

**REPORT OF THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**

**THE STRUCTURE FOR THE
EFFECTIVE DELIVERY OF
LOW INCOME HOME ENERGY
ASSISTANCE PROGRAM SERVICES**

**TO THE GOVERNOR AND
THE GENERAL ASSEMBLY OF VIRGINIA**



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COMMONWEALTH of VIRGINIA

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

January 7, 1999

James S. Gilmore, III
Governor

Barry E. DuVal
Secretary of
Commerce and Trade

William C. Shelton
Director

TO: The Honorable James S. Gilmore, III, Governor of Virginia
and
Members of the Virginia General Assembly

The 1998 General Assembly, through House Bill 1103, directed the Department of Housing and Community Development to coordinate efforts to study "the structure for the effective delivery of Low Income Home Energy Assistance Program Services (LIHEAP)." The bill directed the Department to coordinate this study with the Virginia League of Social Services Executives, Inc., the Virginia Council Against Poverty, and the Association of Energy Conservation Professionals. The bill also requested the assistance of the Department of Social Services. The study was included consideration of coordination among local weatherization providers, local community action agencies, and local social service agencies as well as the possibility of developing LIHEAP-funded programs that encourage greater self-sufficiency. To assist in formulating the specific issues reviewed in the study, the Department convened a study group consisting of members of the organizations included in the bill. The contributions of the members of the study group are gratefully acknowledged.

The accompanying report, which is presented for your review and consideration, has been prepared in response to the requirements of HB 1103.

Respectfully submitted,

William C. Shelton



PREFACE

During the 1998 session, the General Assembly passed HB1103, which Governor Gilmore signed into law as Chapter 693 of the Acts of Assembly. This bill amended Chapter 495 of the 1996 Acts of Assembly to direct the Department of Social Services (DSS) to allocate at least fifteen percent of its low-income fuel assistance program funding to weatherization assistance programs. It also assigned to the Director of the Department of Housing and Community Development (DHCD) responsibility for the administration of these program funds. Other provisions of the bill established various requirements for coordinating the activities of the two agencies. The sixth enactment requested DHCD to “*coordinate efforts with the Virginia League of Social Services Executives, Inc., the Virginia Council Against Poverty, and the Association of Energy Conservation Professionals to study the structure for the effective delivery of Low Income Home Energy Assistance Program (LIHEAP) services. This study shall include consideration of (i) the coordination between local weatherization providers, local community action agencies, and local departments of social services and (ii) possible future programs, using LIHEAP funds, which encourage self-sufficiency by addressing the underlying contributing causes of energy induced hardships.*” The enactment also required DSS to assist the study and directed DHCD to report its findings and recommendations to the Governor and the General Assembly.

DHCD acknowledges the valuable assistance received from the following individuals: representing the Virginia Department of Social Services (VDSS) Charlene Chapman and Cathy Olivis; representing the Virginia League of Social Services Executives, Inc. (the League) Sam Bush, Kimberly Irvine, and Gloria Tuck; representing the Virginia Council Against Poverty (VACAP) Judy Mason, Rob Goldsmith, and Bob Parks; and representing the Association of Energy Conservation Professionals (AECOP) Billy Weitzenfeld, Fred Gross, and John Bodtmann.

The following DHCD staff assisted in preparing this study: Bill Beachy, Program Administrator; Ron White, Program Manager and Bill Ernst, Policy Analyst.

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EXECUTIVE SUMMARY

Chapter 693 of the 1998 Acts of Assembly directed the Department of Social Services (DSS) to allocate at least fifteen percent of its low-income fuel assistance program funding to weatherization assistance programs. The bill also requested the Department of Housing and Community Development (DHCD) to coordinate a study of the structure for the effective delivery of Low Income Home Energy Assistance Program (LIHEAP) services with other affected organizations. The study was to consider (i) the coordination between local weatherization providers, local community action agencies, and local departments of social services and (ii) possible future programs, using LIHEAP funds, that would encourage self-sufficiency by addressing the underlying contributing causes of energy induced hardships. DHCD, with DSS assistance, was to report its findings and recommendations to the Governor and the General Assembly.

The federal government established the Low-Income Home Energy Assistance Program (LIHEAP) Block Grant in 1981 as one response to the energy crisis of the late 1970s and early 1980s. The program, which aids low-income households, was designed to minimize government bureaucracy and maximize involvement by civic institutions. Over time, local and state LIHEAP providers, encouraged by Congress and the federal government, have become increasingly innovative in the areas of policy and program design, development, and implementation. However, there are differences of opinion at the national, state and local levels concerning the current best use of LIHEAP funds. The following questions summarize the varying perspectives of the major concerned parties:

- Should LIHEAP address short term versus long term needs?
- Should an administratively simple and inexpensive program design, but one that lacks on-site assessments of household circumstances, be pursued instead of one that employs on-site visits with an assessment of needs as they relate to the goals of LIHEAP?
- Should LIHEAP, and to what extent, address energy self-sufficiency through programs going beyond simply paying vendors or qualifying clients for the purchase of energy?

The federal Department of Health and Human Services (HHS), which administers the LIHEAP program, has expressed its concern about issues of coordination at the state and local level. Coordination of services is one of sixteen assurances to which a state grantee must agree as part of an application to HHS. Each of the three networks of low-income services providers represented in the LIHEAP Study Group contributes to meeting the goals in the LIHEAP statute and regulations. Convening the Study Group gave its members, and the represented organizations, a better understanding of the work each does, provided opportunities to work together

to improve local service delivery, and demonstrated the potential to work together to improve state level policy- and decision-making.

A significant number of the states are trying to address the underlying, contributing causes of energy induced hardships. The 1994 LIHEAP reauthorization included, among other changes, two new sections 2605(b)(16), Assurance 16, and 2607(b), the Residential Energy Assistance Challenge (REACH), that permit the use of LIHEAP funds for needs assessments, counseling, assistance with energy vendors, and energy efficiency education. Assurance 16 permits the use of LIHEAP funds for services that encourage and enable households to reduce their home energy needs and thus their need for energy assistance. REACH is a competitive grant program (outside the LIHEAP block grant) supporting grantee proposed projects that reduce the energy vulnerability of low-income households.

