



Child and Community Services Division Policy & Procedures

Subject: Low Income Home Energy Assistance Program
Process Owner: Child and Community Services Division
Effective Date: 04/28/2025
Revision Number: 10

Low Income Home Energy Assistance Program

I. POLICY STATEMENT

The Low Income Home Energy Assistance Program (LIHEAP or Program) assists households with low incomes in meeting their immediate home energy needs, particularly those with the lowest incomes that pay a high proportion of household income for home energy. The U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF), administers LIHEAP at the federal level. The Arizona Department of Economic Security (DES), Child and Community Services Division (CCSD), administers LIHEAP for the state of Arizona in accordance with applicable federal guidance, the Arizona LIHEAP State Plan, and this Policy. Arizona utilizes a direct-service, Navigator model for the distribution of LIHEAP benefits. Community Navigators, which work through state-designated Community Action Agencies (CAA) or other community partners, perform outreach and assist Applicants in understanding LIHEAP and completing applications. DES and designated Community Navigators may receive, adjudicate, and make determinations on applications. DES then disburses LIHEAP benefits to approved Households. A LIHEAP applicant may apply online or using a paper application, either directly to DES or with the assistance of a Community Navigator.

Revision 10

Permits Community Navigators to process and adjudicate LIHEAP applications
Clarifies LIHEAP eligibility for Tribe members who have exhausted Tribal LIHEAP
Clarifies SAVE immigration check procedures for Crisis Assistance applications

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III. APPLICABILITY

This policy applies to all DES Employees, contracting staff, and Community Navigators who are involved with the administration of LIHEAP.

IV. AUTHORITY

[42 U.S.C. § 8621-8630](#)

Low Income Home Energy Assistance

[45 CFR 96](#)

Block Grants, parts A-F, H

[45 CFR 75](#)

Administration of Health and Human Services Awards

[LIHEAP IM 2014-07](#)

HHS Guidance on the Use of Social Security Numbers (SSNs) and Citizenship Status Verification

[LIHEAP IM 1998-25](#)

Interpretation of “Federal Public Benefits” under the Welfare Reform Law

[LIHEAP State Plan](#)

Detailed Model Plan (LIHEAP), FFY 2025

V. DEFINITIONS

Applicant: A person who is 18 years or older requesting LIHEAP benefits. An Applicant may either be an Eligible Household Member, or an ineligible household member acting on behalf of at least one (1) Eligible Household Member.

Arrearages: An unpaid, past-due bill for Energy Utilities.

Benefit Matrix: A point system that outlines the LIHEAP benefit amount available to different households based on required factors including household income, household size, household vulnerability composition, and energy burden.

Categorical Eligibility: A determination that a Household meets income eligibility for LIHEAP assistance based upon one (1) or more Household member’s active enrollment in either DES Cash Assistance (CA) under Temporary Assistance for Needy Families (TANF) or DES Nutrition Assistance (NA) under the Supplemental Nutrition Assistance Program (SNAP).

Community Navigator: Local, partner agencies that provide Applicants with assistance in understanding available benefits, completing LIHEAP applications, and providing Applicants with certain specific benefits. Applicants may, but are not required to apply for

LIHEAP assistance through a Community Navigator. Certain Community Navigators may be delegated by DES to adjudicate LIHEAP applications in their service area.

Crisis: An urgent situation that requires more immediate heating and cooling intervention. A crisis benefit cannot exceed \$500. An Applicant may receive only one (1) Crisis benefit per Eligibility Period. There are two types of Crisis Assistance: Regular or Life-Threatening Crisis Assistance.

Disability: A physical or mental impairment that substantially limits at least one major life activity or a record of such an impairment, as defined by the Americans with Disabilities Act (ADA). For the purposes of this Policy, a recipient of benefits under Title II or XVI of the Social Security Act, or other State-administered disability benefits, is considered to categorically meet this definition.

Eligible Household Member: A member of a Household that is a U.S. citizen or Qualified Noncitizen (See *also*, “Eligible Participant”).

Eligibility Period: The 12-month period for which an Applicant is eligible for an annual Standard and Crisis LIHEAP benefit. The Eligibility Period begins on the date the Applicant’s Standard LIHEAP benefit is approved, and extends for 12 months (365 days) from the approval date.

Employee: Any full-time or part-time worker, or temporary paid or unpaid worker, who is employed directly by DES.

Energy Utility: A service or Portable Fuel that provides a source of heating or cooling for a Household. Eligible Energy Utility service providers include vendors of electricity, gas, water, or portable fuel for the purposes of evaporative cooling during the months of May 1 through October 31.

Federal Poverty Level (FPL): Federal income guidelines used to assess income eligibility in relation to Household size.

Gross Income: The total Household income for all Household members before taxes and other deductions.

Household: Any individual or group of individuals who are living together as one (1) economic unit for whom residential Energy Utilities are customarily purchased in common or who make undesignated payments for Energy Utilities in the form of rent.

