SCE&G), therefore, SLAPP requirements do not apply. Additionally, if vendors agree to apply all LIHEAP funds to the heating and cooling portions of the bill (in writing), incremental payments are not required.

EMERGENCY CRISIS INTERVENTION (ECIP)

Emergency Defined: A sudden, urgent, unexpected occurrence or occasion requiring immediate action; a state, especially of need for help or relief, created by some unexpected event; an unforeseen combination of circumstances or the resulting state that calls for immediate action; or an unexpected situation that poses an immediate risk that requires urgent intervention. An emergency is never planned.

Maximum benefit $1,000 (subject to change) - With a documented emergency, an eligible household may receive ECIP assistance; including payment for home energy expense, the purchase of an air conditioner, window heat pump room a/c unit and/or heater(s) such as The Heat Surge (portable kerosene and space heaters are not allowable); to be resolved not later than 48 hours for a general emergency and not later than 18 hours for a life-threatening situation.

New!!! **18-Hour Life Threatening Energy Crisis** –an emergency requiring immediate action to prevent the loss or impairment of life/health due to a medical condition if the household's energy service is interrupted.

New!!! **48-Hour Energy Crisis**– An energy crisis is when a low-income household is facing imminent disconnection and/or needs restoration of their home heating/cooling source. An energy crisis may also be the result of weather or energy-related emergencies.

Customer Bills

Applicant must provide most recent copy or original of the energy bill (must have been issued within the last 30-days and may include past due amounts) to verify the account number and detail all actual charges. According to the South Carolina Office of Regulatory Staff ("ORS") and Public Service Commission of South Carolina ("PSC"), customers have the right to written notice from their electrical utility before electric service is disconnected for nonpayment. Therefore, a final notice/termination notice is not acceptable without the itemized bill.

New!!! It is OEO's intent to offer customers the greatest benefit to eliminate a household's immediate emergency. Therefore, there are no restrictions on how far back an agency can pay toward the customer's debt, regardless of when the debt was accrued, if expenses are allowable and in accordance with the grant/approved program. **The agency must still determine if the LIHEAP benefit will eliminate debt and secure the household's energy for 30 days forward.** Detailed bills must be provided for consecutive months to ensure unallowable charges are not

paid. However, Fuel and Nonelectric energy may only be purchased during the heating season.

Example: When serving a customer with a 2020 bill, allowable charges accrued at any time in 2019 or prior, ***may*** be paid up to the maximum dollar amount.

If the situation at the time of application is that the customer made additional arrangements with the vendor and the due date of the original final notice has passed, do not postpone the appointment. Document that the customer has received a final notice and copy the bill reflecting the original disconnect date.

In a case where a customer has a bill higher than the maximum amount allowed, the difference must be satisfied prior to the service or an agreement between the vendor and customer must be met before a service is provided to the client (Example: A client has a bill for $1,200.00. The client must pay $200.00 or there must be an agreement between the client and vendor to satisfy the remaining $200.00).

If the entire bill is not paid, the remaining balance must be satisfied before the agency remits a payment. The file must contain a paid receipt or vendor agreement for the balance to validate how the remaining balance was paid or will be satisfied, to include source (by client or through area referral).

If the customer has either a zero balance (the total amount due is $0) or credit (more than $5) on their account, a crisis LIHEAP service **may not** be provided.

Updated!!! Transfer Accounts

Allowable transfer amounts from a previous address *may* be paid if the customer can provide documentation that he/she lived at the former address along with an itemized bill(s), regardless of a lapse in service. **The agency must still determine if the LIHEAP benefit will eliminate debt and secure the household's energy for 30 days forward.**

Updated!!! Closed Accounts & Outstanding Debt

If a client has a closed account, **the agency must determine if the LIHEAP award will secure a deposit and restore the household's heating/cooling energy for 30 days forward before an award can be provided.** There are no restrictions on how far back an agency can pay toward the customer's debt, regardless of when the debt was accrued

Emergency Services for Nonelectric/Fuel Vendors

Non-electric energy/fuel may only be purchased during the heating season. For home deliveries, vendors must provide a delivery ticket for the file documenting date and amount of last delivery, fuel type, number of gallons or cords of wood, cost per gallon, total delivery cost, delivery date, vendor name and address.

All kerosene and propane customers must have vented systems that are connected to the dwelling and are to provide a statement from the vendor for the file that reflects the total number of gallons to be purchased, fuel type, cost per gallon, vendor name and address.

Serving ECIP to households with Undocumented Immigrants

Complete the application listing the Illegal Alien as a member of the household (capture any income if applicable on the Declaration of Zero Income form). Determine the household's allowable charges according to the current and past due bill(s). After the household's maximum allowable charges have been determined, apply the prorated calculation to determine the benefit per person. Only apply the prorated benefit amount to each eligible household member.

Total Allowable Charges ÷ # of HH Members = Prorated Benefit
(including Aliens)

eliminate the household's utility crisis. **If the entire bill is not paid, the remaining balance must be satisfied before the agency remits a payment.** The file must contain a paid receipt or vendor agreement for the balance to validate how the remaining balance was paid or will be satisfied, to include source (by client or through area referral).

New!!! PREPAID ACCOUNTS

Prepaid customers may be eligible to receive a LIHEAP crisis award (ECIP) to restore service or to secure the household for 30-days forward. A past due amount (varies by vendor) and the amount to secure the household for 30-days forward may be provided up to the $1,000 ECIP maximum.

The customer's file must include a daily usage rate/charge to justify the award. It will be the responsibility of the agency to calculate the daily usage rate/charge by 30-days to determine the ECIP award. Other support documentation may include the customer's account

history and account balance.

EXAMPLES OF EMERGENCIES

(This list is not inclusive of all allowable emergencies)

Note: Proof of emergency is *always required* in each customer/household file. Emergency must have occurred within 30 days of the application unless otherwise specified below.

NOTE: Being disabled, elderly or on a fixed income does not justify an emergency.

- A termination or final notice alone does not constitute an emergency; however, the reason the household is unable to pay this utility bill must be explained in the notes section of dba. **A termination notice with a scheduled disconnection date within five (5) days of the application date may be used as proof of emergency for all LIHEAP eligible customers and this case must always be treated as an ECIP service**.

- ***New!!!*** **Suspended Disconnects/Final Notices** - Due to the suspension of final/disconnect notices, OEO will consider bills with arrearages that exceed two (2) months an emergency.

- Direct Assistance funds may be used to pay for emergency services **for elderly and/or disabled households, only**, if the DA benefit will provide a larger financial benefit when compared to the allowable ECIP benefit.

- **Empty fuel tank or low fuel tank** (less than 1/4 during *extreme* winter weather-related temperatures (below 50º). If customer misrepresents the facts about the amount of fuel in tank (customer says tank is empty, but tank is more than ¼ empty), customer may be disqualified for services for 1-2 years.

- ***Updated!!!*** **Extreme weather-related temperature at the time of application** (below 50º during heating season and above 90º during cooling season. Heat index or wind chill may be considered.) **Documentation of the temperature at the time of application *with* a final notice must be used as proof of the customer's emergency.**

- **Burn-out, tornado, hurricane, earthquakes, ice storm or flood** (energy assistance needed to establish home energy in new or temporary residence).

- **Extreme increase in a bill** (more than 40%). (Compare the previous month's energy charge to the current energy amount. Include documentation in the file.)

- **No home energy** (heating or cooling) at current residence, including disconnected utility (proof that utility has been disconnected required).

- **Disconnection Notice** verifiable by the agency (disconnection notice alone does not verify an emergency.) *Please do not advise customers to wait until their services are disconnected to be served – remember emergencies should never be planned. A termination/disconnection or final notice alone may be used as proof of emergency for households with vulnerable individuals, i.e. elderly, disabled or children 5 years of age or younger, only.*

- **Job loss** (layoff, reduction in force), proven medical emergency that caused proven financial hardship, proven reduction in income (more than 40%) or death of primary income provider/wage earner (within 90 days of application).

- **Long-term unemployment** resulting from proven layoff or reduction in force (over 180 days but not more than 365 days) or exhaustion of UI benefits (within past 90 days) if customer is consistently seeking employment (proof required).