Because LIHEAP grantees have considerable discretion in interpreting the required assurances, several states have recently used this flexibility to test alternatives that could increase program effectiveness and energy efficiency. The 1993 Oak Ridge National Laboratory (ORNL) report “A Weatherization Manual for LIHEAP Policy Makers and Program Administrators” discusses several of these innovative programs. It showcases creative and productive ways states have used LIHEAP funds--combining the Department of Energy’s (DOE) Weatherization Assistance Program (WAP) and a variety of other federal, state, and utility company resources. Over the past six years, for example, Texas has used LIHEAP funds to carry out the activities of the Comprehensive Energy Assistance Program (CEAP), which encourages energy self-sufficiency by addressing the underlying, contributing causes of energy induced hardships.

Eleven issue areas identified by the Study Group participants are summarized below along with the corresponding response or recommendation from DHCD.

1. The Availability of Other (Additional) Funding Sources – The Study Group discussed options for identifying and obtaining additional resources. DHCD recommended joining with DSS in providing information that would help local service providers understand and keep current with services available through, and related to, the LIHEAP block grant.

2. Using the Same Provider of Heating Equipment Repairs/Replacement and Weatherization – The Study Group discussed the need to maintain a system *allowing* the local weatherization office to provide LIHEAP funded heating equipment repairs and replacements. DHCD indicated it would continue to give local weatherization administrators the flexibility to procure equipment and services for their clients from private vendors while maintaining a high level of quality control. It also suggested two possible options for consideration by DSS:

- Offer local DSS offices the flexibility to procure local weatherization providers as Heating Equipment Repair and Replacement (HERR) vendors or as monitors of HERR services for quality control (based on the Virginia WAP Installation Standards). HERR vendors would not be paid until the local DSS has received a signed inspection that the HERR work has been completed to the Installation Standards, or
- Allow DHCD to administer funding for heating equipment repairs and replacements to be administered through its weatherization network. This could relieve the local DSS of administrative burdens related to the Crisis Component. DHCD would support seeking a legal opinion that would allow a more reasonable time frame to respond to the loss of heat or that would permit these services to be provided on a “non-emergency” basis, not subject to a 24-48 hour period complete turnaround.

3. Increased Self-Sufficiency and Case Management – The Study Group discussed the need to consider using LIHEAP funds for case management (including client education and counseling) and assistance that would encourage and improve *energy self-sufficiency* (including increased recipient responsibility for benefits received). DHCD recommended using LIHEAP funds to develop and implement an Assurance 16-type pilot program funded with 5% of the total block grant funds received from HHS and operated by a local weatherization administrator, a local CAP, or a local DSS, currently under contract with DSS or DHCD.

4. Continuation of Services for those with the Lowest Incomes in Meeting Basic Needs –The Study Group discussed whether the clientele differed between the DOE Weatherization Assistance Program, LIHEAP Weatherization Component and other LIHEAP Components. DHCD believes that the “vulnerability” of a household is similar for WAP and LIHEAP assistance cases, regardless of whether the energy-related needs of a household involve the direct payment of an energy bill; the repair or replacement of an inefficient, unsafe (possibly life-threatening) or inoperable source of heat; or the completion of energy conservation improvements to a cold, drafty, and unhealthy dwelling. Thus, DHCD recommends that all components of LIHEAP continue to target (a) households occupied by members of a vulnerable population, (b) households who appear to have the highest energy burden (based on disposable income, the number of household members, energy costs and the condition of the dwelling), and (c) households whose “crisis” situation” can be assessed and confirmed by an on-site visit.

5. Coordination of Services and Referrals – Members of the Study Group saw a need to clarify LIHEAP guidelines, simplify procedures and, in the process, minimize confusion for applicants and local providers. Shifting state level responsibility for

LIHEAP Weatherization from DSS to DHCD should reduce problems with the coordination of services and referrals, particularly as they relate to LIHEAP Weatherization Assistance. DHCD recommends continuing to use DSS generated lists of Fuel Assistance recipients as a source of referrals to local weatherization providers for weatherization assistance

6. Assurance 16 and the Need for a Model – The Study Group discussed a need for flexibility to carry out activities allowed by Assurance 16 (e.g. needs assessments, counseling) and to develop a model or a pilot program. As in the third issue area, DHCD recommends using LIHEAP funds to develop and implement an Assurance 16-type pilot program to be operated by a local weatherization administrator, a local CAP or a local DSS.

7. Local Selection of Service Vendors – The Study Group discussed a need to allow greater local flexibility in the selection of vendors for services funded with LIHEAP monies. DHCD responded that it would be willing to consider additional local vendors for weatherization services, using the DOE considerations. A new vendor would be subject to the same payment criteria as an existing vendor--no payment will be made for work that is incomplete and has not been inspected to assure compliance with the requirements of the Virginia WAP Installation Standards.

8. Streamlining Administrative Services –Study Group members (particularly representatives of local DSS Directors) wished to see overall LIHEAP administrative costs reduced. DHCD, in general, encourages opportunities for “one-stop shopping” for customers and would consider incorporating any streamlining initiatives in its weatherization activities.

9. Electric Utility Restructuring and Deregulation – The Study Group noted the potential impact of utility restructuring and deregulation on low-income residential customers and suggested encouraging or advocating low-income residential consumer protections, benefits and education in connection with deregulation. The uncertainties of the future energy marketplace could increase the need for LIHEAP assistance. DHCD and DSS should provide whatever information state legislators need to understand the potential impact of restructuring and deregulation on LIHEAP or WAP recipients. DHCD and DSS should also help providers and recipients of low-income weatherization, energy assistance and crisis assistance understand the significance of restructuring and deregulation so that they can make informed responses to these changes.

10. Opportunities for the Future – Most of the Study Group agreed that Assurance 16 and REACH-type activities and heating equipment repairs and replacements could be budgeted within the 25% that HHS allows (with a waiver) for weatherization and related activities. DHCD noted that from a budget standpoint, if new and expanded

services are provided through the weatherization network and included as a part of a waiver request to HSS for 25% of the block grant, the number of assisted households should not decrease. In other words, this could be a shift of funds for Weatherization, Crisis and HERR to Weatherization (only), with the addition of activities such as energy education and case management.

11. Impact Evaluations and the Cost Effectiveness of LIHEAP Funded Services –

The Study Group discussed a desire to identify resources needed to complete an impact evaluation of all services funded with LIHEAP funds. An evaluation of services conducted on any of the LIHEAP components (Fuel Assistance, Weatherization, and Crisis) could be expensive. DHCD supports the Study Group's desire to conduct an evaluation of all LIHEAP components. DSS and/or DHCD would have to identify, and budget, resources to complete the evaluation(s). DHCD is working with DOE on a possible evaluation protocol or model that could be used for weatherization work completed with DOE funds. This, and previously completed evaluation work on weatherization in Virginia, may help to reduce costs to evaluate LIHEAP weatherization work in Virginia.