Ineligible Household Member: A household member who is not a U.S. citizen or Qualified Noncitizen, or who declines to provide citizenship information or verification documentation. An Ineligible Household Member may have entered the U.S. either with or without Citizenship and Immigration Services (USCIS) documentation. Nonqualified noncitizens are not eligible for LIHEAP benefits, but their income will be counted toward total Household income and they may apply on behalf of Eligible Household Members (See *also*, “Ineligible Participant”).

Low Income Home Energy Assistance Program (LIHEAP or Program): The DES Program, administered by the Child and Community Services Division (CCSD or Division) that provides heating and cooling Energy Utility assistance to eligible Arizona Households.

Mixed-Status Household: A Household in which one (1) or more individuals are Eligible Household Members and one (1) or more individuals are not.

Portable Fuel: Energy that is derived from propane, wood, coal, fuel for gas generators, and/or pellets.

Qualified Noncitizen: A “qualified alien” as defined by the *Personal Responsibility and Work Opportunity Reconciliation Act of 1996* ([Pub. L. 104-193, 8 U.S.C. § 1641\(b\)](#)), see also, [LIHEAP IM 1998-25 on Interpretation of "Federal Public Benefits" Under the Welfare Reform Law](#)), who is not a citizen of the United States but is eligible for state and local public benefits programs based upon enumerated criteria. Qualified Non-Citizens may fall into any of the following categories: Lawful/legal permanent residents; asylees; refugees; noncitizens paroled in the U.S. for at least one (1) year; noncitizens whose deportations are being withheld; noncitizens granted conditional entry (prior to April 1, 1980), battered noncitizen spouses, battered noncitizen children, the noncitizen parents of battered children, and children of battered parents who fit certain criteria; Cuban/Haitian entrants; Compacts of Free Association citizens lawfully residing in the U.S.; or victims of a severe form of trafficking.

Senior Utility Assistance Program (SUAP): Assistance that requires an Applicant to have received Standard LIHEAP benefits and, upon recertification of the Standard benefit, meet specified requirements for age and receipt of state or federal benefits. SUAP recipients receive maximum Standard LIHEAP benefits.

Standard LIHEAP: Assistance that requires basic eligibility requirements be met and calculated based on the Benefit Matrix. This assistance is distinct from Crisis Assistance.

State Median Income (SMI): Guideline used to assess income eligibility in relation to Household size.

Vendor: A company that delivers fuel in bulk or sells portable energy, such as oil, liquid gas, wood, pellet, etc., or provides electricity or natural gas continuously via wire or pipes.

Valid Application: A completed application that is signed by the applicant.

Welfare Fraud: As defined by A.R.S. § 46-215(A), “A person commits Welfare Fraud if the person knowingly obtains by means of a false statement or representation, by impersonation or by other fraudulent device any of the following:

1. Assistance or service to which the person is not entitled.

2. Assistance or service greater than that to which the person is entitled.
3. Payment of any forfeited installment grant, or aids and abets in buying or in any way disposing of the property of a recipient of assistance or service without the consent of the department.”

VI. STANDARDS

A. Eligibility for LIHEAP

1. An Applicant must require assistance with payment of energy-related expenses. Expenses include:
 - a. Approved Energy Utility fees and costs, including:
 - i. Bills;
 - ii. Deposits and connection fees;
 - iii. Arrearages; and
 - iv. Restoration of Energy Utility services (including payment of reconnection charges, fees, and penalties).
 - b. Temporary Emergency Shelter if necessary due to a county-declared energy-related crisis.
 - i. Regular LIHEAP eligibility and documentation requirements are not necessary to receive Temporary Emergency Shelter assistance.
 - c. Water bills related to evaporative cooling for bills incurred during the period of May 1 through October 31.
2. An Applicant living in subsidized housing, and receiving an Energy Utility allowance or reimbursement greater than or equal to their monthly Energy Utility cost, is not eligible for LIHEAP assistance.
3. An Applicant, or a Household member, must be an Eligible Household Member. The *Personal Responsibility and Work Opportunity Reconciliation Act of 1996* limits eligibility for benefits to citizens and Qualified Noncitizens, and prohibits benefits to other noncitizens, including nonimmigrants (or temporary residents) or undocumented immigrants.
4. The Applicant and Household must reside within Arizona at the time of application.
5. Members of Tribal nations
 - a. Are eligible to apply for LIHEAP assistance if they have first applied for benefits with their Tribal nation and are:

- i. Denied benefits; or
- ii. Approved for benefits, but have a remaining utility balance.
- b. A Household may not receive LIHEAP benefits for costs already paid by their Tribal nation (see *also* Section VI(A)(7).
- c. If verification of the Tribal nation LIHEAP assistance application is not available to the Applicant, the EAP-1004A Applicant Statement of Tribal LIHEAP Denial form may be used.