- **Exhaustion of personal savings** (within past 60 days). Proof, such as 2-month bank statement, is required.

- ***Updated!!!*** **Income-ratio-to-bill** for very low fixed income households **(less than 100% FPL)**:

Current bill allowable amount ÷ total monthly gross income = percentage (ex. $308.20 (bill) ÷ $694.00 (total/combined household gross income) = 45%). This may be used as an emergency if the percentage is more than 40%. Calculation must be in file for monitoring purposes.

- **Emergency vehicle repairs** (for employed persons only) within 90 days of application (official receipt required). Repair amount must be comparable to energy amount needed.

- **Emergency repairs to home** within 90 days of application (official receipt required). Repair amount must be comparable to energy amount needed.

- **Energy burden** Calculation: Monthly Income x 20% = _____ Current Energy Bill$_____.
Current month energy charge (only heating and cooling portion of bill) must exceed 20% calculation.

EMERGENCY WINDOW UNITS

Maximum Cost - $700/unit or $1,400 for purchase and installation of two (2) units per household.

Emergency window units may be provided up to the allowable maximum of $700 per unit. A window unit may be purchased and installed as an emergency service to ensure the safety of members in eligible households during extreme weather.

The agency is to coordinate the proper procurement, installation and client education on the usage of the unit. Client education should include the overview of product warranties, changing filters, usage of proper electrical outlets and winter storage. Agencies can coordinate with a vendor or Weatherization Program for installation. If unable to work through either, a licensed and insured contractor is required for proper installation(s) and a contractor's agreement is required. Each agency will be monitored on this component. **Client and installer are to sign off on the installation and a copy of the invoice is to be placed in the client's file.** Refer OEO Fiscal Guidance and Procedural Manual, Procurement Policy.

Maximum Size – 15,000 BTUs; must have the Energy Star certification. Installation by a reputable vendor is required to assure proper setup and service. Warranty and installation fees may be paid with LIHEAP funds.

Updated!!! EMERGENCY INTERVENTION SERVICES

IMPORTANT: Section 2604(c)(1)(2) of the LIHEAP Statute requires not later than 48 hours after a household applies for energy crisis benefits, the eligible entity (CAA) provide some form of assistance that will resolve the energy crisis if such household is qualified to receive such benefits. Not later than 18- or 48-hours after a household applies for Crisis benefits, the eligible entity (CAA) must provide some form of assistance that will resolve the energy crisis if such household is deemed eligible to receive LIHEAP benefits and is in a life-threatening situation.

LIHEAP ECIP funds may be used to provide temporary shelter or approved heaters/fans as an emergency intervention when a LIHEAP service cannot be provided within 18 or 48 hours for eligible households.

DBA Instructions: Select the "Emergency Intervention Service" program to provide a heater

(one OEO permitted heater at a max. $250), fan (one fan at a max. $100) OR temporary shelter (at a max. of $1,000). ***(For more information contact your agency's System Administrator or the DBA Help Desk).***

Updated!!! EMERGENCY HEATERS

A maximum of two (2) Heat Surge, Infrared Quartz Heater or comparable units may be purchased during the program year for a household reporting no source/safe source of heat in the home (maximum purchase price is **$250 per unit, not to exceed $500 per household.**) **The need must be justified**. To justify the purchase of more than one unit, the household must include more than one person (since the unit is portable). The BTU Output should be approximately 4,500 - 5,000, have adjustable heat settings, safety tip-over and thermal power cut-off, cool touch exterior, be inspected and approved by UL benchmark in safety, and other health and safety features and benefits.

The purchase of portable kerosene heaters or space heaters **is not** allowed due to safety and health issues.

BLANKET/THROW DISTRIBUTION

Agencies may provide elderly income-eligible customers blankets or lap throws during the heating season only, in addition to a DA/ECIP service. Eligibility guidelines should be outlined in a logic model approved by OEO to include requiring the customer's signature in receipt of the blanket/throw. A separate

program MUST be established in DBA FACSPRO to track this service and expense.

Maximum Cost - $25 per blanket/throw up to $100 per household.

At program year-end, the agency must provide an itemized listing by type, unit price and total costs residual materials inventory. **In the subsequent program year, once spending is authorized, the agency should use current year program funds to purchase the inventory from the prior program year funds and ensure the inventory is recorded in the current program period in which the benefit is received. Prior year inventory must be cleared out prior to submission of the final FSR.**

HVAC ASSESSMENTS

(Weatherization Subgrantees only)

HVAC assessment fees are allowable as a preliminary service when qualifying households request HVAC services, **utilizing LWAP funds**. All HVAC assessments should be coordinated with the eligible entity's Weatherization department or contracted with an outside vendor. **$150 Maximum Cost**.

CHIMNEY SWEEP

Chimney sweep service(s) is an allowable emergency (ECIP) health and safety measure using LIHEAP funds.

Maximum Cost - $400/flue or up to $800 for inspection and sweep of up to two (2) chimney flues per household.

LIHEAP WEATHERIZATION (LWAP)

Up to fifteen percent (15%) of LIHEAP funds will be allocated to the 2019 Weatherization Program to supplement the Weatherization Assistance Program funded by the U.S. Department of Energy. LIHEAP WAP funds take on the identity of WAP funds, except for Administration (.5% has been allocated for administration). LIHEAP WAP funds are also used to improve home health and safety. Agencies are required to refer high energy usage households to Weatherization. **There is NO stipulation when referring LIHEAP and Weatherization customers between programs. Weatherization may refer customers to LIHEAP and vice versa.**

LIHEAP OUTREACH ACTIVITIES

Outreach is an important aspect of administering LIHEAP, both at the state and local level. Section 2605(b)(3) of the LIHEAP statutes allows grantees/subgrantees to conduct outreach activities designed to assure eligible households are made aware of LIHEAP assistance. Effective outreach means the most vulnerable households, or those the state has prioritized such as elderly or disabled, are made aware of LIHEAP. Effective outreach can also streamline the process.

LIHEAP Outreach Activities include:

- Written LIHEAP materials such as flyers, poster, bilingual materials, brochures, etc.
- Media announcements. Publish LIHEAP articles in local newspapers or broadcast targeted LIHEAP media announcements.
- Interpretation services. Toll-free phone lines and/or special assistance with language translation and interpretation services for deaf and blind LIHEAP applicants.
- Targeted outreach. Mail early applications to the elderly and disabled. Canvas neighborhoods. Conduct outreach to recipients of similar public assistance programs.
- Reference: https://liheapch.acf.hhs.gov/tables/outreach.htm.

NOTE: LIHEAP Outreach Activities may only be used to promote LIHEAP. Advertisement and outreach **may not** include other agency programs or promotion of the agency. Collective advertisement and outreach will require shared costs between grants/programs. **OEO must approve each agency's LIHEAP Outreach Activities and budget prior to service delivery.**

PROJECT SHARE (PS)

To extend the scope of LIHEAP, if a household's utility vendor participates in Project Share, funds designated to that county may be expended to provide additional energy assistance.

Project Share Reporting

Project Share operates on a state fiscal year beginning July 1st and ending June 30th of the following year. All Project Share client assistance data is to be maintained in DBA FACSPRO and reported monthly on a separate Household report for each vendor.

Project Share Exclusions

Project Share funds may not be used to purchase/install HVACs, window units, heat pumps, air conditioners, heaters, etc. Funds may not be used for repairs or administrative costs, unless instructed by the utility vendor.