The recommendations in this report illustrate opportunities for LIHEAP to contribute to the objective of improved low-income energy conservation. It is important to recognize the innovative management patterns that have helped create the kinds of innovative programs, which have surfaced in other states over the years. Those states that have established strong program leadership, incorporated positive change and self-evaluation into their programs, and empowered their local agencies with appropriate decision-making authority have been the leaders in the LIHEAP field. Virginia has an opportunity to be in the forefront of states administering LIHEAP funds by focusing on long-term conservation measures combined with an appropriate level of direct assistance to meet short-term, emergency heating needs. This opportunity would require adjustments by many of the organizations participating in the study as well as an increase in the level of coordination among them

INTRODUCTION

The federal government established the Low-Income Home Energy Assistance Program (LIHEAP) Block Grants in 1981 as one response to the energy crisis of the late 1970s and early 1980s. It is one of seven block grant programs originally authorized by the Low Income Home Energy Assistance Act of 1981 (Title XXVI of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended). Federal implementing regulations for LIHEAP may be found at the federal Department of Health and Human Services (HHS) Block Grant Regulations at 45 C.F.R. Part 96. LIHEAP currently assists nearly 5 million households annually with annual appropriations in the range of \$1.1 billion - \$1.2 billion.

The program was designed to minimize government bureaucracy and maximize involvement by civic institutions. Local and state LIHEAP providers, encouraged by Congress and the federal government, have become increasingly innovative in the areas of policy and program design, development, and implementation. However, there are differences of opinion at the national, state and local levels concerning the current best use of LIHEAP funds. The following questions summarize the primary differences among the major concerned parties:

- (a) Should LIHEAP address short term versus long-term needs?
- (b) Should an administratively simple and inexpensive program design but one that lacks on-site assessments of household circumstances be pursued instead of one that employs on-site visits with an assessment of needs as they relate to the goals of LIHEAP?
- (c) Should LIHEAP, and if so to what extent, address energy self-sufficiency through program going beyond direct vendor or client payments?

The Virginia Department of Social Services (DSS) currently administers LIHEAP funds. As authorized by the federal statute, LIHEAP funds may be used by grantees such as states for the following types of assistance:

- Home heating and cooling assistance:
- Energy crisis interventions (with a reasonable amount reserved, based on prior year's data, until March 15 of each program year):
- Low cost weatherization or other energy-related home repair (not to exceed 15% of the funds allotted to or available to a grantee except that a grantee may request a waiver that increases the amount of LIHEAP funds a grantee may use for weatherization from 15% up to 25%).

A second federal program also addresses home weatherization. The Low Income Weatherization Assistance Program (WAP) is the nation's oldest and largest low-income residential energy conservation program. It was created by the Energy Conservation and Production Act of 1976 (PL 94-385). The WAP assists approximately 63,000 households annually with an appropriation of approximately \$120 million. The U.S. Department of Energy's (DOE) implementing regulations may be found at 10 C.F.R. Part 440. In Virginia, DHCD has administered the Weatherization Assistance Program since 1991.

As noted above, the states have been granted the discretion to spend a portion of LIHEAP funds on weatherization activities. A total of forty-four (44) states allocated approximately \$134 million in LIHEAP funding for weatherization assistance during FY 1997. In general, and to the extent that the DOE Weatherization rules do not conflict with LIHEAP requirements, these funds may be spent in accordance with the same rules and requirements as the DOE Weatherization Program. By passing HB 1103, the 1998 General Assembly transferred administrative responsibility for a minimum of fifteen percent of the LIHEAP Block Grant from DSS to DHCD in order to provide weatherization services within the Commonwealth.

Weatherization assistance, whether funded by WAP, LIHEAP, or other sources, can range from low- or no-cost interventions to more comprehensive approaches that treat the structure and its heating and cooling components as a system. Virginia's Weatherization Assistance Program follows the latter course; it includes testing related to health, safety, and efficiency both before and after work is completed. The approach produces a number of important benefits by:

- Reducing reliance on inefficient combustion equipment
- Reducing the high energy-related costs burdens of low-income clients
- Improving overall housing conditions
- Reducing the need for other tax-supported programs (fuel assistance, other housing)
- Providing jobs in the housing and energy efficiency sectors.

Although federal appropriations for both the WAP (47%) and LIHEAP (31%) have been reduced in recent years, the 1998 program reauthorization extended the LIHEAP program through FY 2004 at approximately the 1998 funding level.

The homes of approximately 2,100 low-income families were weatherized with DOE WAP and HHS LIHEAP funds in Virginia in FY 1997. An additional 700 homes may be weatherized with the recent increase in the allocation of LIHEAP weatherization assistance funds from 7.5% to 15%. Nearly 375,000 households, not in public housing, are eligible for weatherization assistance in Virginia.

Approximately 89,000 Virginia households have received assistance since the inauguration of the WAP. Currently, more than 5,000 eligible households statewide are on active waiting lists for weatherization assistance.

Federally Mandated Coordination

Federal program rules attempt to enforce cooperation and coordination among the entire gamut of energy-related programs. A state must agree to sixteen (16) assurances as part of its application to HHS. Assurance #4 requires the state to “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 IV (relating to community services block grant program (Community Action Programs)) 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 program under title IV of the Energy Conservation and Production Act, or under any other provision of law which carries out programs which are administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act.”

Patterns of Innovation

Because LIHEAP grantees have considerable discretion in interpreting the various required assurances, there are opportunities to explore options that reduce households’ needs for energy in the future. Several states have recently taken advantage of this flexibility to test alternatives that could increase program effectiveness and energy efficiency.

The 1993 Oak Ridge National Laboratory (ORNL) report, “A Weatherization Manual for LIHEAP Policy Makers and Program Administrators”, showcases examples of how other states have used LIHEAP funds in creative and productive ways, combining the DOE Weatherization Assistance Program funding, and a variety of other federal, state, and utility company resources. The innovative programs the report describes demonstrate how LIHEAP funds can be used for such things as client education, targeting households using excessive amounts of energy, staff training, assessment, and audits for weatherization services.