6. Income

- a. A Household must either meet Categorical Eligibility or Income Eligibility requirements for the purposes of verifying Household income.
- b. Categorical Eligibility
 - i. Eligible Household Members listed on an application will be screened for Categorical Eligibility. If one (1) Household member's current enrollment in Cash Assistance or Nutrition Assistance is verified, the Household will be considered categorically eligible.
 - A) Categorical Eligibility exempts the Household from [Verification of Income](#) requirements, however, the Household must still meet and validate all other eligibility criteria to receive LIHEAP benefits.
 - B) Validation of Categorical Eligibility will be retained in the application file as substitution for Verification of Income.
 - C) A Household that is Categorically Eligible may request their application be verified using Income Eligibility if the Household has experienced a reduction in Household Income.
- c. Income Eligibility
 - i. When Categorical Eligibility does not apply, the Household's Gross Income must be at or below the greater of:
 - A) 60% of the SMI; or
 - B) 150% of the FPL.

Note: See Appendix 1 for current SMI and FPL calculations.

- ii. Households who qualify based on Income Eligibility must provide [Verification of Income](#).
- d. In Mixed-Status Households:
 - i. Only Eligible Household Members will be considered as part of the Household size; and
 - ii. Income from all Household members aged 18 and older - regardless of eligibility - is considered Household income.
- e. Countable Income for the purpose of determining eligibility for LIHEAP.
 - i. Applicants must provide income verification for the 30 day period prior to and including the date of application.
 - ii. Forms of Countable Income include:
 - A) Earned income from employment, including self-employment (includes wages, salaries, tips, etc.) as evidenced by a 1099 tax form, pay stubs, Schedule C (Form 1040);
 - 1) Self-employed applicants may submit verification of earned income from self-employment using the full calendar month preceding the date of the application.
 - B) Unearned income, including SSA and TANF benefits, alimony, child support, gambling profits, and retirement income;
 - C) Income from Unemployment Insurance;
 - D) Consistent income received from other sources; and
 - E) Income from Household members under the age of 18 is not considered Countable Income.
 - F) For the full list of earned and unearned, countable, and uncountable income, please refer to section 1.9 of the [Arizona LIHEAP State Plan](#).
- f. Verification of Terminated Income
 - i. When job termination is reported to have occurred within 30 days of, and including, the date of application, verify the following:

- A) The date of termination; and
 - B) All gross income received in the 30 calendar days prior to and including the date of the application; and
 - C) The last payday and the gross amount paid.
7. A Household may not receive LIHEAP benefits for costs already paid by any other assistance program.
8. An Applicant may also be eligible for Crisis Assistance and receive additional, expedited benefits under certain urgent circumstances. Crisis Assistance is limited to one (1) payment per 12 months, based on the Household's Standard LIHEAP eligibility period. Applicants approved for LIHEAP Crisis Assistance will receive a single benefit of \$100 to \$500, based upon Household need. Crisis Assistance can be categorized as either a Regular or Life-Threatening Crisis.
- a. Regular Crisis Assistance may be provided if the Applicant meets all standard eligibility criteria and one of the following conditions:
 - i. The Household has received an Energy Utility shut-off or delinquency notice;
 - ii. The Standard LIHEAP benefit does not pay the full amount of the Applicant's bill;
 - iii. The Household has received an eviction notice, if Energy Utilities are included in the rent; or
 - iv. The Household utilizes portable fuel or a pre-pay Energy Utility service and has seven (7) days or less of portable fuel or energy service available.
 - b. Life-Threatening Crisis Assistance may be provided if the Applicant meets all standard eligibility criteria and one of the following conditions:
 - i. The termination of power or exposure to heat or cold would be dangerous to the health of a Household member; or
 - ii. Life-supporting equipment used in the home is dependent upon Energy Utility service for the operation of such equipment.

B. LIHEAP Benefits

1. Standard LIHEAP Assistance

Payments will be calculated using the LIHEAP Heating/Cooling Benefit Matrix as set by the current LIHEAP State Plan. An Applicant's benefit will be based on the Household's:

- a. Income;
- b. Size;
- c. Energy burden; and
- d. Whether any one or more of the following Household members are:
 - i. Aged six (6) and under;
 - ii. Aged 60 and over;
 - iii. A veteran; or
 - iv. A person with a disability.

2. Regular Crisis Assistance and Life-Threatening Crisis Assistance

Payments will be calculated based on the requested need, up to the maximum crisis benefit available as set by the current LIHEAP State Plan. Standard LIHEAP assistance must be exhausted for Applicants to receive Crisis Assistance.

3. Use of Funds

LIHEAP funds will be distributed in accordance with federal law and the Arizona LIHEAP State Plan, Sections 2-5. LIHEAP recipients may only utilize LIHEAP benefits for their approved purposes; fraud and improper use of funds may result in denial of benefits, LIHEAP disqualification, or criminal prosecution.

C. Prudent Decision-Making Principles

1. The policies and procedures included in this LIHEAP Policy compile and prescribe guidance for determining eligibility, delivering benefits, and administering the Program. Employees and Community Navigators will use reason and apply good judgment in making decisions when addressing specific needs or scenarios of an Applicant or Household not specifically addressed by this Policy or referenced Authority. Decision-making by Employees based on the best information available, program knowledge, experience, and expertise is referred to as the Prudent Decision-Making Principle. Prudence may also include seeking CCSD or DES guidance on specific Program or policy interpretation. Employees should document their

rationale used to make decisions not contemplated by this Policy or Authority, and cite any applicable references.