CRITERIA:	**Dominion Energy South Carolina** *(former SCE&G)*	**Duke Energy - Fan Relief Program**	**Duke Energy Progress Energy Neighbor Fund**	**Piedmont Natural Gas "Share the Warmth"**
Except for *Duke Energy Fan customers, eligible households may receive Project Share assistance using LIHEAP rules. **A household may be assisted with Project Share funds once during the program year.** Agencies are encouraged to use Project Share Funds when possible to expand the outreach of LIHEAP funds. **LIHEAP Rules: Maximum level household assistance: ECIP $1,000 and Direct Assistance $750.**	LIHEAP & additional Dominion Energy Rules	LIHEAP eligibility rules, age 60+, serve once $50 limit	LIHEAP Eligibility Rules	LIHEAP eligibility rules Heating only
The household must be the energy provider's residential customer. A copy of a current or most recent billing statement verifying the household's residential customer status must be retained with the applicant's file. The applicant's "Home Address" must coincide with the service address on the billing statement.	√	√	√	√
The household must use electricity or natural gas to heat or cool the home. Secondary sources of heating are permitted. The authorized uses are payment of an energy bill to include deposits, reconnection fees, late fees, membership/franchise fees if required to establish service, if the applicant household can present proof that s/he is either a natural gas or electric customer.	Electricity Natural Gas	Electricity Natural Gas	Electricity Natural Gas	Natural Gas
Funds shall not be used for payment of administrative costs. Interest earned from Project Share funds maintained in an interest earning account may be retained.	Administrative caps for operational costs are outlined in the grant agreement. Funds may not be used for salaries.	√	√	√
Funds cannot be used for repairs or purchase of a home heating or cooling device.	No	No	No	No
Funds cannot be used for purchase of fans, air conditioners or heating device.	No	Purchase of fans, only, not to exceed $50.	No	No
Funds should be expended from balances-on-hand for each county.	Households must be a current customer of the vendor.			
Monthly reporting shall be on OEO Project Share FSR. Each report is to be completed and submitted to the OEO no later than the 15th of the month following the reporting period. Please be advised that monthly revenue and expenditure activities are to be reported on these forms.	√	√	√	√

DOMINION ENERGY *(former SCE&G)* PROJECT SHARE FUNDS

- Qualifying households may use Dominion Energy's (SCE&G) Project Share funds to pay outstanding utility bills or deposits, not to exceed $1,000.
- Dominion's (SCE&G) Project Share funds will continue to follow LIHEAP rules to include allowable charges as defined by OEO, except for Tier Two.
- An agency may use Dominion's (SCE&G) Project Share funds combined with LIHEAP as a supplemental service or as standalone service during the Program Year.

Tier One – LIHEAP Eligible Customers (At or Below 150% of FPL)

1. Dominion's (SCE&G) Project Share funds may be used to satisfy outstanding allowable balances in conjunction with a Dominion (SCE&G) customer's LIHEAP Service. A maximum of two supplemental Dominion (SCE&G) Project Share services may be rendered during the Program Year, not to exceed $1,000.

   a) Example: Total Customer Bill = $1,500 in allowable charges. Staff would charge $1,000 to LIHEAP and the remaining $500 to Dominion (SCE&G) Project Share. Customer is then eligible for a second Project Share service not to exceed $500.

   b) Example: Total Bill = $1,100, however, the bill includes illegal activity and/or non-utility charges totaling $50. LIHEAP funds may pay $1,000; Dominion (SCE&G) Project Share funds may pay $50; and the customer is responsible for unallowable costs of $50. Unallowable costs may also be deducted from the customer's total benefit.

2. LIHEAP eligible customers with a documented need may receive a one-time Dominion Energy (SCE&G) Project Share service, not to exceed $1,000.

Tier Two – Customers exceeding 150% of the FPL (Eligible at 151 – 200% of the FPL)

1. Income eligible customers with a documented need may receive a one-time Dominion (SCE&G) Project Share service, not to exceed $1,000. Customer files must include a DBA application, current I.D, proof of household income, and a copy of the customer's current bill.

DUKE PROJECT SHARE FUNDS

Duke Energy Project Share Fan Relief Fund

Duke Project Share assistance may be provided as a separate service **once** during the program year. Therefore, two LIHEAP services and one Duke Project Share service may be provided to an eligible household.

- Any elderly citizen aged 60 or older, residing in a county served by Duke Power, in need of cooling assistance may receive a fan, not to exceed $50 in value. One fan during the program year is allowed. A fan purchased through Duke's Project Share is a gift and is not to be counted as an ECIP or DA LIHEAP service.

- In lieu of a fan, a one-time $50 credit is available during the program year only for income eligible Duke Power customers age 60 or older. Applicants must provide a copy or original of the current Duke Energy bill which is to be retained in the applicant's file. If given the $50 credit, an applicant may also receive LIHEAP assistance, if program eligible and funds are available. Applicants who receive the $50 credit may not also receive a fan.

- The $50 credit assistance is one-time per year, per Duke Power household.

- Unallowable costs may be deducted from the customer's total benefit.

- ***New!!!*** An agency may use Duke's Fan Relief fund combined with LIHEAP as a supplemental service or as a standalone service during the Program Year.

DUKE ENERGY PROGRESS ENERGY NEIGHBOR FUND

Qualifying households may use Duke's Energy Neighbor Project Share fund to pay outstanding utility bills or deposits, not to exceed $1,000. Duke's Energy Neighbor Project Share fund will continue to follow LIHEAP rules to include allowable charges as defined by OEO. **Maximum level household assistance: ECIP $1,000 and Direct Assistance $750.**

- *New!!!* An agency may use Duke's Energy Neighbor Project Share funds combined with LIHEAP as a supplemental service or as a standalone service during the Program Year. Unallowable costs may also be deducted from the customer's total benefit.

LIHEAP DISASTER RELIEF

LIHEAP Disaster Relief measures may only be provided upon OEO directive. The following activities will be considered allowable uses of LIHEAP funds to deal with disaster relief crisis, particularly with respect to assistance for home energy related needs resulting from a hurricane or other natural disaster:

Allowable uses of LIHEAP funds for disasters

1. Costs to temporarily shelter or house individuals in hotels, apartments or other living situations in which homes have been destroyed or damaged, i.e., placing people in settings to preserve health and safety and to move them away from the crisis (rent and/or mortgage payments are not allowed)
2. Costs for transportation to move individuals away from the crisis area to shelters, when health and safety is endangered by loss of access to heating or cooling (based on season)
3. Utility reconnection costs
4. Repair or replacement costs for furnaces/air conditioners (based on season)
5. Coats and blankets, as tangible benefits to keep individuals warm (heating season only)
6. Crisis payments for utilities and utility deposits

Unallowable uses of LIHEAP funds for disasters

1. Payments for water/sewage and other non-energy-related costs
2. Mortgage or rent assistance
3. Utility assistance for households housing displaced victims UNLESS the household is already low income and qualifies for LIHEAP assistance
4. Ramps and wheelchairs
5. School uniforms and school supplies
6. Clothing (except for coats)
7. Mattresses, cots, air beds and pillows

Income Eligibility Requirement: The LIHEAP statute does not authorize waiving income eligibility guidelines (150% of the FPL or below); therefore, income eligibility must be verified before services may be provided. However, the LIHEAP statute permits LIHEAP grantees (OEO) the flexibility to provide services to households with at least one member who receives assistance under the TANF, SSI, and Food Stamp programs. Any consideration of eligibility that deviates from South Carolina's approved LIHEAP State Plan **must** be approved by OEO prior to the delivery of service.

Disaster Relief Application Processing Requirements: The LIHEAP statute authorizes the use of LIHEAP funds for "energy crisis intervention". The 48 and 18-hour time frames do not apply when a grantee is affected by a natural disaster.

Updated!!! LIHEAP APPEALS & FAIR HEARING

Section 2605(b) (13) of the LIHEAP statute (42 U.S.C. § 8624(b) (13)) requires that each applicant be given an opportunity to have a fair administrative hearing if he/she is denied assistance or if his/her application is not acted upon with reasonable promptness. Each CAA must post South Carolina Office of Economic Opportunity's standardized statewide Appeal and Fair Hearing procedures in a visible location in each office, **outlining the three levels of appeal.**

Levels of Appeal

- Applicants should first file a written appeal with the Community Action Agency in which he/she applied for service(s), requesting a formal hearing within 30 calendar days of the agency's Notice of Denial of Assistance/Services.
- If the appeal is denied at the Community Action Agency, the applicant may file a written appeal to the Office of Economic Opportunity (OEO) within 20 calendar days of the agency's notification of their

hearing decision. The written appeal shall be submitted to:

Attention: Legal Counsel
The South Carolina Department of Administration
Office of Economic Opportunity
1205 Pendleton Street, Suite 366
Columbia, SC 29201

- If the appeal is further denied by OEO, the applicant may file a written appeal within 20 calendar days of the applicant's receipt of OEO's written hearing decision. The Department of Administration's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within 30 days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act.

