Texas Department of Housing and Community Affairs
Frequently Asked Questions
Comprehensive Energy Assistance Program (CEAP)

For information regarding income calculations, please refer to the Department's Frequently Asked Income Questions document.

For information regarding Household Status verification, please refer to the Department guidance: US Citizenship/US National and SAVE Frequently Asked Questions document.

The Texas Department of Housing and Community Affairs (The Department) has created the following document to assist its CEAP funded Subrecipients to answer applicable program questions. In addition to this document, Subrecipients are encouraged to take the following steps to respond to their questions:

- Review your applicable CEAP Contracts
- Reference applicable TAC Rules
- Reference other applicable program rules/guidelines (OMBs, CFRs, UGMS, TAC, etc.)
- Review Department guidance on TDHCA Website

If after reading and referencing all these materials you still have questions, you may submit a program question by completing this form: https://tdhca.wufoo.com/forms/request-for-ca-program-guidance-or-training/

Click on the hyperlinks below to move to the most appropriate category that applies to your question.

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GENERAL

1. **What is the CEAP prioritization process? Should Subrecipients wait to serve non-vulnerable households until all vulnerable households have been served?**
   Your agency policy should dictate how you prioritize services to households based on their priority rating. Subrecipients can set prioritization dependent upon demand and available funds, and your process should be outlined within your annual Service Delivery Plan. TAC §6.307 requires Subrecipients establish a written procedure to serve households with a vulnerable household member, households with high energy burden, and households with high energy consumption. High energy burden shall be the highest rated item in sliding scale priority determinations. The Department recommends Subrecipients just use the primary priority factors identified above, but if additional criteria are going to be considered, those additional criteria should only be applied after making an initial determination using the primary priority factors. Please maintain a priority rating sheet and documentation of the use of the criteria.

2. **What ways can Subrecipients accept applications?**
   Subrecipients are to provide multiple means for application submissions. It is recommended to utilize online applications to increase internal efficiencies. Other acceptable means of accepting applications include via mail, fax, email, and in-person delivery. Subrecipients must also make reasonable accommodations for home-bound individuals to access applications.

3. **Can Subrecipients start accepting applications for the new program year in December?**
   Subrecipients can distribute upcoming year applications in advance. However, if Subrecipients are using the program year as their timeline, the signature date must be within the current program year (January 1 or later) and income documents will need to be for the immediate 30 days prior to the date the application was signed.

4. **Can Subrecipients provide returning clients with a shortened application?**
   Yes, Subrecipients may allow returning clients to complete a shortened application, only requiring updated income documents, newly signed/dated page stating previous household information has not changed, and citizenship and identity documents for any new household members, and/or removal of any household members who are no longer residing in the residence.

5. **Are electronic signatures on applications permitted? Can initials be used in place of signatures?**
   Electronic signatures are acceptable, but initials alone cannot be substituted for a signature.

6. **Can Subrecipients use electronic files?**
   Yes, the Department encourages Subrecipients doing so as long as all the appropriate information is gathered and retained. 2 CFR 200.334-.338 addresses record keeping requirements. Specifically, in 200.336, it outlines the option of original documents being generated electronically and there being no need to create and retain paper copies. Ensure the following are in place prior to making this transition:
   - Applicable documents created as originals and un-editable after-the-fact;
   - System must be secure to protect information and mitigate the risk of hacking;
   - There must be a good backup process in place to prevent potential for system crashing and potentially losing information (applicable record retention remains a program

requirement).

7. **Can Subrecipients assist a household with a bill that is in the name of someone not in the household?**
   Yes, you can do so as long as the bill being paid is for the service address of the eligible household. That means the address on the bill must match the address on the application and everyone residing in the home must be listed on the application. Ensure sufficient client file documentation to clarify the situation for future monitoring purposes.

8. **How should Subrecipients handle households whose composition changes during the program year after they are already receiving CEAP assistance?**
   The assistance to the initial household would remain the same for the remainder of the year. If any of the household members moved out and wish to seek CEAP assistance in their new residence, they must apply again with their new circumstances. If determined eligible, they would receive assistant just as any other new applicant.