D. Policy Administration

1. Updates and/or amendments to this Policy will be issued as complete numbered revisions, superseding this Policy, in conjunction with any relevant Policy Memorandum summarizing changes.
2. Minor clarification to this Policy may be issued in the form of Policy Memoranda, providing interim guidance between revisions.
3. Questions or requests for clarification regarding this policy should be submitted via email to:

dcadcaps@azdes.gov, and
dcadpolicy@azdes.gov

Subject: LIHEAP Policy Questions & Clarifications

Please include your name, a contact phone number, and details regarding your inquiry.

VII. PROCEDURES

A. Application Process

1. Application Requirements

An application must contain the following information for DES to make an eligibility determination. The Applicant has the primary responsibility for providing all required information:

- a. Verification of U.S. Citizenship or Qualified Noncitizen Status

- i. An Applicant who submits an application on or after November 25, 2024, must provide the citizenship or immigration status for each Eligible Household Member or submit documentation demonstrating either U.S. citizenship or Qualified Noncitizen status (see [A.R.S. 1-504](#)).

- A) Any Household member without demonstrated citizenship or qualified non-citizen status will be treated as an Ineligible Household Member.

- B) An ineligible household member may apply for benefits on behalf of Eligible Household Members.

- C) DES will conduct an immigration check in the U.S. Citizenship and Immigration Services (USCIS) SAVE database for any

Eligible Household Member that is not a citizen of the United States, as required by A.R.S. § 1-504.

- 1) To be approved for LIHEAP benefits, these Applicants must have Qualified Noncitizen status validated through a SAVE check.
- 2) Standard Crisis and Life-Threatening Crisis Applicants who meet all other eligibility criteria but who cannot be validated in SAVE within 48 hours or 18 hours, respectively, will be approved subject to redetermination of benefits following validation.
- 3) This check is required only for Applicants and households that are otherwise eligible; it is not required if an Application is determined to be ineligible based upon other eligibility criteria.

NOTE: If an Applicant or Household was previously denied on other criteria, and is later determined to be eligible, a check is required prior to approval if not already completed for any Eligible Household Member that is not a citizen of the United States.

- ii. The Non-Citizen Script must be read to an Applicant, prior to advising the Applicant or adding a non-citizen Household member to the application, when the application contains:
 - A) A non-citizen that does not want to provide non-citizen status; or
 - B) A non-citizen that does not possess documentation to verify non-citizen status
 - iii. Accepted forms of documentation to establish U.S. citizenship or Qualified Noncitizen status are outlined in the [CCSD Citizenship Verification Documentation Policy](#).
- b. Proof of Arizona Residency
- i. An Applicant must submit documentation demonstrating Arizona residency. Forms of documentation include:
 - A) An Energy Utility bill;
 - B) Lease agreement;
 - C) Mortgage statement;

- D) Driver's license or state-issued identification; or
 - E) Any other documentation that demonstrates an Arizona address.
- ii. An Employee must handle Address Confidentiality Program (ACP) participant information according to *Address Confidentiality Program Policy and Procedures* (DES 1-01-45, DES 1-01-45-01), and [DCAD Address Confidentiality Program Policy](#).
- c. Verification of Income
- i. Verification of income is required for any Household that qualifies based on Income Eligibility; Households that qualify based on Categorical Eligibility are exempt from this requirement.
- A) If a Categorically Eligible Household has experienced a reduction in Household Income, Income Eligibility and Verification of Income may be used to validate the Household's current Income at the Applicant's request.
- ii. An Applicant must provide income information, and submit verification of income, for all Household members with income ages 18 and older. Income includes all earned and unearned income of any Household member for the 30 days prior to and including the date of application, including but not limited to:
- A) Employment payments as indicated on a W2, 1099, tax documents, or pay stubs;
- B) Profit or loss documentation from self-employment or sole-proprietorship, as indicated on a Schedule C (Form 1040) or Self-Employment Income Statement form ([DCAD-1004A](#) & [DCAD-1004A-S](#));
- 1) Self-employed applicants may submit verification of earned income from self-employment using the full calendar month preceding the date of the application.
- C) Unemployment Insurance benefits;
- D) Social Security, Veterans Administration, or retirement benefits;

Note: Medicare Part B premiums should be subtracted when determining gross income.

- E) Alimony, spousal maintenance, child support, or other such income; or
 - F) Other monies coming into the Household.
- iii. Documentation showing that the Household's monthly income is less than 60% of the SMI or 150% of the FPL (whichever is greater, see Appendix A). Documentation may include:
- A) The most recent pay stubs for 30 days prior to and including the date of application;
 - B) Tax Documents for the previous calendar year; or
 - C) Award Letters (e.g., SSI, SSDI, or Social Security).
- iv. If an Applicant does not have the most recent pay stubs for all members of the Household, the Applicant shall provide other evidence of income amounts for all Household Members who receive income.
- v. Household monthly income for the purpose of determining eligibility and benefit amount is calculated using the following formula:
- A)
$$\left(\frac{\text{[Average Gross Income per Pay Period X Income Frequency]}}{12} \right)$$
 - 1) "Frequency" refers to the frequency of income payment(s) received (e.g. annually [1], weekly [52], monthly [12], etc.). This is selected by the Applicant during the application process when reporting household income.
- d. Current bill(s), invoice(s), shut-off notice, or other evidence of the Energy Utility account status in the Applicant's name or a member of the Household.
- i. Documents are current if dated 30 calendar days prior to and including the application date.
 - ii. If an Applicant or Household member's name is not listed on the Household Energy Utility bill, additional verification of the Applicant's obligation to pay for the Energy Utilities may be required.