The funds or services in question must be obligated (set aside) until a final decision is reached. If the applicant is successful, the funds or services will be provided to the applicant. If the applicant is unsuccessful, funds are to be reverted to Client Assistance and made available to eligible participants.

All paper and DBA applications must include a clause notifying applicants of their right to appeal and a fair hearing if service is denied, as required by Section 2605(b)(13) of the LIHEAP statute.

CARES Act Guidance

for CSBG and LIHEAP Eligible Entities

This section provides guidance to the South Carolina Community Action Network to prepare for the impact of the Coronavirus on program operations.

The Federal income eligibility range is based on a household's income. Income guidelines for all **CSBG** programs increased from 125 percent to 200 percent of the federal poverty level (FPL). **LIHEAP** remains at 150 percent of the Federal Poverty Level

One-time Income Verification

Income eligibility will be determined once during a program year considering the household's 30-day income at the time of the initial application. If the household meets the income guidelines, the household will be considered eligible for all qualifying grants for the remainder of the program year. If the person/household seeks additional assistance during the same program year, the applicant will only be required to present a current bill and supporting documentation.

OPTIONAL: Disaster Relief Declaration of Income for Lost Wages due to COVID-19

For customers who can prove they have recently become unemployed or furloughed due to COVID-19, it may be considered an emergency with sufficient proof. For example, a letter from an employer. For customers who can provide proof of becoming unemployed or furloughed due to COVID-19 the agency should **NOT** consider the customer's past 30-day wages. Instead, utilize the Declaration of Zero Income form considering only the persons reduced wage amount for 30-days forward.

CARES Act (COVID-19) Stimulus Exclusions

CARES Act stimulus funds, to include the weekly Unemployment Insurance benefit (of $600), will **not** be counted as income.

Effective May 20, 2020, CARES Act Unemployment Insurance will not be counted as income through July 31, 2020. However, traditional unemployment benefits must still be counted as income. It is the responsibility of the agency to request a detailed printout of all unemployment benefits to ensure this income is calculated correctly.

Unallowable Charge Deductions

To alleviate hardships and streamline service delivery, CAAs may deduct unallowable fees from the customer's/household's maximum benefit.

It is the responsibility of the agency to determine if the benefit will alleviate the household's emergency. If the customer's benefit will not restore/maintain the household's energy, the customer will be required to pay the necessary amount or LIHEAP service cannot be provided.

Documentation Verification

Due to the pandemic, OEO realizes customers have limited to no access to certain businesses to retrieve documentation for eligibility. Social Security Offices, DMV, and buildings where customers get documentation for verification may be closed or operating with limited hours. OEO encourages the use of other methods of verification. For example: using another current bill to verify the customer's address. Agencies should utilize the Declaration of Zero income form to verify income only when a customer is unable to provide the proper documentation. Notes in DBA should fully detail alternative documents used for verification.

Award Letters

Agencies may utilize 2019 award letters for customers who do not have access to their 2020 SS/SSI Award letters. Please notate in the file why the 2019 SS/SSI Award appears and account for the estimated income utilizing the Declaration of Zero Income form.

SC DMV Extension for Expired IDs

The SC DMV is "treating all identification cards, non-commercial driver's licenses, beginner's permits, commercial driver's licenses, commercial learner's permits, and parking placards for people with disabilities with **expiration dates from March 1, 2020 through June 30, 2020, as valid until July 1, 2020."**

CAAs should place the **SC DMV Expirations Extensions Memorandum** in the customer's file for applicants with expired IDs/licenses from March 1, 2020 through June 30, 2020. This will be OEO's only exception unless further guidance is received.

Application Intake Alternatives

An agency may use alternative methods to process applications such as mail-in applications, utilizing a physical secure drop box, or online applications through a secure site. Regardless of the method utilized, it is the agency's responsibility to safeguard applicants Personally Identifiable Information (PII). This includes activities performed by CAA employees outside of the agency (ex. telecommuting).

Important: It is not safe to send Personally Identifiable Information (such as Social Security numbers, picture ID's and Income) over text message. **All PII should be encrypted while transmitted over the internet.**

The **online fillable application**, produced by OEO, contains language where the customer provides consent to the agency to access their accounts. A signature on this form will waive any other necessary signatures. The agency is still required to transfer information from the fillable form to DBA and complete the remaining information and characteristics in the statewide database for accurate reporting.

Agencies may use the information on file for previously served customers, confirming that the household's information is still accurate (address, vendor, account number, etc.). Note: If the customer has already been served during PY 2020, income does not need to be verified.

If the agency chooses not to utilize this form, the entity is encouraged to create a **Universal Waiver Form** to require only one signature.

CSBG COVID-19 INITIATIVES

COVID-19 CSBG services should provide a benefit directly in response to the COVID-19 pandemic. Agencies will need to create CSBG COVID-19 initiatives and submit a logic model to OEO for approval *before* the agency begins rendering service(s). OEO encourages agencies to perform a Community Needs Assessment to ensure strategies and services are based on locally defined needs from the community's own analysis of the poverty related problems directly caused by the COVID-19 pandemic.

Frequency of CSBG COVID-19 Services

The frequency of CSBG COVID-19 services is determined by the eligible entity (CAA)and approved by OEO by way of the agency's logic model.

Maximum Allowance for COVID-19 Services

The maximum amount of CSBG funds allocated per household is determined by the eligible entity (CAA)and approved by OEO via the agency's annual Community Action Plan.

Important!!! Services specific to COVID-19 must be tracked separately from regular CSBG services. **Please note**: In times of disaster, usual time frames (CSBG 72-hour requirement) do not apply.

CSBG COVID Initiatives to Consider

COVID-19 Mortgage Assistance

Mortgage assistance is limited to a one-month mortgage assistance payment during the program year, not to exceed the agency's determined maximum for regular mortgage assistance. This payment may be considered as a second assistance with mortgages in addition to the standard CSBG mortgage payment. Example: one mortgage assistance utilizing regular CSBG funds and one mortgage assistance from COVID funds.

Feeding Partnerships

Eligible entities may partner with local food banks, summer food service programs including Title 1 schools, and other nutrition programs to provide meals to low-income families/communities.

The agency is not required to complete individual applications but must have an MOU with the partnering agency and proof that the entity serves low-income individuals/communities. A breakout of the cost per meal must also be established for reporting purposes. A check/voucher must also be in the file.

Childcare vouchers

Childcare vouchers may be provided to parents returning to work. Proof required.

Internet Service

Monthly internet service may be provided to low-income families/children working from home/participating in school activities from home. Proof required.

Infant Care

Agencies may aid with **diapers, wipes and formula** to families with young children. Gift cards are not allowable.

Personal Protective Equipment (PPE)

PPE, such as hand sanitizer, face masks and gloves may be provided to income eligible families.

Prescription Assistance

Assistance with prescriptions may be provided to those who have lost income/insurance benefits due to the pandemic.

LIHEAP COVID-19

LIHEAP COVID-19 SUPPLEMENTAL BENEFIT PROGRAM

The LIHEAP COVID-19 Supplemental Benefit is a one-time crisis award in the amount of $1,000 for all income-eligible households. Unallowable charges must be deducted from the household's maximum benefit or paid by the customer prior to issuing the benefit.

If a vendor has agreed to credit LIHEAP benefits accordingly, the agency may credit the full benefit to the customer's account *(Ex. Dominion Energy customers)*. However, if unallowable charges appear on the customer's bill(s), and the vendor has not agreed to apply the LIHEAP grant accordingly, the agency should deduct these fees from the total benefit.

Example: The customer is eligible for $1,000, but usually has a $10 monthly outside light fee. On average, the customer's bill is $200.

The agency would determine that the $1,000 benefit could carry the customer for 5 months forward. A $10/month unallowable charge for 5 months is $50. Therefore, the agency would award the customer $950.

It remains the responsibility of the agency to verify allowable charges. If the customer is unable to provide utility bills, the agency can only pay what can be verified on the bill(s) available. **This benefit is an additional (or third) LIHEAP service.**

Important!!! LIHEAP services specific to COVID-19 must be tracked separately from- regular LIHEAP services. **Please note**: In times of disaster, usual crisis time frames (18 to 48-hours) do not apply.