9. **How should Subrecipients handle situations in which staff believe the applicant is providing false information?**
   It is the applicant's responsibility to ensure that all provided information is true and correct. Subrecipients are not asked to investigate whether applicants are providing true information, as the responsibility is on the client to do so. If Subrecipients want to go further, then they should have an established policy/procedure that can be followed consistently for all potential situations.

10. **How should Subrecipients handle applicants who wish to reapply after a denial?**
    Subrecipients are encouraged to develop a written policy on how often a household can apply, such as requiring denied applicants to wait 30 days prior to reapplying. Ensure all follow your established policies.

11. **How do Subrecipients determine a household is in our service area if they are on the border of counties that fall under differing Subrecipient jurisdiction?**
    The Department recommends using the USPS website to verify a household member's county as this is what our contract system pulls from and will enable you to successfully report households served. Choosing another verification system may potentially result in reporting issues; we suggest referring households that fall out of your service area to your neighboring CEAP Subrecipient. You can find a master list of contact information for all CA Subrecipients here: https://www.tdhca.texas.gov/programs/community-affairs-division

TAC §6.309 — TYPES OF ASSISTANCE AND BENEFIT LEVELS

1. **What are current maximum benefit allowances?**
   The benefit allowances are always outlined in TAC §6.309. The benefit allowances are per component (Utility Assistance and Crisis Assistance). Additionally, all households are also potentially eligible for the HVAC Service and Repair Component.

2. **What benefit level do categorically eligible households fall under?**
   Categorically eligible households should have their income calculated to determine benefit level. If their income exceeds 150% of the Federal Poverty Guidelines, then they are eligible for the lowest benefit level.

3. **If the household's percent of Federal Poverty Guidelines falls in between, such as 50.1% - 50.9%, what benefit level do we provide to the household?**
   Per TAC §6.309, if the income is more than 50%, even 50.01%, they fall in the 50-75% benefit level. If the income is 75.01%, they fall into the 75-150% benefit level. For income eligibility determination, there is no rounding of the percent of Federal Poverty Guidelines.

4. **Can Subrecipients provide households with less assistance than the maximum benefit levels?**
   Yes. The maximum benefit allowances per component are the maximums allowable. If Subrecipients choose to provide a lower limit for assistance, this should be outlined in their Service Delivery Plan and implemented consistently.

5. **How many months of assistance are households eligible for?**
   TAC §6.309 establishes the limit of up to 6 months for non-vulnerable households and up to all remaining months in the program year for vulnerable households. Subrecipients should outline in their Service Delivery Plan the number of months' assistance they'll provide vulnerable and non-vulnerable households, especially if they plan to offer something different than the TAC outlines; Subrecipients cannot exceed the limits set by the TAC.

6. **How should Subrecipients handle payment of a household's arrears?**
   Subrecipients are permitted to pay households' arrears in full and not count it towards their benefit allowance under the UA and CA components; however, they are not required to do so. Arrears can be paid even if they were accrued in the previous program year.

7. **TAC §6.309 says "*In lieu of deposit required by an energy vendor, Subrecipient may make advance payments…Advance payments may not exceed an estimated two months' billings.*" What does this mean?**
   Sometimes utility vendors will require deposits of customers they feel are risky (for example, poor credit or missed utility payments). Deposits may not be made, except as defined by TAC §6.309. The Department recommends that Subrecipients contact the vendor to see if the deposit requirement can be waived entirely or waived with an advance payment. Subrecipients may apply the advance payment to the UA Component.

TAC §6.310 — CRISIS ASSISTANCE COMPONENT (CA)

1. **What are examples of having "already lost service or in immediate danger of losing service?"**
   Examples of conditions that would be considered as "lost service" include:
   - Disconnection of electric or gas service
   - Empty propane tank, or
   - Inoperable heating/cooling system

   Examples of conditions that would be considered as "in immediate danger of losing service:"
   - A disconnect notice
   - Less than $30 remaining in a pre-paid account, or
   - Propane low reserve of fuel (under 20% remaining)

2. **Does a disconnect notice automatically count as a crisis?**
   No, a disconnect notice is not an automatic crisis. To qualify for CA, a household must have a disconnect notice or be disconnected AND meet one of the following crisis conditions, as outlined in TAC §6.310:
   - Extreme Weather Conditions
   - Disaster
   - Life-Threatening Crisis

   Please review the associated TAC for definitions and time limits associated with this form of assistance.