- iii. For Households utilizing and seeking Portable Fuel assistance, an Applicant may provide self-certification using the EAP-1006A LIHEAP Portable Fuel Certification form, solely to evidence Portable Fuel requirements. Self-certification for Portable Fuel will require the following information:
 - A) Total requested Portable Fuel and estimated cost;
 - B) Type(s) of heating/cooling generation source(s) using Portable Fuel (specifying size, make/model as applicable);
 - C) Specific type(s) of Portable Fuel required (e.g. propane, wood, gasoline);
 - D) Estimated monthly Portable Fuel use per type;
 - E) Estimated cost of Portable Fuel per unit (e.g., per sold gallon, weight). The cheapest available Portable Fuel of its type will be used, absent specific justification; and
 - F) Amount of any Portable Fuels currently owned and available for use by the Household.
- e. Proof of Veteran status (if applicable), as evidenced by a copy of any of the following:
 - i. DD-214;
 - ii. Military or veteran identification card;
 - iii. Veteran Health Identification Card; or
 - iv. Department of Veterans Affairs Discharge Certification Letter.
- f. Self-Certification of the following:
 - i. The Household did not receive any other assistance for the same energy cost;
 - ii. Disability status (if applicable);
 - iii. Statement of Tribal LIHEAP Denial (if applicable); and
 - iv. The truth and accuracy of information submitted in the application.
- g. Crisis Assistance (as applicable):
 - i. Proof that Standard LIHEAP benefits have been exhausted on Energy Utility expenses; and

- ii. Proof of Regular Crisis or Life-Threatening Crisis, evidenced by:
 - A) For Regular Crisis:
 - 1) An Energy Utility shut-off or delinquency notice;
 - 2) An eviction notice, if Energy Utilities are included in the rent;
 - 3) Collateral contact with energy Vendor to verify crisis status;
 - 4) Documentation showing that the Household has less than seven (7) days of prepaid Energy Utility services left; or
 - 5) Self-certification that the Household has less than seven (7) days of Portable Fuel.
 - B) For Life-Threatening Crisis:
 - 1) Self-certification stating that an Energy Utility shut-off would be dangerous to the health of a Household Member; or
 - 2) Self-certification stating that life-supporting equipment is used in the home and the equipment is dependent upon Energy Utility service for operation.
- h. Data Collection. Certain information is required to be collected per federal guidelines, including:
 - i. Demographic information of the primary Applicant, including race, ethnicity, veteran status, and sex. There is a “choose not to answer” option for all demographic data collection elements.
 - ii. LIHEAP Performance Measures information, including vendor information, household size, fuel type, primary heating type, and annual household income. See performance measures guideline [LIHEAP Performance Measures Data Collection Guide](#).

2. Application Submission and Verification of Identity

Applicants seeking Standard LIHEAP assistance and/or Crisis Assistance may apply for LIHEAP through any of the following methods. To prevent fraud, an Applicant must verify their identity.

- a. By completing an application online through the LIHEAP Portal at <https://era.azdes.gov/>;
 - i. When applying online, an Applicant must verify their identity through ID.me at <https://www.id.me/>. Use of ID.me will require a Social Security Number (SSN) or Taxpayer Identification Number (TIN).
 - A) An Applicant's disclosure of their SSN or TIN is optional and is used to verify the Applicant's identity and assist in the timely processing of the application.
 - B) If an Applicant wishes not to disclose their SSN or is otherwise unable to verify through ID.me, they may submit a paper application and provide identity documents. This method may lengthen processing time.
- b. By providing a paper application to, or completing an online application with a Community Navigator;
 - i. When applying with assistance from a Community Navigator, an Applicant is required to provide identification documents. Identification documents may include:
 - A) State-issued ID;
 - B) Driver's license;
 - C) Birth Certificate;
 - D) Passport; or
 - E) Any other documentation that can demonstrate a person's identity.
 - ii. For all paper applications, the application date is the day it is received by DES.
- c. By submitting a Valid Application to DES via:
 - i. Fax to (602) 612-8282;

A) For faxed applications, the application date is the date of receipt by DES (as annotated on the fax cover letter).

ii. Mailing the application to:

Department of Economic Security
Low-Income Home Energy Assistance Program
PO Box 19130 Phoenix, AZ 85009-9998

A) For mailed applications, the application date is the day it is received by DES.

3. Recertification

a. Eligibility for Recertification

i. Applicants are eligible to apply to recertify for LIHEAP 11 months from the approval date of their LIHEAP Standard application.

ii. Senior Utility Assistance Program (SUAP)

Eligible senior Applicants may apply for SUAP when recertifying for LIHEAP benefits. SUAP recipients are eligible to receive the maximum Standard LIHEAP benefit.