PREPAID CUSTOMERS

Due to the suspension of utility disconnections related to COVID-19, prepaid customer accounts may show arrearages. **Prepaid customers are eligible to receive the onetime COVID-19 benefit.**

The customer's file must include an account history, daily usage history and account balance to justify the award.

SUSPENDED DISCONNECTS/FINAL NOTICES -

Due to the suspension of final/disconnect notices, OEO will consider bills with arrearages that exceed two (2) months an emergency.

COMBINED EMERGENCY LIHEAP ASSISTANCE

Due to the unusually high arrearages on customer bills related to COVID-19 disconnect suspensions, **LIHEAP 2020 ECIP funds may be combined with LIHEAP COVID-19 funds to satisfy outstanding allowable balances exceeding $1,000.**

The household's combined LIHEAP ECIP and LIHEAP COVID-19 benefit must be awarded on the same day and may not exceed $2,000 (LIHEAP ECIP 2020 max. - $1,000; LIHEAP COVID-19 max. - $1,000).

A combined award will count as TWO services (one LIHEAP ECIP, one LIHEAP COVID-19 benefit).

a) Example: Total Customer Bill = $2,000 in allowable charges. Staff would charge $1,000 to LIHEAP ECIP and the remaining $1,000 to LIHEAP COVID-19.

b) Example: Total Bill = $1,100, however, the bill includes illegal activity and/or non-utility charges totaling $50. LIHEAP COVID-19 funds may pay $1,000; LIHEAP ECIP 2020 funds may pay $50; and the customer is responsible for unallowable costs of $50. Unallowable costs may also be deducted from the customer's total benefit.

Because COVID-19 services must be tracked separately, agencies must complete two (2) action plans, two (2) vouchers, two (2) awards, etc. when awarding a combined benefit.

IMPORTANT:

- Customers are only eligible to receive **one** COVID-19 benefit during the 2020 program year, regardless of if the maximum amount is awarded.
- It is at the agency's discretion to determine which fund to utilize when awarding a combined benefit.
- Project Share funds shall not be combined with the COVID-19 benefit.

LIHEAP Checklist

FAMILY APPLICATION	YES	NO
TOTAL HOUSEHOLD INCOME DOCUMENTATION (Weekly/Bi-Weekly/Semi-Monthly/Monthly)	YES	NO
CURRENT AND LEGIBLE PICTURE ID	YES	NO
SOCIAL SECURITY NUMBERS (Entire Household)	YES	NO
ELECTRIC/GAS BILL or STATEMENT FROM VENDOR	YES	NO
PROPANE/ FUEL OIL BILL DELIVERY TICKET	YES	NO
DIRECT ASSISTANCE WORKSHEET	YES	NO
DIRECT ASSISTANCE SLAPP PLAN	YES	NO
ECIP: CURRENT UTILITY BILL/FINAL NOTICE Bill Date: _____ Cause of Emergency: _____	YES	NO
REFERRAL FORM (If Applicable)	YES	NO
VOUCHER/ CHECK NUMBER	YES	NO

COMPLETED BY: _____ DATE: _____

REVIEWED BY: _____DATE: _____

New!!! Appendix G

(Agency Name)

Disaster Relief: COVID-19 DECLARATION OF INCOME (Applicant)

The **Community Services Block Grant** (CSBG) and **Low-Income Home Energy Assistance Program** (LIHEAP) provide disaster relief funding to aid economically disadvantaged households with recovery efforts following a natural catastrophe and/or public health crisis. To comply with the requirements of the grant(s), we ask your cooperation in supplying the information requested in the Certification below. This information will be held in strict confidence and used only for the purpose of establishing program eligibility.

I understand sources of income include, but are not limited to, the following:

Wages	Disability	Retirement Funds
Self-Employment	Social Security	Asset Income
Unemployment Compensation	SSI	Other
Lottery/Gifts	AFDC	
Education Grant Refunds/Work Study	Family Support	

_____

My wages have been reduced due to

_____

_____

_____

My monthly reduced earnings will be: $_____

I certify that the information contained above is complete and accurate. Inquiries may be made to verify statements herein. I understand that I am signing this statement under penalty of prosecution to the full extent of South Carolina law. **I understand that I may be financially or legally liable for any misrepresentation. I also understand that false statements or omissions are grounds for disqualification and/or debarment.**

Executed this ____ day of _____, 20 ____.

_____
Name of Applicant Date

_____
Signature of Applicant Date

_____
Agency Representative Date

Revised 4/20

New!!! Appendix H

South Carolina
Office of Economic Opportunity

STATEWIDE APPEAL AND FAIR HEARING PROCEDURES

Section 2605(b) (13) of the LIHEAP statute (42 U.S.C. § 8624(b) (13)) requires that each applicant be given an opportunity to have a fair administrative hearing if he/she is denied assistance or if his/her application is not acted upon with reasonable promptness.

LEVELS OF APPEAL

- Applicants should first file a written appeal with the Community Action Agency in which he/she applied for service(s), requesting a formal hearing within 30 calendar days of the agency's Notice of Denial of Assistance/Services.

- If the appeal is denied at the Community Action Agency, the applicant may file a written appeal to the Office of Economic Opportunity (OEO) within 20 calendar days of the agency's notification of their hearing decision. The written appeal shall be submitted to:

  Attention: Legal Counsel
  The South Carolina Department of Administration
  Office of Economic Opportunity
  1205 Pendleton Street, Suite 366
  Columbia, SC 29201

- If the appeal is further denied by OEO, the applicant may file a written appeal within 20 calendar days of the applicant's receipt of OEO's written hearing decision. The Department of Administration's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within 30 days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act.

Funds in question must be obligated (set aside) until a final decision is reached. If the applicant is successful, the funds or services will be provided to the applicant. If the applicant is unsuccessful, funds are to be made available to eligible participants.

Appendix I

Sample LIHEAP Household Report

The *LIHEAP Household Report--Long Format* is for use by the 50 States, District of Columbia, and insular areas with annual LIHEAP allotments of $200,000 or more. This Federal Report provides data on both LIHEAP recipient and applicant households for Federal Fiscal Year (FFY) 2018, the period of October 1, 2017 - April 30, 2018 The Report consists of the following sections: (1) **Recommended Long Format for LIHEAP Assisted Households** and (2) **Recommended Format for LIHEAP Applicant Households**. Data on assisted households are included in the Department's annual *LIHEAP Report to Congress*. The data are also used in measuring targeting performance under the Government Performance and Results Act of 1993. As the reported data are aggregated, the information in this report is not considered to be confidential.

There are two types of data: (1) **required** data which must be reported under the LIHEAP statute and (2) **requested** data which are optional, in response to House Report 103-483 and Senate Report 103-251. Both the *LIHEAP Household Report--Long Format* (the Excel file name is hhsrptst.xls) and the instructions on completing the Report (the Word file name is hhrptins.doc) can be downloaded in the Forms sections of the Office of Community Services' LIHEAP web site at: www.acf.hhs.gov/programs/liheap/grantees/forms.html#household_report . The spreadsheet is page protected in order to keep the format uniform. The items requiring a response are not page protected. However, other areas of the spreadsheet cannot be modified. For example, the number of assisted and applicant households can not be entered. Each total will be calculated automatically for each type of assistance by a formula when the poverty level data are entered.

Does the data below include estimated figures? No [ ] Yes [ ] Mark "X" in the second column below for each type of assistance that has at least one estimated data entry.