3. **If crisis criteria are met, is it allowable to use CA funds to pay arrears and regular UA to pay current charges for a household?**
   It is allowable to use both components for payment of a first bill, assuming you can document that the household is in immediate danger of losing service or has lost service and that they have met crisis conditions.

4. **How many CA payments could a household potentially receive for the year?**
   Households may receive as many crisis payments, when properly triggered by CA criteria as outlined in TAC §6.310, up to their approved maximum benefit allowance.

5. **Can Subrecipients purchase portable heating/cooling units for someone that has no heating/cooling? Can CEAP funds pay for the installation of the portable units?**
   Yes, CEAP funds can be used to purchase and install portable heating/cooling units when the situation meets the proper crisis conditions as outlined in TAC §6.310. For non-vulnerable households, this is permitted under CA, if they meet crisis criteria, per TAC §6.310. For vulnerable households, if a heating or cooling system is nonexistent, purchase of heating or cooling units is allowed under UA, per TAC §6.311.

6. **Under Crisis Assistance, if it is determined that a repair of existing heating/cooling equipment is necessary to resolve the crisis, how long do Subrecipients have to repair component(s)?**
   TAC §6.310 outlines the time frames associated with Crisis Assistance. The Subrecipient must, at minimum, have a documented work order of the service/repair within the allotted time frame.

7. **How are disasters and purchases associated with disasters handled under CEAP?**
   A disaster is an event declared by the President of the United States or the Governor of the State of Texas and results in energy supply shortages or other energy-related emergencies in your service area. Ensure the situation meets the crisis conditions outlined in TAC §6.301 and TAC §6.310. Second, documented proper procurement of items such as blankets must be conducted. Be cautious to not procure more than is necessary for the crisis event. Review Small Purchase or Non-Competitive procurement methods on the Department Procurement webpage.

8. **Can Subrecipients assist households with the purchase of propane using CA?**
   The purchase of propane is allowable under CA provided the crisis conditions are met, as outlined in TAC §6.310. Normal deliveries of propane should be handled under the UA component.

9. **Are extreme weather conditions only crisis criteria during certain months?**
   Yes, extreme weather conditions only apply during the winter months of November, December, January and February, and the summer months of June, July, August, and September, as identified in TAC §6.301. Review your agency's specific temperature triggers as outlined in your Service Delivery Plan.

10. **How do we determine if a household meets the condition of Life-Threatening Crisis if they do not verbally disclose that information? Can we utilize a self-certification form, or will a verbal certification suffice?**
    Per TAC §6.301, a client statement is sufficient to document this condition and medical information is not to be requested. This information can be provided verbally and must be reflected in case notes to document that crisis conditions were met. The Subrecipient should have a procedure in place to assess if households are experiencing a life-threatening crisis.

TAC §6.311 — UTILITY ASSISTANCE (UA)

1. **If the household does not have a complete 12-month billing history, what options do Subrecipients have for making UA pledges?**
   Two options: (1) a current bill along with the most recent Department-approved Alternative Billing Method is to be used to pledge households that do not have a complete 12-month billing history, per TAC §6.309; or (2) pay based on their monthly bill(s).

2. **Under the UA component, does the Subrecipient commit pledged funds monthly or all at once?**
   Whether the pledge is made in one lump sum or monthly is up to the Subrecipient. Making the lump sum pledge payment when the client qualifies is the most efficient option.

3. **If an electric vendor tells the Subrecipient they cannot differentiate between an agency payment and a customer payment, are we able to make the future assistance pledge?**
   If the vendor cannot differentiate between customer and Subrecipient payments, then the vendor would not be able to provide a refund back to the Subrecipient if the client were to switch vendors prior to using the entire pledge amount. If the vendor cannot do that, which is a requirement in the vendor agreement, then utilizing the future pledge is not an option with that specific vendor. Paying monthly is the only option to ensure the income-qualified client receives the maximum benefit possible.