A) To be eligible to recertify under SUAP:

1) All adult Household members must be 60 years of age or older or 17 years of age or younger; and

2) One (1) Household member must either:

a) Be the current recipient of Federal or State benefits;

b) Have expenses related to Medicare; or

c) Receive Social Security or Social Security Disability income.

b. Applying for Recertification

i. Recertifications must be submitted:

A) By completing an application online through the LIHEAP Portal at <https://era.azdes.gov/>; or

B) By completing an online application with a Community Navigator.

- ii. Recertification applications will automatically carry over all prior Applicant Household information for the purposes of the application. Applicants must:
 - A) Verify that all information is current and accurate, or provide updated information;
 - B) Provide the most recent cost of Energy Utilities, for 30 days prior to and including the date of application (this information will not be carried over from a prior application);
 - 1) SUAP Applicants may certify there have been no changes in their utilities.
 - C) Provide any documentation required for the application that is missing or not current; and
 - D) Sign and submit the application.
- iii. All Application Requirements, including Application Submission and Verification of Identity provisions, apply to recertification applications:
 - A) To recertify, all Household members must have [Verification of U.S. Citizenship or Qualified Noncitizen Status](#).
 - 1) Any applicant for recertification must provide the citizenship or immigration status for each Eligible Household Member or submit documentation demonstrating either U.S. citizenship or Qualified Noncitizen status, if not previously provided.
 - 2) During recertification, DES will conduct an immigration check in the USCIS SAVE database for any Eligible Household Member that is not a citizen of the United States, as required by A.R.S. § 1-504.
 - a) To be approved for LIHEAP benefits, these Applicants must have Qualified Noncitizen status validated through a SAVE check.
 - b) This check is required only for Applicants and households that are otherwise

eligible; it is not required if an Application is determined to be ineligible based upon other eligibility criteria.

4. Application Processing

a. Adjudication Timelines

- i. Standard LIHEAP applications will be processed within thirty (30) calendar days, from the date an application is received in person, online, by mail, or by fax.

Note: This time does not include any days during which an incomplete application was returned to an Applicant for processing.

- ii. Crisis LIHEAP applications will be processed as soon as possible, but no later than 48 hours for Regular Crisis applications and no later than 18 hours for Life-Threatening Crisis Applications, from the time an application is received by DES until a payment is issued.

b. Community Navigators

- i. Provide integral support to the LIHEAP program to ensure applicants have an option for local, in-person LIHEAP resources. Further, Community Navigators enhance the availability of LIHEAP, and improve the quality of applications to streamline adjudication and determination of benefits.
- ii. Work through state-designated Community Action Agencies (CAA) or other community partners to perform outreach in accordance with contractual agreements.
- iii. Perform appointments with Applicants for services as soon as practicable and in accordance with contractual requirements. Navigators must screen for crisis circumstances and priority will be given to Crisis Assistance Applicants.
- iv. Receive applications and requests for application services from Applicants. Specifically, Community Navigators:
 - A) Ensure an application complies with the requirements of this policy, including necessary documentation to make an eligibility determination;
 - B) Assist the Applicant in locating and submitting an application and/or related application document(s); and

- C) Comply with all applicable Community Navigator and DES training, contractual agreements, laws, and regulations in providing services.
 - v. Submit complete LIHEAP applications to DES within one (1) business day.
 - vi. Conduct initial screening and reporting of potential Welfare Fraud.
 - A) For additional guidance on Welfare Fraud, please refer to Section VII, Subsection E of this policy.
 - vii. May adjudicate and make determinations on LIHEAP applications submitted in their service area, as delegated by DES, and in accordance with applicable law, the Arizona LIHEAP State Plan, this Policy, and the terms and conditions of any applicable contract.
- c. DES, CCSD
 - i. Receives and adjudicates applications in accordance with applicable law, the Arizona LIHEAP State Plan, and this Policy.
 - A) Applications may be received online or on paper; any form of application type may be submitted directly to CCSD, or through or in coordination with a Community Navigator.
 - ii. Contracts with CAAs and community partners for navigator and outreach services.
 - A) DES may delegate certain Community Navigators to adjudicate LIHEAP applications in their service area.
 - iii. Notifies Applicants of adjudication decisions, and disburses approved Applicant benefits to Vendors or Applicants. See para. VII(B)(3).
- d. Incomplete Applications
 - i. When received or reviewed by a Community Navigator, the Community Navigator will make the best attempts to resolve incomplete applications with the Applicant prior to submission of the application and within prescribed timelines.