1. RECOMMENDED LONG FORMAT FOR LIHEAP ASSISTED HOUSEHOLDS

			REQUIRED DATA									REQUESTED DATA	
Type of assistance	Mark "X" to Indicate estimated data	Number of assisted households	2018 HHS Poverty Guideline interval, based on gross income and household size					At least one member who is				At least one member who is	
			Under 75% poverty	75%-100% poverty	101%-125% poverty	126%-150% poverty	Over 150% poverty	60 years or older (elderly)	Disabled	Age 5 years or under (young child)	Elderly /Disabled /Young Child	Age 2 years or under	Age 3 years through 5 years
Heating		0	0	0	0	0	0	0	0	0	0	0	0
Cooling		0	0	0	0	0	0	0	0	0	0	0	0
Winter/Year Round Crisis		0	0	0	0	0	0	0	0	0	0	0	0
Summer Crisis		0	0	0	0	0	0	0	0	0	0	0	0
Other Crisis (specify)		0	0	0	0	0	0	0	0	0	0	0	0
Any type of LIHEAP assistance		0						0	0	0	0		

2. RECOMMENDED FORMAT FOR LIHEAP APPLICANT HOUSEHOLDS (regardless of whether assisted)

			REQUIRED DATA					
Type of assistance	Mark "X" to Indicate estimated data	Number of applicant households	HHS Poverty Guideline interval, based on gross income and household size					
			Under 75% poverty	75%-100% poverty	101%-125% poverty	126%-150% poverty	Over 150% poverty	Income data unavailable
Heating		0	0	0	0	0	0	0
Cooling		0	0	0	0	0	0	0
Winter/Year Round Crisis		5	3	2	0	0	0	0
Summer Crisis		0	0	0	0	0	0	0
Other Crisis (specify)		0	0	0	0	0	0	0

LIHEAP Glossary of Terms

Primary Heating – the main form of energy used by a household to heat its dwelling, either deliverable or a utility. (*For example, the household heats the dwelling with an HVAC system that is fueled by natural gas. Therefore, the agency would select "natural gas". Other possible options include electric, propane, etc.)*

Secondary Heating – the other form of energy used by a household to satisfy only a portion of the heating requirements of a dwelling. *(For example, a dwelling uses a fireplace to supplement its primary heating. Therefore, the agency would select "wood". Other possible options include kerosene, natural gas, electric, etc.)*

Heating Source – a type of device a household uses to heat the dwelling (where the source of heat comes from). *(Examples: central heat (HVAC), kersoene, propane, space heater, wood, etc.)*

Cooling Energy - the main form of energy used by a household to cool its dwelling. (*For example, the household cools the dwelling with a central HVAC system that is run by electricity. Therefore, the agency would select "electric".*

Cooling source – a type of device used to cool the home (where the source of cooling comes from). *(For example, a dwelling uses a window air conditioner to cool the home. Therefore, the agency would select "window air conditioner unit". Other possible options include central air (HVAC), fan, etc.)*

Fuel Oil - the burnable liquids produced from crude oil. **Fuel Oil is commonly known as kerosene**.

Propane - a flammable hydrocarbon gas of the alkane series, present in natural gas and used as bottled fuel. *(Example Vendors: Suburban Propane, L.P. Gas Co., AmeriGas Propane, etc.)*

Natural Gas - flammable gas, consisting largely of methane and other hydrocarbons, occurring naturally underground (often in association with petroleum) and used as fuel. *(Example Vendors: SCE&G, Duke, Piedmont Natural Gas, etc.)*

Energy Burden - the expenditures of the household for home energy divided by the income of the household.

Energy Efficiency - the use of energy in an optimum manner to achieve the same service that could have been achieved using a common less efficient manner. LIHEAP considers both the energy burden of such household and the unique situation of such household that results from having members of vulnerable populations, including very young children, individuals with disabilities, and elderly individuals.

DBA System & Program Descriptions for LIHEAP

ECIP Heating/Cooling – LIHEAP crisis assistance provided in response to a situation that has already or poses an immediate risk to life, health and safety directly related to the home or home energy heating/cooling costs. Section 2604(c)(1)(2) of the LIHEAP Statute requires not later than 18-48 hours after a household applies for energy crisis benefits, the eligible entity (CAA)provide some form of assistance that will resolve the energy crisis if such household is qualified to receive such benefits.

ECIP Window Unit – a LIHEAP crisis service that provides households a window unit that otherwise reports no operable source of energy to heat/cool the home. The LIHEAP Statute requires not later than 18-48 hours after a household applies for energy crisis benefits, the eligible entity (CAA)provide some form of assistance that will resolve the energy crisis if such household is qualified to receive such benefits.

DBA System & Program Descriptions for LIHEAP *(continued)*

ECIP Heater – a LIHEAP crisis service that provides households a cost-effective and efficient heater that otherwise reports no operable source of energy to heat the home. The LIHEAP Statute requires not later than 18-48 hours after a household applies for energy crisis benefits, the eligible entity (CAA)provide some form of assistance that will resolve the energy crisis if such household is qualified to receive such benefits.

LIHEAP Emergency Intervention Service – an intervention provision provided to a household when an approved emergency LIHEAP service cannot be alleviated/executed within the required 18 or 48 hours, and the household has no way to safely heat/cool the home in the interim. The LIHEAP Statute requires not later than 18-48 hours after a household applies for energy crisis benefits, the eligible entity (CAA)provide some form of assistance that will resolve the energy crisis if such household is qualified to receive such benefits. A household ***must*** be provided a safe source to heat/cool the home or temporary shelter until installation. Intervention services include heaters, fans or temporary shelter.

LIHEAP Local Agency Programs – a system program that allows agencies to provide a LIHEAP benefit and pay multiple vendors in a single service. *(Example: An agency may pay to purchase a window unit and also pay a separate contractor to install the unit. Using the LIHEAP Local Agency Programs, the system will attribute both payments to a single LIHEAP service, instead of counting them as two separate services.)* See **Voucher Reference** below for instructions on how to detail the service provided.

Voucher Reference – when creating a voucher in DBA using "LIHEAP Local Agency Programs", the **Reference** field dropdown provides options to detail the service provided. *(Example: Chimney sweep, Emergency Intervention Services (heaters, fans, or temporary shelter).*

DA Heating/Cooling – a LIHEAP nonemergency beneifit to aid low-income households in meeting their home energy costs, particularly the vulnerable and those with the lowest incomes that pay a high proportion of household income for home energy.

Selected LIHEAP Assistance Payment Plan (SLAPP) – when a nonemergency LIHEAP benefit is applied to the client's bill incrementally, over a period of time. Fundamentally, SLAPP *is* a Direct Assistance benefit, only the full benefit amount may not be provided immediately if the household has a vendor that cannot separate unallowable charges. LIHEAP can only pay for costs associated with the heating/cooling of the home. If LIHEAP funds are used by vendors in ways that are different than what is described in the LIHEAP Statute and State Plan, this may constitute an improper use of funds. *(Reference LIHEAP IM 2010-13 Use of LIHEAP Funds Coordinated with Vendor Assistance Programs).*

LIHEAP Blankets – a LIHEAP service that allows blanket distribution as an energy expense in addition to a LIHEAP nonemergency or crisis assistance, if funding is available and approved by OEO.

LIHEAP Assurance 16 - the LIHEAP Statute (Section 2605(b)(16)) allows States, at its option, to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance. Assurance 16 activities must be approved by OEO.

LIHEAP Outreach Activities - Section 2605(b)(3) of the LIHEAP statutes allows grantees/subgrantees to conduct outreach activities designed to assure eligible households are made aware of LIHEAP assistance. LIHEAP Outreach Activities include written material, interpretation services, media announcements, etc. LIHEAP Outreach Activities is to promote LIHEAP, **ONLY**. Assurance 16 activities must be approved by OEO. (*Reference LIHEAP Outreach Activities).*

How to Use the ROMA Logic Model

Program Connections Using a Logic Model Framework Indicators and Outcomes

Need Statement (family level)	**Outcome Statement** (family level)
Parents are not involved in their children's school activities	**Parents increase their involvement with children's school activities**
Service	**Projected Indicators**
50 parents will participate in parent support group meetings during the school year.	50 out of 50 or 100% of parents will report helping with homework by the end of the school year.
	30 out of 50 or 60% of parents will report that they communicated with the teacher within the school year
	45 out of 50 or 90% of parents will report that they participated in school functions and meetings by the end of the school year.

Targets Identify the Scope of the Expected Results

Example of Results (Outcomes):

- Program participants pass the GED test and secure high school diploma
- Parents demonstrate increased knowledge of good parenting skills
- Customers obtain the necessary skills for jobs.

Example of Targets (Projected indicators):

- 30 of 50 participants (60%) will achieve a passing score on the GED exam within the program year to secure a diploma
- 25 out of 50 parents (50%) will achieve a passing score on a post test of knowledge related to parenting 30 days after the completion of the training program.
- 50 out of 100 customers (or 50%) in training classes will obtain skills within one year

How Do You Know?