The report notes that several common features characterize innovative state and local programs and their managers. These features address how state managers conduct their business as well as how they relate to the subgrantees responsible for local program implementation:

- Openness to change: Organizations that are now on the cutting edge of energy conservation technologies are those routinely reexamining the way they do

business. Continual and aggressive action is taken to “do better” (e.g. systematic evaluation of existing procedures and periodic evaluation of program performance).

- Directors who not only manage, but also lead: These Directors are not satisfied with the status quo. They are oriented to the goal of improved client service in an environment where resources are scarce but opportunities to develop new resources can be identified and exploited. They seek funds from multiple funding sources and develop coordinated approaches to solve their unique client needs. They initiate pilot projects, and then—based upon the results of the projects—expand effective programs throughout the state.
- States that are willing to empower local program implementers and administrators with the discretion and authority to make critical decisions: These states have recognized that the local level is the critical decision-making level for client assistance. The flexibility provided by LIHEAP funding and rules plays a key role in enabling effective local decision-making.

It is important to view the objectives of providing low-income energy assistance, energy conservation, and housing rehabilitation as part of a related package of client services. Properly coordinated, the individual parts can yield a much greater and more beneficial whole to the client and the program(s). For example, using LIHEAP fuel assistance lists as a referral source for weatherization providers helps them expedite eligibility requirements and give a higher priority to households receiving fuel assistance, particularly those containing elderly, disabled and young children. High-consumption households also may receive a higher priority, depending on the accuracy and basis for the energy usage. The required site-specific WAP estimation can confirm the make-up of the household and identify the particular energy, health and safety-related energy improvements with the highest potential benefit for the household.

Federally Allowed Services that Encourage and Enable Households to Reduce Their Need for Energy Assistance

In 1994, Congress added a new provision “Assurance 16” to Public Law 103-252, the Low Income Home Energy Assistance (LIHEAP) Block Grant statute. It provides that LIHEAP grantees have the option of spending no more than five percent (5%) of their LIHEAP funds on “services that encourage and enable households to reduce their home energy needs and thereby reduce the need for energy assistance, including needs assessment counseling, and assistance with energy vendors”. Nineteen states allocated anywhere from .02% to the 5% maximum of their LIHEAP grant for Assurance 16 type activities in FY 1997.

In 1996, the U. S. Department of Health and Human Services (HHS) contracted with the Economic Opportunity Research Institute (EORI) to prepare a report on the experiences of grantees and subgrantees implementing programs authorized by Assurance 16 and that used outcome measures. These programs and services addressed the three national goals and sub-goals of energy affordability, reduction in the use of crisis services, and increased participant self-reliance. The EORI report, "Assurance 16 Services in FY 1995 & FY 1996: Opportunities for Measuring the Results of LIHEAP Services", describes the following four approaches used to implement Assurance 16:

Payment self-reliance support includes advocacy or mediation with vendors and clients needed to establish and follow-up the implementation of a schedule and level of continuing client payments. The goal is for the client to assume responsibility for all energy bills.

Energy education attempts to reduce energy waste.

Leveraging seeks additional resources for clients.

Case management or "family development management" incorporates extended interventions to reduce and, if possible, eliminate future dependence on energy assistance.

Texas Comprehensive Energy Assistance Program as a Model

Over the past six years, Texas has used LIHEAP funds to carry out the activities of the Comprehensive Energy Assistance Program (CEAP). The stated CEAP rationale is to encourage energy self-sufficiency by addressing the underlying contributing causes of energy induced hardships. The Texas Department of Housing and Community Development uses 5% of the LIHEAP budget, as authorized by the U.S. Department of Health and Human Services under Assurance 16. In formulating its primary CEAP goal the Texas agency adopted the following four components:

- a) Assist households in developing goals for energy self-sufficiency through case-management and a utility co-payment plan (the Co-Payment Component);
- b) Provide relief to low-income elderly and disabled households that are the most vulnerable to the high cost of energy for home heating and cooling (the Elderly and Disabled Assistance Component);
- c) Provide one time assistance in an energy related crisis (the Energy Crisis Component); and

- d) Address inefficient home heating and cooling appliances through a retrofit, repair and replacement program (the Replacement, Repair and Retrofit of Heating/Cooling Component).

STUDY GROUP ISSUES AND DHCD RESPONSES / RECOMMENDATIONS

In addressing the requirements of the study, the LIHEAP Study Group participants identified the issues discussed in the following summaries as being critical components of an effective LIHEAP services delivery system. Following the identification of these issues, DHCD has provided a number of recommendations or responses that represent the agency's identification of the most effective method for addressing each issue.

1. The Availability of Other (additional) Funding Sources – The Study Group discussed options for local educational opportunities that might result in additional resources to provide needed services, the need to look at non-traditional ways to match/expand resources, the need to look at leveraging non-monetary and monetary resources, the need to improve coordination at the local level, and the possible need for a resource directory/information clearinghouse addressing program availability, eligibility, provider contact, etc.

Local service providers do a commendable job of pooling resources to meet the needs of the individuals in their communities, whether energy-related or other basic needs. State staff should be sensitive to the interaction among policies, rules, and regulations (e.g. inconsistencies in eligibility requirements for complementary programs) that, potentially, could unnecessarily complicate or impede local efforts to coordinate and maximize the effective use of limited resources.

Although, in their respective roles in the administration of LIHEAP program activities, state employees cannot serve as advocates for new or additional resources, a state level perspective and information can give local service providers better insights into the “big picture”. Local providers can be kept better informed of the availability of other resources that would be compatible with the LIHEAP services and potentially increase their effectiveness.

DHCD Response/Recommendation: DHCD and DSS should work to provide whatever information is available and necessary to assist local service providers in understanding and keeping current with services available through, and related to, the LIHEAP block grant. For example, a “resource directory” providing information, sorted by locality, of available energy and housing assistance and an overview of the policies, eligibility and

contact information, etc. for LIHEAP and related programs could be coordinated through DSS or DHCD.

It became apparent, during the discussions among the members of the three networks represented in the LIHEAP Study Group, that the various organizations had had limited contact with each other prior to the legislative action establishing the Study Group. Each network has regularly scheduled meetings to discuss issues related to the programs for which it has responsibility. Each network should make a point of attending the meetings of the other networks, and each network should include a representative (or representatives) from the other network(s) to share concerns, problems, issues, and recommended solutions to common areas of interest.

2. Using the Same Provider of Heating Equipment Repairs/Replacement and Weatherization – The Study Group discussed the need to maintain a system that *allows* the local weatherization office to provide LIHEAP funded heating equipment repairs and replacements.