- A) For example, the Community Navigator may request any missing information or assist the applicant in locating missing documentation.
- ii. When incomplete applications are received by adjudicators, and as a result an eligibility determination is unable to be made, the application will be placed in a 'needs information' status. An email notice will be sent to the Applicant explaining the information or documentation that is required to complete the application for an eligibility determination to be made.
 - A) Incomplete applications cannot be acted upon by DES until Applicants provide the required information/documentation to complete their application.
 - B) After an application is placed in 'needs information' status and an Applicant is notified of missing information/documentation, the Applicant will be provided 45 days to complete the application.
 - C) Applications that remain in a 'needs information' status for more than 45 days will be denied as incomplete and/or missing required documentation. The Applicant may reapply.
- e. Verification of Discrepancies
 - i. If any discrepancies are discovered during the adjudication of an application, adjudicators may request additional documentation from the Applicant or other Household Members to verify the information needed to issue an eligibility determination.
 - ii. When all other means of verification have been exhausted, client statements shall be used to the extent permitted by this policy.
 - A) Collateral contacts shall be conducted by adjudicators to attempt to verify the information prior to using a client statement.
- f. Conflicts of Interest

An Employee or Community Navigator may not process a LIHEAP application submitted by any person, or which pertains to a Household member, that the Employee or Community Navigator

knows or otherwise has a personal relationship with, including a friend, neighbor, relative, or other individual. Any such relationship, which may raise a question of the Employee or Community Navigator's impartiality, must be avoided.

- i. Any adjudicator who identifies a Conflict of Interest in an application (e.g. with an Applicant, member of the Applicant's Household, or other information) will notify their immediate supervisor and take no action on the Applicant's case. The supervisor will then transfer the application to another adjudicator within one (1) business day for continued processing.

B. Authorization of Benefits

1. Benefit Calculations

- a. Standard LIHEAP benefits will be calculated using the LIHEAP Heating/Cooling Benefit Matrix as set by the current LIHEAP State Plan (See *also* [LIHEAP Benefits](#)). The Department may authorize up to \$640 for a standard LIHEAP payment.
 - i. This payment may be provided to approved Applicants one (1) time within the Eligibility Period (For example, see "Benefit Limits" below). The payment may be used to:
 - A) Pay Energy Utility bills;
 - B) Pay Energy Utility deposits and connection fees;
 - C) Pay Arrearages; and
 - D) Restore Energy Utility services (including payment of reconnection charges, fees, and penalties).
- b. The Department may authorize up to an additional \$500 for a Crisis Assistance payment.
 - i. Crisis Benefit Calculation
 - A) Crisis Assistance payments start at a minimum \$100 benefit.
 - B) Any additional Crisis Assistance benefit is based on Household need.
 - ii. This payment may be provided one (1) time within the Eligibility Period, and

- iii. The applicant has exhausted their standard LIHEAP benefit. A Standard LIHEAP benefit is exhausted when:
 - A) The Standard LIHEAP benefit is not enough to cover the outstanding amount due at the time of approval (in this case, Crisis LIHEAP payment may be made at the same time as an approved Standard LIHEAP payment); or
 - B) The Applicant was previously approved for, and has since exhausted, their full standard LIHEAP benefit.

c. Benefit Calculation for Categorical Eligibility

- i. Households with Categorical Eligibility status are exempt from Verification of Income requirements at the time of application. These Households will have benefits calculated using the reported income of the Household member who is actively enrolled in Cash Assistance or Nutrition Assistance.
 - A) If a Household member is actively enrolled in multiple qualifying programs and different incomes are reported, the higher reported income will be used.
- i. If a household is categorically eligible based on enrollment in Cash Assistance, the Household income will include both the Household's reported income plus the Cash Assistance benefit.
- d. LIHEAP assistance payments are not considered Household income.
- e. A Household's participation in LIHEAP must not adversely impact the Household's eligibility for other public assistance programs provided by DES.

2. Decision Notices

- a. DES will issue decision notices to Applicants via email through the LIHEAP Portal.
 - i. Approval Notices. Approval notices will be issued when the decision is made to grant benefits. An approval notice will include:
 - A) the date of the decision;
 - B) the amount of the benefit;

- C) the Applicant's right to request Administrative Review of the decision; and
 - D) the Applicant's right to appeal.
 - ii. Denial Notices. Denial notices will be issued when the decision is made to deny benefits due to ineligibility, missing documentation, or another reason. A denial notice will include:
 - A) the date of the decision;
 - B) the basis for the denial;
 - C) the Applicant's right to request Administrative Review of the decision; and
 - D) the Applicant's right to appeal.
 - iii. Updated Notices. If a subsequent DES decision is made affecting an Applicant's existing benefits eligibility or amount, an updated notice will be provided. Updated notices will include the same information as prior approval or denial notices.
- 3. Payment Issuance
 - a. The Department will:
 - i. Issue a LIHEAP payment directly to an energy Vendor via Electronic Fund Transfer (EFT) or check.
 - ii. Issue a payment directly to the Applicant when:
 - A) Payment cannot be made directly to the energy Vendor.
 - B) An Applicant's Energy Utilities are included within the cost of their rent.
 - C) The Applicant household's energy utility charges are billed to a single account that includes multiple addresses, the applicant must:
 - 1) Verify the Applicant's household address and residency, as contained on the Energy Utility bill, with independent documentation, if not already provided;
 - 2) Self-certify that the Applicant's household will not receive payment from any other source for

Energy Utilities for which they are applying for LIHEAP benefits; and

3) Provide proof of obligation to pay the Energy Utilities billed to the household (e.g., a rent or lease agreement).

iii. Issue a Notice of Payment Letter directly to an energy Vendor or Applicant for a Crisis within 48 hours.

b. Any payment made to a bank account or a mailing address outside the United States is subject to an additional review before processing.

c. Any LIHEAP payment received by the energy Vendor under this section will be used to satisfy all or a portion of the Household's Energy Utility bill.