Organization/Program: Adult Education			Level: _X_ family __ agency __ community		
Need	Service or Activity *Include who will be served, how many people/units of service and time frame.*	Outcome	Indicator *Of those who will be served, how many will achieve the outcome in the time frame.*	Evidence The tool that will be used to measure and document success.	Data collection processes and personnel
Individuals in the community have no HS diploma or GED.	50 students will enroll in a year long GED test preparation class.	Program participants pass the GED test and secure a high school diploma	30 of 50 (60%) will achieve a passing score on the GED exam within the program year.	Output Measure: Attendance log from class. Outcome Measure: GED test scores , copy of diploma	Program attendance is logged during every class. GED test scores are logged by staff.
Mission Statement:					

Note: This is a planning logic model and does not have an Actual Column Included or NPIs featured.

What actually happened?

Projected Indicators	Actual Indictors
30 of 50 participants (60%) will achieve a passing score on the GED exam within the program year	28 of 50 participants (56%) actually achieved a passing score on the GED exam within the program year
25 out of 50 parents (50%) will achieve a passing score on a post test of knowledge related to parenting 30 days after the completion of the training program.	26 out of 50 parents (52%) actually achieved a passing score on a post test of knowledge related to parenting 30 days after the completion of the training program.
50 out of 100 customers (or 50%) in training classes will obtain skills within one year	55 out of 100 customers (or 55%) in training classes actually obtained skills within one year

Agency Ability to Target

Targeting Success Calculation
GED follow up: 28 achieved / 30 were projected to achieve = a 93% accuracy rate for our targets.
Parenting Knowledge follow up: 26 achieved / 25 were projected to achieve = a 104% accuracy rate for our targets.
Job Skills follow up: 55 achieved / 50 were projected to achieve = a 110% accuracy rate for our targets.

SOUTH CAROLINA LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)
VENDOR AGREEMENT

This Vendor Agreement shall govern certain activities of the Low-Income Home Energy Assistance Program, hereinafter referred to as LIHEAP, which are to be carried out by the Vendor identified on the signature page of this Agreement, hereinafter referred to as the Vendor, as a condition of receipt of payment, and the Community Action Agency; hereinafter referred to as the CAA.

The_____and the Vendor agree to the following:
(Community Action Agency)

A. SERVICES TO BE PERFORMED

1. The Vendor shall 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.
2. The Vendor is required to verify the account holder's name and/or household member(s), account number, current balance on account and signature upon receipt of the energy voucher prior to crediting the customer's account.
3. The Vendor will accept the voucher(s) as credit for actual commitment/cash payment for the purchase of home heating fuel or cooling assistance. The Vendor shall specify on the signature page of this Agreement the fuel type to be provided. The Vendor will accept vouchers for the purchase of only the type fuel approved in this Agreement.
4. The Vendor will only deliver fuel to the actual residence of the account holder or credit the account of the account holder as documented on the voucher.
5. If the customer has moved and the energy voucher does not reflect the new address, the Vendor shall not accept the voucher until the customer returns the voucher and requests a change of address from the Community Action Agency (CAA).
6. Vendors are to ensure credit and/or service to approved households within the designated programyear.
7. This assistance is provided for households, not individuals. For this reason, no name changes may be made on the energy voucher. The address that appears on the voucher should match the name and address shown on the Vendor records. No alterations of any kind should be made to the voucher.
8. LIHEAP assistance may be used for deposits if specified by the CAA.
9. The parties recognize that each party is bound to act in accordance with their respective bylaws and policies at all times. Nothing in this Agreement is intended or shall be construed to supersede a party's obligations under their respective bylaws and policies or prevent a party from acting in accordance therewith.

B. PROVISIONS UNDER WHICH PAYMENT WILL BE MADE TO VENDORS

1. The Vendor must return this properly executed Vendor Agreement to the CAA prior to being reimbursed.
2. The Vendor must provide a Federal Employer Identification Number (FEIN) or a Social Security number will be acceptable only if the Vendor is an individual and has no FEIN.
   a. If a Vendor provides a Social Security Number, the Vendor must use the proprietor's name, not the company name. If a FEIN is supplied, a company name must be used.
   b. The Vendor shall notify the CAA in writing immediately when the FEIN, Social Security number, business name and/or address changes. Failure to report changes may result in a delay of payments. An IRS W-9 must accompany changes.

3. For fuel oil, propane and/or kerosene, the Vendor shall provide the eligible customer a quantity up to the value of the energy voucher but not to exceed the amount required to fill the tank. A delivery ticket must be submitted for actual payment remittance within 30 days of the delivery.

   a. If the value of the quantity of fuel purchased by a customer is less than the value of the energy voucher, the Vendor shall credit the difference to the customer's account. The credit balance on accounts that equals or exceeds the minimum delivery must be expended each consecutive month until the benefit is exhausted.

   If the value of the quantity of fuel required/purchased by a customer is greater than the energy voucher amount, payment for the remaining balance due must be negotiated between the customer and the Vendor. The CAA will not intervene in these matters.

   b. **The Vendor will not exchange a customer's energy voucher for cash nor will any cash equivalent be given for excess credit.** Violations shall be treated in accordance with Federal and State statutes, to include termination of this Agreement and termination of future services with the Vendor.

   c. When a customer moves from the Vendor's service area, or becomes deceased, and a credit balance remains on that account, the following policies shall apply within the current program year:

      i. Any legal survivors living in the residence of the deceased customer (as listed on the voucher), who were household residents at the time of application, are entitled to use the remaining benefit.

      ii. If there are no remaining legal survivors within the household, any remaining credit balance shall be refunded to the CAA within 30 days of the death or date of last service for the active voucher – whichever comes first.

      iii. Credit balances not used during the current program year (January 1 – December 31) are to be returned to the CAA within 45 days of the close of the grant period.

      iv. Any other circumstances arising shall be dealt with on a case-by-case basis. The Vendor should contact the CAA for additional instruction.

C. PAYMENT PROCEDURES

1. Once the Vendor has honored the energy voucher, as specified herein, the Vendor shall mail the energy voucher(s) to the CAA for payment.

2. Within 30 days of the date of the receipt of the energy voucher(s), payment amount equal to the total amount of the energy voucher(s) for electric service received by the CAA will be made to the Vendor. For kerosene, propane, fuel oil and/or wood vendors, payment will be made for the actual amount delivered, not to exceed the voucher amount.

   If a Vendor has not received payment for the energy voucher(s) within 30 days following the submission, the Vendor should contact the CAA and report the delay. In instances of reported delays, the Vendor may also contact the Office of Economic Opportunity (803-734-0662).

3. CAAs will submit an IRS Form 1099 to record payments in excess of $600 to non-incorporated vendors.

4. All properly executed Vendor Agreements must be maintained on file with the CAA and Vendor.

D. MONITORING

1. The Vendor will maintain records documenting the amount of energy assistance that the customer received and the date of receipt for all fuels other than electricity and natural gas. Records are to be maintained for one year after the program year ends.

2. The Vendor shall permit access to records pertaining to the activities engaged in by the Vendor under this Agreement. Such records include energy voucher payment forms or other documents supporting the delivery of services or receipt of payments for services rendered by the Vendor, as well as the amount of sale, customers' names and addresses.

3. The Vendor shall not discriminate against or adversely treat any eligible household regarding terms and conditions of sale, credit, delivery, or service. No discrimination shall be made based on the source(s) of household income. All sources of household income are documented on the Application and then processed, reviewed and approved by an agency representative. Additionally, the State prohibits any discrimination to households because of their receipt of LIHEAP assistance.

4. The Vendor will cooperate with any Federal, State or local investigation, audit or programreview.

E. LIABILITY

To the fullest extent permitted by law, each party agrees to indemnify and hold harmless each other, the Office of Economic Opportunity and their agents, and employees from and against all claims, damages, losses, and expenses including but not limited to attorney's fees, arising out of or resulting from, whether directly or indirectly, any default or negligent or wrongful act or omission of each party, its agents, employees, or subcontractors in the performance or non-performance of the work, the enforcement of this agreement, or any other legal action.

Any losses caused by criminal activity, gross negligence and/or malicious intent is excluded from this indemnification section.