Prior to the involvement of the weatherization network in providing LIHEAP funded heating equipment repairs and replacements, there was *no* quality control at the field level for the assessment of services requested, the appropriateness of equipment provided, or the appropriateness and completion of actual work charged to the program. Nor was there any level of quality control for the health and safety concerns (e.g. carbon monoxide emissions, proper draft of flue gases, proximity to combustibles, fuel leaks, etc.) related to heating equipment repairs and replacements.

The weatherization network, as the common provider of heating equipment repairs/replacements and weatherization, provides a level of quality control that would not otherwise exist. Local DSS programs cannot reasonably be expected to have the technical staff or expertise to monitor these types of LIHEAP funded activities.

The weatherization network is, at the same time, able to pool other resources needed to do a “complete” and more permanent job. For example, in FY 1997-1998, ten percent of the households that received weatherization assistance also received assistance, through the efforts of the local weatherization administrator, with other basic housing needs like indoor plumbing, handicapped accessibility, roof repairs/replacements, electrical repairs, and other structural needs.

The network of local weatherization providers managed a successful LIHEAP heating equipment repair and replacement program in 1994-95 and 1995-96. Two changes in state DSS program policies related to heating equipment repairs and replacements ended the weatherization network’s ability to continue this

successful arrangement. The first reduced individual benefit levels to make the necessary repair/replacement safe and appropriate. The second policy change involved a state interpretation, accepted by the HHS, that all “crisis” heating equipment repairs and replacements must be completed within 48 hours after the referral is made. It was generally not possible to complete the more comprehensive activities associated with the weatherization program within this limited period. The fact that more than 75% of the LIHEAP funds budgeted in 1997-1998 for the Crisis Component and the Heating Equipment Repair and Replacement (HERR) subcomponent went unspent might suggest that these two changes effectively rendered a number of applicants “ineligible” for LIHEAP Crisis and HERR assistance.

DHCD Response/Recommendation: DHCD will continue to allow local Weatherization administrators flexibility to procure equipment and services for their clients from private vendors, as allowed by state and federal procurement while maintaining a high level of quality control.

Two options that DSS could consider include:

- (a) Offering local DSS offices the flexibility to procure local weatherization providers as HERR vendors or as monitors of HERR services for quality control (based on the standards for heating equipment diagnostics, repairs and replacement contained in the Virginia Weatherization Assistance Program Installation Standards). HERR vendors would not be paid until the local DSS has received a signed inspection that the HERR work has been completed to the Installation Standards, or
- (b) Allowing DHCD to administer funding for heating equipment repairs and replacements to be administered through its weatherization network. This could relieve local DSS of administrative burdens related to the Crisis Component. It is unreasonable and unrealistic to expect a local DSS or weatherization administrator to receive a referral for a heating equipment problem and expect the on-site assessment to occur and the proper repair or replacement to be completed, all within 24-48 hours after the request for assistance is received. DHCD would seek a legal opinion that supports a more reasonable time frame to respond or would permit these services to be provided on a “non-emergency” basis, not subject to a 24-48 hour period complete turnaround.

3. Increased Self-Sufficiency and Case Management – The Study Group discussed the need to look at using LIHEAP funds for case management (to include client education and counseling) and the types of assistance that would encourage and improve *energy self-sufficiency* (to include increased recipient responsibility for benefits received)

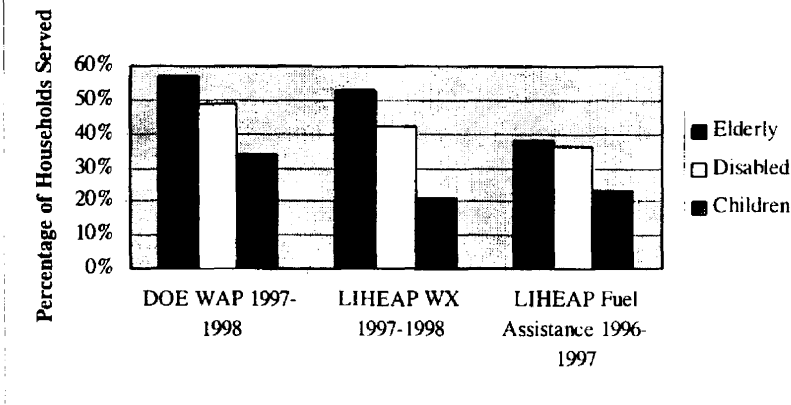
As previously described, the Texas Comprehensive Energy Assistance Program (CEAP) provides one innovative model of how a state can attempt to encourage increased energy self-sufficiency by addressing the underlying contributing causes of energy induced hardships. Client goals are developed. Vulnerable populations are given extra attention. One-time crises are addressed. The program design also addresses inefficient home heating and cooling appliances.

DHCD Response/Recommendation: Use LIHEAP funds to develop and implement an Assurance 16-type pilot program. The pilot program could be operated by a local weatherization administrator, a local CAP or a local DSS, funded within 5% of the total block grant funds received from HHS and currently under contract with DSS or DHCD. *[Note that this item appears to be repeated under issue number 6. DHCD was unable to make any distinctions between these issues as described in number 3 and also described in number 6. Therefore, the responses for both issues are similar. Note also that the response/recommendation for item number 10 includes the option to increase funding for the LIHEAP Weatherization Component to as much as 25% and that Assurance 16 type activities (e.g. a pilot) could be carried out within the Weatherization Component.]*

4. Continuation of Services for those with the Lowest Incomes in Meeting Basic Needs – The Study group discussed whether the clientele differed between the DOE Weatherization Assistance Program, LIHEAP Weatherization Component and other LIHEAP Components. The Group also discussed concerns that basic housing and energy-related needs not be overlooked.

As reflected in the chart and table on the following page, it appears that the “vulnerability” of a household is similar in all DOE Weatherization Assistance Program and LIHEAP assistance cases. This is true regardless of whether the energy-related needs of a household involve the direct payment of an energy bill; the repair or replacement of an inefficient, unsafe (oftentimes life-threatening) or inoperable source of heat; or the completion of energy conservation improvements to a cold, drafty, and unhealthy dwelling. Clearly, the majority of households receiving assistance under LIHEAP are at very low-income levels. When coordinated with other housing assistance programs and other programs available through local weatherization, Community Action Programs and local DSSs, basic needs beyond a source of affordable heat (safe heat, indoor plumbing, handicap accessibility, etc.) are also met.