4. Benefit Limits

a. An eligible Household will not receive Standard LIHEAP payments in excess of \$640 per every 12 months from the eligibility date.

b. An eligible Household will not receive Crisis LIHEAP payments in excess of \$500 per every 12 months from the Standard LIHEAP eligibility date.

c. Eligible SUAP participants will qualify to receive the maximum standard LIHEAP benefit of \$640 per every 12 months.

d. A Household approved for LIHEAP benefits:

i. Is eligible to recertify for LIHEAP benefits under a new eligibility period 11 months from the approval date of their previous application with reduced documentation (See [Applying for Recertification](#)); and

ii. Is eligible to receive benefits under a new eligibility period 12 months from the approval date of their previous application.

e. Example. Applicant A applies for LIHEAP benefits on November 1, 2022, and their application is approved on November 4, 2022. Applicant A's 12-month Eligibility Period begins on November 4, 2022, and they may recertify for Standard LIHEAP on October 4, 2023 after 11 months. Applicant A is eligible to receive a new period of LIHEAP benefits beginning November 4, 2023

C. Grievances

1. Applicant grievances will be processed in accordance with the [CCSD Grievances Policy](#).

D. Program Monitoring

1. Program monitoring generally consists of evaluations of internal processes and procedures for compliance with all requirements of federal, state and local laws, LIHEAP contracts, and this Policy.
 - a. CAAs will be monitored a minimum of once every three (3) years, focusing on program, fiscal, policy, general contract, and navigator model compliance. Monitoring will be performed in accordance with the LIHEAP State Plan, Section 10.
 - b. DES will complete internal case audits on a monthly basis to ensure accurate determinations are made.
 - i. LIHEAP employees with adjudicator supervisory authority will complete initial monthly case audits.
 - ii. Second-level audits will also be completed to ensure the quality and accuracy of the monthly audit process. Second-level audits will be completed on no less than a quarterly basis, by a LIHEAP employee with adjudicator supervisory authority.
 - c. Arizona Auditor General's Office. Audits LIHEAP in its audit of program expenditures in accordance with the Single Audit Act of 1984.

E. Welfare Fraud Prevention and Penalty

1. LIHEAP adjudicators will take multiple steps to detect and prevent instances of Welfare Fraud. Specifically, adjudicators will review the energy bill and other associated documents and evidence for signs of fraud.
2. Applicants are required to attest they are not receiving benefits under LIHEAP for energy or Energy Utility expenses already paid by any other assistance program. Providing false statements may be punishable by law and/or result in denial or disqualification from LIHEAP benefits.
3. In cases where potential Welfare Fraud is detected, adjudicators will document the suspected nature of the fraud, any relevant information (e.g., known facts, statements, witnesses, or other knowledge possessed by the employee regarding the matter) and refer the matter to the Office of the Inspector General for investigation.

4. When Welfare Fraud is detected, external parties shall:
 - a. Call the DES Fraud Hotline at (800) 251-2436; or
 - b. Complete the online form at <https://des.az.gov/report-fraud/report-suspected-fraud>
5. If DES determines that an Applicant has committed an intentional program violation or defrauded LIHEAP, the Applicant will be subject to denial of LIHEAP benefits, disqualification from the Program, and criminal prosecution.
 - a. Applicants are subject to 12-month disqualification for a 1st violation, 24-month disqualification for a 2nd violation, and permanent disqualification for a 3rd violation.

F. Confidentiality

1. All personally identifiable information concerning any applicant for benefits, or claimant for any grievance, is confidential under A.R.S. § 41-1959 unless such confidentiality is waived or otherwise provided by law.
2. The U.S. Treasury, Office of Inspector General, U.S. Department of Health and Human Services, and the U.S. Government Accountability Office, or authorized representatives of either, shall have the right of access to confidential records to conduct audits or investigations.

G. Records Retention

1. DES and Community Action Agencies shall maintain a copy of all records for at least three (3) years from the date of the submission of the quarterly or annual financial report as reported to the HHS awarding agency or pass-through entity in the case of a subrecipient, in accordance with 45 C.F.R. 75.361.
2. DES shall maintain records including financial documents and documents pertaining to eligibility determinations.

APPENDIX 1 - Income Eligibility by Household Size

Household size	Monthly Gross Income Limit
1	\$2,646
2	\$3,460
3	\$4,274
4	\$5,089
5	\$5,903
6	\$6,717
7	\$6,870
8	\$7,022
9	\$7,262
10	\$7,935
11	\$8,607
12	\$9,280
13	\$9,952
14	\$10,625
15	\$11,297
EACH ADDL OVER 15	EACH ADDL
	\$672