F. REPORTING DISCLOSURE

The Vendor will allow the CAA and the Office of Economic Opportunity access to LIHEAP customer's household fuel/utility/energy information for the purpose of State and Federal data reporting, as approved by the customer, via the statewide application for service.

G. AMENDMENTS and INTEGRATION

This Agreement contains the entire agreement of the parties with respect to the subject matter of this Agreement, and supersedes all prior contract, negotiations, agreement and understandings with respect thereto. This Agreement may only by amended by a written document duly executed by all parties.

H. TERMINATION

1. Either the CAA or the Vendor may terminate this Agreement by giving the other party at least 30 days written notice.

2. This Agreement will terminate immediately should the Vendor supply false information or attempt to defraud the CAA or the eligible customer. In such cases, no additional reimbursement will be made to the Vendor until such matter is resolved.

In witness hereto, the CAA and the Vendor have executed this Agreement on this_____day of _____, 20_____.

VENDOR: **Complete Section 1-9. Do not leave anything blank.**
Vendor must provide physical address or agreement is void.

1. _____
(Business or Vendor Name)

2. _____
(Mailing Address – Include City, State and Zip Code)

3. _____
(Street Address – Include City, State and Zip Code)

4. _____
(Area Code and Telephone Number)

5. **VENDOR DOCUMENTATION**

The Vendor must provide a Federal Employment Identification Number (FEIN), or, if you do not have a FEIN, a Social Security number (SSN) will be acceptable only if used with the proprietor's name (e.g. Hallman's Wood – (FEIN) or Mark Hallman (SSN).

Federal Employer Identification Number_____**or**

Social Security Number _____

6. **Fuel Type – Circle all Types of Fuel Provided.**

Fuel Oil	**Electricity**
Kerosene	**Wood**
Propane Gas	**Coal**
Natural Gas	**Landlord or Building Operator Who Provides Heat to Tenants**

7. **Check all that apply:**

- ☐ **I certify that I am not subject to backup withholding.**
- ☐ **I certify that the mailing address on file is correct and current.**
- ☐ **A W-9 is enclosed as required for new vendor(s), or for existing vendors to report change of address or change in FEIN or Social Security number and/or business name.**

_____	_____
(Print Authorizing CAA Signature)	**(Print Authorizing Vendor Signature)**
_____	_____
(Authorizing Signature)	**(Authorizing Signature)**
_____	_____
(Witness)	**(Witness)**
_____	_____
(Date)	**(Date)**

Appendix M

OFFICE OF ECONOMIC OPPORTUNITY (OEO/State)

CSBG & LIHEAP STAFF INFORMATION:

Questions regarding this Administrative Guide should be directed to OEO's LIHEAP staff:

Kelly Buckson, Senior Manager for CSBG and LIHEAP Programs
(803) 734-0579 kelly.sumpter@admin.sc.gov

CSBG & LIHEAP Program Coordinators and agency assignments:

TBA
Aiken/Barnwell, GLEAMNS, Palmetto CAP, Piedmont, Wateree

Charles Johnson (803) 734-0673 charles.johnson@admin.sc.gov
Beaufort-Jasper, Carolina, Lowcountry, OCAB, SHARE

TBA
Chesterfield/Marlboro, Darlington, Pee Dee, State Association, Waccamaw

Faith Kithome, Economic Advancement Coordinator
(803)734-0317, faith.kithome@admin.sc.gov

Office of Economic Opportunity
1205 Pendleton Street
Columbia, South Carolina 29201

Telephone: (803) 734-0662

Fax: (803) 734-0356

www.oeo.sc.gov

This guide is subject to change at any time during the program year.

2020 COMMUNITY ACTION AGENCY SUBGRANTEES/ELIGIBLE ENTITIES

COMMUNITY ACTION AGENCY	PROGRAM DIRECTOR
Aiken/Barnwell Counties Community Action Agency, Inc. **George A. Anderson, Esq.** Executive Director 291 Beaufort Street Aiken, SC 29801 (803) 648-6836	**Bertie McKie** bertie.mckie@abccaa.org (803) 648-6836 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Beaufort-Jasper Economic Opportunity Commission **Mr. James Williams** Executive Director 1905 Duke St., Suite 250 Beaufort, SC 29902 (843) 255-7220	**Sarah Marshall** smarshall@thebjeoc.org (843) 255-7229 *CSBG & LIHEAP* State/OEO Coordinator: Charles Johnson (803) 734-0673
Carolina Community Actions **Ms. Karen Brackett-Browning** Executive Director 138 South Oakland Avenue Rock Hill, SC 29731 (803) 329-5195	**Mary Reid** mreid@ccainc.org (803) 329-5195 *CSBG & LIHEAP* State/OEO Coordinator: Charles Johnson (803) 734-0673
Chesterfield-Marlboro Economic Opportunity Council **Mr. Samuel D. Bass, Jr.** Executive Director 318-322 Front Street Cheraw, SC 29520 (843) 320-9760	**Rolanda Lewis** rlewis@cmeoc.org (843) 320-2135 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Darlington County Community Action Agency **Ms. Jackie Slayton** Executive Director 904 S. Fourth Street Hartsville, SC 29550 (843) 332-1135	**La'Quantia Goodman** lgoodman@dccaa.net (843) 332-1135 ext. 210 *CSBG & LIHEAP* State/OEO Coordinator: TBA
GLEAMNS Human Resources Commission **Ms. Shunna Jeter**	**Marcella Kennedy** mkennedy@gleamnshrc.org

Executive Director 237 Hospital Street Greenwood, SC 29648 (864) 223-8434	(864) 223-8434 ext. 8829 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Lowcountry Community Action Agency **Ms. Tara Glover** Executive Director 319 Washington Street Walterboro, SC 29488 (843) 549-5576	**Emily Mitchell** eamitchell@lowcountrycaa.org (843) 549-5576 ext.106 *CSBG & LIHEAP* State/OEO Coordinator: Charles Johnson (803) 734-0673
OCAB Community Action Agency **Mr. Calvin Wright** Executive Director 1822 Joe Jeffords Highway Orangeburg, SC 29116 (803) 536-1027	**Janice Spells-Jamison** jjamison@ocabcaa.org (803) 536-1027ext.117 *CSBG & LIHEAP* State/OEO Coordinator: Charles Johnson (803) 734-0673
Palmetto Community Action Partnership **Mr. Casdell Singleton** Executive Director 1069 King Street Charleston, SC 29403 (843) 724-6760	**Ashley White or Thomas Nix** frontdesk@palmetto.org (843) 724-6760 ext. 211, 232 Toll Free (844) 769-6448 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Pee Dee Community Action Partnership **Mr. Walter Fleming** Executive Director 2685 South Irby Street Florence, SC 29501 (843) 678-3400	**Queen McCall** queenmccall@hotmail.com (843) 678-3400 ext. 121 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Piedmont Community Actions, Inc. **Ms. Cynthia Lounds** Executive Director 300A South Daniel Morgan Avenue Spartanburg, SC 29304 (864) 585-8183	**Margie Salters** msalters@pcasp.org (864) 327-1115 *CSBG only* State/OEO Coordinator: TBA
Sunbelt Human Advancement Resources **Ms. Pam Sims** Executive Director 254 S. Pleasantburg Drive Greenville, SC 29607	**Tandy Bannister** tbannister@sharesc.org (864) 269-0700 ext. 3242 *CSBG & LIHEAP*

(864) 269-0700	State/OEO Coordinator: Charles Johnson (803) 734-0673
Waccamaw Economic Opportunity Council **Mr. James Pasley** Executive Director 1261 Hwy. 501 East, Suite B Conway, SC 29528-1467 (843) 234-4100	**Loleta Williams** lwilliams@weoc.org (843) 355-9922 *CSBG & LIHEAP* State/OEO Coordinator: TBA
Wateree Community Actions **Ms. Annette Tucker** Executive Director 1915 Harden Street Columbia, SC 29204 (803) 807-9811	**Margaret Gibson** mgibson@wcai.org (803) 807-9811 *CSBG & LIHEAP* State/OEO Coordinator: TBA
SC Association of Community Action Partnership **Ms. Jessica McMoore** Executive Director 2700 Middleburg Drive, Suite 213 Columbia, SC 29204 (803) 771-9404	State/OEO Coordinator: TBA