LIHEAP and DOE WAP Demographic Comparisons



NOTES:

- LIHEAP components track children under the age of 6, while the DOE WAP program tracks children under the age of 18.
- For DOE WAP, all households served were at or below 130 percent of the poverty level (68 percent of all households had an annual income under \$10,000).
- For LIHEAP Weatherization (WX), all households served were at or below 100 percent of the poverty level.
- For LIHEAP Fuel Assistance, all households served were at or below 110 percent of the poverty level.

1998 Poverty Income Guidelines

Household Size	100 % Poverty	110 % Poverty	130 % Poverty
1	\$8,050	\$8,855	\$10,465
2	\$10,850	\$11,935	\$14,105
3	\$13,650	\$15,015	\$17,745
4	\$16,450	\$18,095	\$21,385
5	\$19,250	\$21,175	\$25,025
6	\$22,050	\$24,255	\$28,665
7	\$24,850	\$27,335	\$32,305
8	\$27,650	\$30,415	\$35,945
Each additional member adds	\$ 2,800	\$ 3,080	\$ 3,640

DHCD Response/Recommendation: The Government Performance and Results Act (GPRA) requires that federal programs determine and describe the outcomes they expect to achieve and that they manage their programs with a goal of accomplishing these results, rather than focusing exclusively on inputs and program activities. HHS has “lightened” requirements of the non-mandated performance goal relating to assisting households containing a member of the “vulnerable” population (elderly, disabled, children). DHCD recommends that all components of LIHEAP, whether administered by DSS or DHCD, continue to target (a) households occupied by members of a vulnerable population, (b) households who appear to have the highest energy burden (based on disposable income, the number of household members, energy costs and the condition of the dwelling), and (c) households whose “crisis situation” can be assessed and confirmed by an on-site visit.

5. Coordination of Services and Referrals – Members of the Study Group expressed a need to clarify LIHEAP guidelines, simplify procedures and, in the process, minimize confusion for the applicant and local provider.

DHCD can respond only to the coordination of services and referrals as they relate to local nonprofits under contract with DHCD to provide weatherization assistance, housing assistance and with local community action agencies.

DHCD Response/Recommendation: With the change in state level responsibilities for LIHEAP Weatherization from the Department of Social Services to the Department of Housing and Community Development, it is anticipated that problems with the coordination of services and referrals will be reduced, particularly as they relate to LIHEAP Weatherization Assistance. DHCD recommends continuing to use DSS generated lists of Fuel Assistance recipients as a source of referrals to local weatherization providers for weatherization assistance.

6. Assurance 16 and the Need for a Model – The Study Group discussed a need for flexibility to carry out activities allowed by Assurance 16 (e.g. needs assessments, counseling) and to develop a model or a pilot program.

This issue is also discussed under issue number 3. The fact that the issue was presented more than once by the members of the Study Group might suggest the importance the Group has given to this issue. DHCD’s discussion and response are the same for issue number 3.

DHCD Response/Recommendation: Use LIHEAP funds to develop and implement an Assurance 16-type pilot program. The pilot program could be operated by a local weatherization administrator, a local CAP or a local DSS, funded within 5% of the total block grant funds received from HHS and currently under contract with DSS or DHCD.

7. Local Selection of Service Vendors – The Study Group discussed a need to allow greater local flexibility in the selection of vendors for services funded with LIHEAP monies.

U.S. Department of Energy regulations for the Low-Income Weatherization Assistance Program require the grantee (state) to “...ensure that (1) Each subgrantee is a CAA or other public or nonprofit entity” and that “... in selecting a subgrantee, preference is given to any CAA or other public or nonprofit entity which has, or is currently administering, an effective program under title II of the Economic Opportunity Act of 1964, with program effectiveness evaluated by consideration of factors including ... (i) The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion; (ii) The quality of work performed by the subgrantee; (iii) the number, qualifications, and experience of the staff members of the subgrantee; and (iv) the ability of the subgrantee to secure volunteers, training participants, and public service employment workers pursuant to JTPA.” The subgrantees currently under contract with DHCD to provide weatherization assistance services (to include heating equipment diagnostics, repair and replacements) each have a minimum of ten years experience completing work to the Virginia WAP Installation Standards. Each subgrantee was evaluated as part of a formal request for proposal process and each one is informally evaluated annually to the considerations set forth by DOE.

The Department of Social Services recently decentralized the process for procuring vendors for the Crisis Component. Local DSS sites are now responsible for securing vendors. In some cases, the local DSS has requested assistance from the local weatherization office in identifying and securing a qualified vendor to perform heating equipment repairs and replacements.

DHCD Response/Recommendation: DHCD would be willing to consider additional local vendors for weatherization services, using the same considerations set forth by DOE as reported above. A new vendor would be subject to the same payment criteria as an existing vendor (subgrantee)--no payment will be made for work that is incomplete and has not been inspected to assure compliance with the requirements of the Virginia WAP Installation Standards.

8. Streamlining Administrative Services – Study Group members (local DSS Directors in particular) would like to see overall LIHEAP administrative costs reduced. Suggestions included the sharing of “best practices” and reducing duplication, particularly in completing and processing applications.

This issue appears to be more directly related to the administration of non-weatherization types of assistance by DSS and local Departments of Social Services.

DHCD Response/Recommendation: DHCD is unable to offer a complete response to this issue, but, in general, encourages opportunities for “one-stop shopping” for customers. DHCD would consider incorporating any streamlining initiatives within the context of its weatherization activities.

9. Electric Utility Restructuring and Deregulation – The Study Group noted the potential impact of utility restructuring and deregulation on low-income residential customers. They suggested encouraging or advocating low-income residential consumer protections, benefits and education in connection with deregulation. However, no financial resources were identified that would support carrying these activities.

Under the current regulatory system, most utilities operate as regulated private businesses, providing a vital societal function. In many states, the public regulatory commissions have required utilities to provide discounted rate service to low-income households and imposed a moratorium on heating season shut-offs, regardless of their ability to pay. Losses associated with the moratorium have been shifted to the general rate base, causing all customers to share this cost, thereby insuring that no single ratepayer is unduly burdened.

In the past few years, several states have passed laws or begun pilot programs to create residential retail energy markets with deregulated prices and varying levels of consumer protection. With such deregulation, future retail price trends for residential customers are uncertain. In an uncertain marketplace, LIHEAP may be increasingly important as a source of heating and cooling support for low-income households.