4. **If an electric vendor has a bundled bill that includes more than electricity, like trash, recycling, compost, etc., are we able to make the future assistance pledge?**
   This is dependent on the vendor's ability to apply the pledge amount. If the vendor will accept a lump sum payment and NOT apply it only to "home energy" costs, then lump sum payments are NOT an option for this vendor. Subrecipients can continue to make monthly payments, per usual UA processes, in compliance with the TAC.
   If the vendor will accept a lump sum payment and ensure they will apply it only to "home energy" costs, then the lump sum payment is an option for this vendor.

5. **Can we pay two fuel sources for clients? For a single month of assistance, does that count as one payment or two payments?**
   You may pay two fuel sources for each month of assistance that a household is deemed eligible for, per TAC §6.309. Count this as one month's payment. The Department recommends prioritizing the fuel source that has the highest bills to maximize client assistance before paying on the secondary fuel source.

6. **If a household applies and they have a credit or zero balance at the time of application, how do Subrecipients determine benefits for their first month of assistance?**
   CEAP can only pay charges that are outstanding in order to prioritize households with an "immediate need," per TAC §6.302. If nothing is currently owed, or they have an existing credit, there is no immediate need, and they should re-apply when they have a balance owed. Subrecipients should establish a policy/process to define what is considered "immediate need" for clients in this situation. A common strategy amongst the network is that "immediate need" is defined as having a credit that is expected to cover less than the current month's utility usage.

7. **If a household applying for current program year benefits was assisted in the prior program year and did not receive maximum assistance in the prior year, can the unused benefit amount from the prior year be paid in the current year?**
   No. Benefit allowances start over January 1 of every program year regardless of what the household received in the previous program year.

8. **How do we deal with clients who are currently enrolled in different payment plans (deferred payment, average/level billing, pre-paid, etc.) with their utility vendor? How do we determine payment amounts on their behalf?**
   This is a potentially complicated answer based on the specific situation for the client and the vendor. Regardless of the payment situation, if/when a client is going to get a payment from CEAP, the following must be met:
   - The UA payment amount must be determined using either:
     (a) billing history,
     (b) Department approved ABM, or
     (c) monthly bill.
   - Addressing arrears or current outstanding balances, if applicable, should be done as outlined within the TAC and your approved Service Delivery Plan, and implemented consistently across all applicable households.
   - The stipulations of the vendor agreement must be met, and the vendor must be capable

of applying the CEAP payment appropriately to the client's bill, as applicable. See guidance on bundle billing, if applicable.

If the vendor, or the situation with the client, cannot meet those stipulations then the Subrecipient and/or customer will need to figure out what changes might need to happen (monthly payments instead of lump sum, unenroll from program, update/enforce vendor agreement) in order to meet those requirements. All of this comes with the caveat that Subrecipients must have adequate documentation to support why/how decisions were made, payment amounts were determined, payments were made and applied, etc., to ensure the funds are being used according to their intended purpose.

9. **Are late fees to vendors an allowable program expense?**
   No. Late fees are considered penalties or fines as identified in 10 TAC §6.309 and are not allowable.

10. **What is the process for developing a "Department-approved Alternative Billing Method?"**
    Instructions for developing an Alternative Billing Method are located in the annual Service Delivery Plan guidance.

11. **If an eligible household presents a bill with their application that is for an amount that exceeds the maximum assistance available to them through either UA, or CA, or UA and CA combined, can they be assisted?**
    Potentially yes. If the client's service is not at risk of disconnection and they do not meet crisis criteria, you may only assist with UA funds, within the allowable benefit levels.
    If they are at risk of disconnection and meet one of the crisis criteria, they may be eligible for CA. However, if the assistance provided cannot resolve a disconnection, you may not assist with Crisis funds. Assisting in these types of situations may require a combination of efforts to resolve, including the following: contacting the utility vendor to negotiate the waiving of fees, interest, or reducing charges; reaching out to local partners to see if they can provide assistance in paying this bill; or using unrestricted funds to resolve the bill.