Issues may arise between the development of a wholly competitive energy marketplace and the social desire to assure that lower-income households can continue to afford electricity. This dilemma may increase the importance, and potentially the scope, of LIHEAP in the years ahead. As individual states adopt deregulation regimens, it is unclear what will substitute for the “obligation-to-serve” regulations that most of the nation’s utilities must now meet.

The 1997 Oak Ridge National Laboratory study, “Low-Income Energy Policy in a Restructuring Electric Industry”, observed that under restructuring, a greater portion of costs may be allocated to fixed charges, accompanied by a declining per unit rate of gas or electricity. However, most discount programs

focus on volume of usage and not fixed charges. The fixed costs of serving low-volume customers, such as low-income residential customers, are proportionately greater than for high-volume customers. As low-volume users, low-income customers may confront cost increases from restructuring.

DHCD Response/Recommendation: Given the uncertainties of the future energy marketplace, the need for the types of assistance funded by LIHEAP may increase. DHCD and DSS should provide whatever information state legislators require to help them understand the potential impact of restructuring and deregulation on the low-income electric customer currently receiving LIHEAP or WAP assistance. This would help assure that consumer protection issues are considered during the transition to a competitive environment and that low-income consumers are not harmed by this transition. DHCD and DSS should also help providers of low-income weatherization, energy assistance and crisis assistance and the recipients of their services to understand the significance of restructuring and deregulation so that these recipients can make educated decisions in response to these changes. These education and low-income consumer protection issues may require financing, which could result in proposals to fund these activities as a part of the restructuring and deregulation “package”.

10. Opportunities for the Future – Most of the Study Group agreed that Assurance 16 and REACH-type activities (needs assessment, counseling, energy efficiency education etc.) and heating equipment repairs and replacements could be budgeted within a total 25% that HHS allows (with a waiver) for weatherization and related activities. However, DSS would need to seek a waiver from HHS for up to 25% of the LIHEAP to be used for weatherization, to include energy conservation education, case management, heating equipment inspections, repairs and replacements, etc.

DHCD Response/Recommendation: Increased funding for local weatherization administrators, local CAPs or local DSSs to provide assistance such as energy education, case management, and HERR types of assistance has been discussed above. States are required to operate the program through community-based nonprofit entities, including a statutory preference for community action agencies, among others. Local DSSs and local weatherization-only administrators may, or may not, want, or be able to, develop such activities.

From a budget standpoint, if these new and expanded services are provided through the weatherization network, and included as a part of a waiver request to HSS for 25% of the block grant, the number of households assisted, by comparison, to previous years, should not decrease. In other words, this could be a budget shift of funds for Weatherization, Crisis and HERR to Weatherization (only), with the addition of activities such as energy education and case management.

11. Impact Evaluations and Determining the Cost Effectiveness of Services Provided with LIHEAP Funding – The Study Group discussed a desire to identify resources needed to complete an impact evaluation of all services funded with LIHEAP funds.

In 1989-90, the Virginia Center for Coal and Energy Research (VCCER) conducted an evaluation of Virginia's DOE Low-Income Weatherization Assistance Program. The main objective of the evaluation was to improve the energy savings and cost-effectiveness of the program by developing a new protocol of energy conservation measures and by recommending improvements in administrative procedures. DHCD implemented the new protocol and improved administrative procedures in 1991. The cost to complete the evaluation was \$150,000.

In 1992, Appalachian Power Company [now American Electric Power (AEP)] initiated a two-phase, demand-side management weatherization program for low-income customers in its Roanoke, Virginia Division. APCO contracted with DHCD to administer the program. DHCD used the existing network of local weatherization administrators to perform the work and its Weatherization Assistance Program to guide and monitor the work completed. AEP later contracted with the Corporation for Ohio Appalachian Development (COAD) to perform process and impact evaluations of the program. COAD reported a savings-to-investment-ratio (SIR) of 3.53 for the program, based on AEP's marginal production cost of electricity (the SIR is greater if you use the customer's cost to purchase the electricity). COAD reported a simple payback of 4.59 years for the program.

In 1990, DOE sponsored a comprehensive national evaluation and assessment of the Weatherization Assistance Program under the supervision of the Oak Ridge National Laboratory (ORNL). In 1996, ORNL conducted a Metaevaluation of 17 state-level evaluations, which suggested that improved practices had produced higher average energy savings than reported in the 1990 evaluation. The energy conservation work evaluated in 1996 is the same type of site-specific, highly technical work implemented by DHCD in response to the 1990 VCCER evaluation (blower door directed air-sealing, air leakage control measures for distribution systems, dense-pack sidewall insulation, etc.).

DHCD has implemented the use of DOE's computerized National Energy Audit (NEAT), a site-specific audit that produces a prioritized list of cost-effective, energy efficiency measures customized for each home and provides an estimated dollar value for the projected energy savings and savings-to-investment ratios. NEAT has confirmed the guidelines set forth in the Virginia

WAP Installation Standards; however, DHCD allows local weatherization administrators to deviate or expand on the work called for in the Installation Standards as long as the measure(s) is supported by a site-specific NEAT audit.

DHCD Response/Recommendation: An evaluation of services conducted on any of the LIHEAP components (Fuel Assistance, Weatherization, and Crisis) can be expensive. DHCD supports the Study Group's desire to conduct an evaluation of all LIHEAP components. DSS and/or DHCD would have to identify, and budget, resources to complete the evaluation(s). DHCD is working with DOE on a possible evaluation protocol or model that could be used for weatherization work completed with DOE funds. This, and previously completed evaluations on weatherization activities in Virginia, could help reduce costs for evaluating LIHEAP weatherization work in Virginia. This may or may not be the case for the non-weatherization LIHEAP components.

APPENDIX A: HB 1103

CHAPTER 693

An Act to amend and reenact § 36-139 of the Code of Virginia and § 1 of Chapter 495 of the 1996 Acts of Assembly, relating to the Low Income Home Energy Assistance Program; administration; study.

[H 1103]

Approved April 16, 1998

Be it enacted by the General Assembly of Virginia:

1. That § 36-139 of the Code of Virginia is amended and reenacted as follows:

§ 36-139. Powers and duties of Director.

The Director of the Department of Housing and Community Development shall have the following responsibilities:

1. Collecting from the governmental subdivisions of the Commonwealth information relevant to their planning and development activities, boundary changes, changes of forms and status of government, intergovernmental agreements and arrangements, and such other information as he may deem necessary.