HVAC SERVICE AND REPAIR

1. **Can Subrecipients only provide utility assistance and choose to not provider services related to the repair of existing heating and cooling units?**
   No, CEAP contract stipulates that you will provide all possible activities of the CEAP program in order to make them available to households within your service area. Defining how, and when, certain assistance options are provided should be outlined in your Service Delivery Plan. Maximizing assistance to qualified households is the most efficient way for Subrecipients to fully expend their CEAP contracts on time.

2. **Under what conditions can Subrecipients address heating/cooling service or repairs?**
   For non-vulnerable households, HVAC service and repair may be addressed with CA funds when the household has an inoperable heating or cooling system and meets the associated crisis conditions, per TAC §6.310.
   For vulnerable households, HVAC service and repair may be addressed with UA funds any time the household has an inoperable heating or cooling system, per TAC §6.311.

Portable units such as window units, mini splits, etc. can be provided for any household who meets the definition of Life-Threatening Crisis. Please note that the purchase of more than 2 such units for a single household requires written TDHCA approval. If that scenario arises, please submit detailed justification via Wufoo so the Department can make a determination.

3. **What are the requirements for HVAC contractors to do the work?**
   Any and all contractors must be properly procured to do the work. Any contractors used for service/repair work should be properly licensed to do the work; pull all applicable permits to cover the requested scope of work; always run Manual J and Manual S calculations (an existing code requirement) to justify the sizing and equipment selection when applicable, and offer some sort of warranty on their work, as required per CEAP contract.

4. **Does the HVAC service and repair cap include an assessment charge to determine the type of repairs needed for the heating/cooling unit?**
   Yes, the cap includes everything associated with the service and repair of the existing heating and cooling units, which includes the initial assessment, labor, materials, and applicable permits, etc.

5. **How do Subrecipients know if a system and its components are repairable?**
   First, ensure that the existing system is inoperable or not working to its intended function (EX: an air conditioner blowing hot air). Using a qualified HVAC contractor to conduct a thorough assessment and make this determination is recommended.
   Second, acceptable heating/cooling repairs, not to exceed the allowable cap, under the conditions listed in TAC §6.310 and TAC §6.311 could include the repair of any of the components, or parts/pieces of those components listed above; repair of any of the three components, and/or repair/replacement of any of the parts/pieces of those components to make them functional and working again.
   Third, for households without a central HVAC system, such as those using portable units as their heating/cooling system, each unit would be considered as a component of their existing system and could be repaired under the same criteria as those used for central HVAC systems.

6. **Is repair/replacement to the duct system allowable under HVAC service and repair?**
   The duct system delivers the conditioned air throughout the house and is a component of the system, so yes, repair/replacement to the duct system is potentially allowable expenditure. Repair to the duct system would be covered under the allowable service/repair cap; all applicable justification and documentation (EX: photos and notes and/or diagnostic testing: duct blaster or pressure pan) is still required to support such decision. Repairs, or proper air sealing of the duct system should automatically happen when the HVAC work scope might impact the duct system; proper air sealing of the duct system (supply plenum) to the HVAC cabinet is extremely important and should be prioritized when applicable. When extensive duct repairs are needed and the cost cap becomes a concern, a referral to WAP for a whole-house assessment may be best.

7. **How does the Department define "not functioning according to its intended purpose" for repair/replacement of systems?**
   Documentation from a thorough assessment is essential to justify any repair/replacement work. If a system is currently inoperable (not working), the Subrecipient can repair or replace the system. Documentation must be collected/maintained to support this situation. Examples of a

thorough assessment would include information about what tests or diagnostics were run on the system to evaluate the system. Examples of unacceptable assessment documentation for replacement include but are not limited to old – needs replacement; bad – needs replacement; doesn't work – needs replacement.