2. Making information available to communities, planning district commissions, service districts and governmental subdivisions of the Commonwealth.

3. Providing professional and technical assistance to, and cooperating with, any planning agency, planning district commission, service district, and governmental subdivision engaged in the preparation of development plans and programs, service district plans, or consolidation agreements.

4. Assisting the Governor in the providing of such state financial aid as may be appropriated by the General Assembly in accordance with ~~§15.1-1412-15.2-4216~~.

5. Administering federal grant assistance programs, including funds from the Appalachian Regional Commission, the Economic Development Administration and other such federal agencies, directed at promoting the development of the Commonwealth's communities and regions.

6. Developing state community development policies, goals, plans and programs for the consideration and adoption of the Board with the ultimate authority for adoption to rest with the Governor and the General Assembly.

7. Developing a Comprehensive Housing Affordability Strategy to guide the development and implementation of housing programs in the Commonwealth for the purpose of meeting the housing needs of the Commonwealth and, in particular, those of low-income and moderate-income persons and families.

8. Determining present and future housing requirements of the Commonwealth on an annual basis and revising the Comprehensive Housing Affordability Strategy, as necessary to coordinate the elements of housing production to ensure the availability of housing where and when needed.

9. Assuming administrative coordination of the various state housing programs and cooperating with the various state agencies in their programs as they relate to housing.

10. Establishing public information and educational programs relating to housing; devising and administering programs to inform all citizens about housing and housing-related programs that are available on all levels of government; designing and administering educational programs to prepare families for home ownership and counseling them during their first years as homeowners; and promoting educational programs to assist sponsors in the development of low and moderate income housing as well as programs to lessen the problems of rental housing management.

11. Administering the provisions of the Industrialized Building Safety Law (§36-70 et seq.).

12. Administering the provisions of the Uniform Statewide Building Code (§36-97 et seq.).

13. Administering the provisions of the Statewide Fire Prevention Code (§27-94 et seq.).

14. Establishing and operating a Building Code Academy for the training of personnel in building regulations promulgated by the Board of Housing and Community Development.

15. Administering, in conjunction with the federal government, and promulgating any necessary regulations regarding energy standards for existing buildings as may be required pursuant to federal law.

16. Identifying and disseminating information to local governments about the availability and utilization of federal and state resources.

17. Administering, with the cooperation of the Department of Health, state assistance programs for public water supply systems.

18. Advising the Board on matters relating to policies and programs of the Virginia Housing Partnership Revolving Fund.

19. Designing and establishing program guidelines to meet the purposes of the Virginia Housing Partnership Revolving Fund and to carry out the policies and procedures established by the Board.

20. Preparing agreements and documents for loans and grants to be made from the Virginia Housing Partnership Revolving Fund; soliciting, receiving, reviewing and selecting the applications for which loans and grants are to be made from such fund; directing the Virginia Housing Development Authority as to the closing and disbursing of such loans and grants and as to the servicing and collection of such loans; directing the Virginia Housing Development Authority as to the regulation and monitoring of the ownership, occupancy and operation of the housing developments and residential housing financed or assisted by such loans and grants; and providing direction and guidance to the Virginia Housing Development Authority as to the investment of moneys in such fund.

21. Advising the Board on matters relating to policies for the low-income housing credit and administering the approval of low-income housing credits as provided in §36-55.63.

22. Establishing and administering program guidelines for a statewide homeless intervention program.

23. *Administering fifteen percent of the Low Income Home Energy Assistance Program (LIHEAP) Block Grant and any contingency funds awarded and carry over funds, furnishing home weatherization and associated services to low-income households within the Commonwealth in accordance with applicable federal law and regulations.*

24. Carrying out such other duties as may be necessary and convenient to the exercise of powers granted to the Department.

2. That § 1 of Chapter 495 of the 1996 Acts of Assembly is amended and reenacted as

follows:

§ 1. That the Department of Social Services, or any other agency succeeding in pertinent authority, is directed to allocate at least ~~7.5~~ *fifteen* percent of all federal low-income fuel assistance program funding made available to the Commonwealth to low-income weatherization assistance programs, to the extent such allocation is permitted by federal law.

3. That the Department of Social Services shall submit the application for the Low Income Home Energy Assistance Program (LIHEAP) Block Grant and serve as the lead agency for such block grant. The Department of Social Services shall prepare its portion of the application. The Department of Housing and Community Development shall prepare its portion of the application for submission which is limited to the weatherization program and associated services. The Department of Social Services shall incorporate the Department of Housing and Community Development's portion of the application in total for the Commonwealth's application for LIHEAP Block Grant.

4. That an interagency agreement between the Departments of Social Services and Housing and Community Development be developed detailing the administrative responsibilities of each agency.

5. That the regulations promulgated by the State Board of Social Services before July 1, 1998, relating to the weatherization component of the Virginia Energy Assistance Program shall continue in effect until final regulations are adopted by the Board for Housing and Community Development, at which time the regulations of the State Board of Social Services shall be superseded. The Board of Housing and Community Development shall adopt regulations relating to the weatherization component of the Virginia Energy Assistance Program in accordance with the emergency regulation provisions of the Administrative Process Act (§9-6.14 et seq.).

6. That the Department of Housing and Community Development shall coordinate efforts with the Virginia League of Social Services Executives, Inc., the Virginia Council Against Poverty, and the Association of Energy Conservation Professionals to study the structure for the effective delivery of Low Income Home Energy Assistance Program (LIHEAP) services. This study shall include consideration of (i) the coordination between local weatherization providers, local community action agencies, and local departments of social services and (ii) possible future programs, using LIHEAP funds, which encourage self-sufficiency by addressing the underlying contributing causes of energy-induced hardships. The Department of Social Services is requested to assist with this endeavor. The Department of Housing and Community Development shall report its findings and recommendations to the Governor and the 1999 Session of the General Assembly.

APPENDIX B: LIHEAP STUDY GROUP MEMBERS

Association of Energy Conservation Professionals

Billy Weitzenfeld
John Bodtmann
Fred Gross

Virginia Council Against Poverty

Rob Goldsmith
Judy Mason
Bob Parks

Virginia Department of Housing and Community Development

Bill Beachy
Bill Ernst
Ron White

Virginia Department of Social Services

Charlene Chapman
Cathy N. Olivis

Virginia League of Social Service Executives

Sam Bush
Kimberly Irvine
Gloria Tuck