If there are parts/pieces of the three HVAC components that are not operating functionally, then a repair is needed. If the parts/pieces are not able to be repaired to get the existing system back to an acceptable operable state, document the reason, then consider replacing the unit. The replacement unit must meet current Energy Star requirements. If Energy Star equipment is unavailable, document the reason, and purchase the highest rated unit available.

If the current existing system is currently operating at 80% or less of its original expected performance (AFUE/SEER), then repair or replacement could be done. If the unit is unable to be repaired, the replacement unit must meet current Energy Star requirements. If Energy Star equipment is unavailable, document the reason, and purchase the highest rated unit available.

8. **Is there any guidance on what is, or is not, an allowable scope of work for repairs associated with HVAC service/repair?**

   Repairs on the heating/cooling system are allowable within the cap, as defined within the TAC. Repairs that might be done on things outside of the actual heating/cooling unit (electrical work, plumbing work, carpentry work, etc.) must be necessary to ensure the quality of the installation meets program expectations. Justification for this additional work must be documented thoroughly and maintained in the client file; documentation should clarify why these repairs are reasonable and necessary to the installation, safe operation, or preservation of the heating/cooling system. If the scope of repairs requested are more extensive repairs, rehabilitation-type repairs, this might be considered outside the scope for this component of the CEAP program; if this is needed, other programs or fund sources might be better able to address the issue(s).

9. **What if the house does not have a conventional HVAC system, such as a central furnace and evaporative cooler or a wall furnace and window units? Is this considered a "central system?" Could the components of the furnace or cooling components be repaired or replaced?**

   Yes, service and repair in these scenarios is possible. Acceptable situations are:

   - *EXAMPLE 1:* Home has a typical HVAC system, with a furnace/air handler inside, and condenser outside. The HVAC system uses the duct system to heat/cool the house. In this case, repairing any aspects of those components, or possibly replacement of those 3 major components could be done in an effort to repair the central system.
   - *EXAMPLE 2:* Home has an evaporative cooler and a central furnace with duct systems to heat/cool the entire house. In this case, either of those heating/cooling components could be replaced individually in an effort to repair the central system.
   - *EXAMPLE 3:* Home has window air conditioners and a central furnace for their heat/cool system. Two window ACs could be replaced, and the furnace could be addressed as the heating component. Prior Department approval is needed if more than two window units are needed.

DISABILITY

1. **Are individuals able to self-identify as disabled? Is documentation required to support the disability? Can an applicant certify for a minor or other household member?**
   Applicants may self-certify themselves or members of their household as disabled on the application. Applicants can certify a disabled minor or another disabled household member when they sign the application. Doctor's notes are not to be requested.

LANDLORD VENDOR AGREEMENTS

1. **Can households paying their landlord for utilities be assisted through CEAP?**
   Yes, Subrecipients may make payments to landlords on behalf of eligible renters who pay their utility and/or fuel billed through their landlord. Subrecipients must have a signed vendor agreement with the landlord, and payments must be made directly to the vendor and not the tenant. Vendor agreements may be found on the Department website. Per TAC §6.312, vendor agreements are to be renewed at least every 2 years.

2. **Can an applicant renting a room receive utility assistance?**
   Yes, Subrecipients may assist an applicant who rents a room. However, you need to obtain a copy of the rental agreement that addresses utility responsibilities. The applicant's income would be based on their individual household size and income (not the occupants of the entire home). If the renter pays a monthly fee for their portion of the utilities, you need documentation of such and a vendor agreement with the landlord to pay the landlord.

PROPANE

1. **Can CEAP funds be used to repair propane gas lines or leaks?**
   No. Repair of gas lines and or leaks is not allowable with CEAP funds, but CEAP funds may pay for tank pressure testing, per TAC §6.310.

2. **Is assistance with propane or natural gas limited only to the months of November, December, January, and February?**
   No. There is no distinction as to what time of year that households that use bulk fuels are to be assisted. Each agency will need to review the household's 12-month billing history to determine which months would best benefit the household.

3. **Is assistance with propane limited to 250 gallons?**
   It depends on the component being used to provide the assistance with propane. If the household meets the crisis requirements, up to 250 gallons of propane can be provided using CA, up to the maximum benefit amount. If using UA to provide the propane assistance, there is no limit on the number of gallons, as long as the assistance does not exceed their maximum benefit allowance.

4. **Do we need propane consumption history to pay propane? Can we pay propane using the current bill provided by the propane company needed to refill the tank?**
   Yes. All utility pledges, propane or otherwise, must be made based on a 12-month billing history, a Department-approved Alternative Billing Method, or an actual monthly bill.

BUDGETS/REPORTING

1. **What are the Administration and Program Services Cost percentages?**
   The applied percentages are outlined in your CEAP Contract and may vary from year to year. These percentages are calculated based on the expenditure of direct service dollars. You can find the allowable contract budget expenditures in one of the Exhibits near the end of your contract.
   Typical Admin and Program Services costs are outlined within your contract, TAC §6.308, and the CEAP Admin and Program Services Costs guidance on our website.

2. **Can you begin expending funds from the CEAP supplemental contract or does the CEAP annual contract need to be fully expended?**
   The goal for both the CEAP annual contract and the CEAP supplemental contract is to have all funds spent by the end of the contract term (12/31/XX). The goal is to spend out, or at least fully obligate, the supplemental and smaller, contract first, then spend out the annual contract. The expectation is that both contracts are fully spent by 12/31/XX.

3. **Between the two CEAP components, UA & CA, is there a minimum percentage per component that must be expended by the end of the contract period?**
   The Department expects full expenditure by contract end date. There are no specific minimum per component. You could weigh one category more heavily than the other, based upon your area needs, as long as the total expended for both components does not exceed the total budgeted amount for Direct Services.

4. **Our 202X contract was extended through March 202X, do we assist households that were not assisted in 202X, or can we assist a household that already received assistance in 202X?**
   If your agency's program year follows the calendar year (e.g., 01/01/25-12/31/25), then any household receiving assistance in 2026 should be applicants, with an application and applicable income documentation from 01/01/26 or later, regardless of whether the assistance is paid using the extended PY25 contract or the current PY26 program year contract. Whether you choose to assist households previously assisted in the prior program year contract or households that have not previously assisted is completely up to your internal policies and procedures.

5. **When is the CEAP Budget Amendment Form required?**
   Budget amendment form *is* required when:
   - Moving unused Admin funds to client direct services (UA and/or HC)
   - Moving unused Travel funds to client direct services (UA and/or HC)

   Budget amendment form *NOT* required when:
   - Moving funds between client direct services (UA and HC)
   - Moving unused Program Services funds to client direct services (UA and/or HC)

   Admin, Program Services and Travel are capped budget line items. You cannot increase these line items; you can reduce them and move into direct client services, but you cannot increase them.

6. **Why is the final reporting due date 45 days?**
   The final date is 45 days in order to conduct contract close-out activities, such as invoices from

vendors, contractors, suppliers, and final expenditure and performance reporting.

7. **Within the contract system, can we have multiple designees for approvals of amendments and monthly reports?**
   Yes. Subrecipients should submit an Access Request for anyone needing contract system access.

8. **Who do I contact with reporting questions?**
   The contact information for Community Affairs staff can be found here.

PROCUREMENT

For procurement questions, please refer to TAC §1.404 and the Department's CA Procurement webpage.

1. **Could Subrecipients use the WAP contractor to complete CEAP heating and cooling work without going through procurement?**
   Potentially. All HVAC service and repair vendors must be properly procured following the process outlined on the Department's procurement webpage. Allowability depends upon how the procurement process for the contractor was documented. If the procurement bid package included both the WAP and CEAP programs, or was procured for all Subrecipient programs, then you may use that contractor. If not, then a separate procurement would be required.

2. **Who do Subrecipients contact to get approval for procurement?**
   Department training staff. According to TAC §1.404, vehicles require prior written Department approval. Any vehicle purchased without approval may result in disallowed costs. Additionally, certain equipment and capital expenditures might require prior written approval from the Department as outlined within 2 CFR §200.439 and/or the "Procurement Standards" section of your program contracts. Examples include general purpose equipment, buildings, land, special purpose equipment, etc.