#### **Comprehensive Energy Assistance Program (CEAP)**

(Updated February 2023)

For information regarding income calculations, please refer to the Department's <u>Frequently Asked Income</u> <u>Questions</u> 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. The document contains answers to the questions the Department has received that are relevant to the network. 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, WAPTAC, 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: <a href="https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/">https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/</a>

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

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### Comprehensive Energy Assistance Program (CEAP)

(Updated February 2023)

#### A. GENERAL

### What is the CEAP prioritization process? Should we wait to serve non-vulnerable households until we have served all vulnerable households?

10 TAC §6.307(e) 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 should be the highest rated item in sliding scale priority determinations. Please maintain a priority rating sheet and documentation of the use of the criteria. Your agency policy should dictate how you prioritize services to households based on their priority rating. Prioritization should be dependent upon demand and available funds, and this process should be outlined within your annual Service Delivery Plan.

#### Can agencies conduct all CEAP business by mail instead of going to sites to accept applications?

No, Subrecipients cannot only use mail. Utilizing online applications can increase internal efficiencies and save time for both the client and the Subrecipient staff. Additionally, Subrecipients are to provide multiple means for application submissions and must make reasonable accommodations for home-bound individuals.

# 10 TAC §6.309(i)(8) 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 exactly 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 10 TAC §6.309(i)(5). The Department recommends that Subrecipients contact the vendor to see if either the deposit requirement can be waived entirely, or if it can be waived with an advance payment. Subrecipients may apply the advance payment option to the UA Component.

### We want to provide services as soon as possible in January. Can we start accepting applications for the new program year in December?

Subrecipients can distribute upcoming year applications in advance. However, 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. Subrecipients may also 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 identification of any household members who are no longer residing in the residence. Subrecipients are highly encouraged to maximize the capabilities of their client software to allow for quick updates to applications for returning clients from previous program years.

### Can we use faxed copies of CEAP applications? Or initials for signatures? What about electronic signatures on applications?

Faxed and electronic copies of applications and documents are acceptable. Electronic signatures are acceptable, but initials alone cannot be substituted for a signature. Currently, the COVID-19 Client Signature Flexibility form may be utilized in lieu of a signature on an application, Household Status Verification form or Declaration of Income Statement when taking applications over the phone or in other scenarios in which a client cannot provide a signature. Notice will be provided to the network when the

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

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COVID-19 flexibilities are rescinded.

### In an effort to save money, can Subrecipients use electronic files?

The Department encourages Subrecipients going paperless as long as all the appropriate information is gathered and retained. Additionally, <u>2 CFR 200.333-.337</u> addresses record keeping requirements. Specifically, in 200.335, it outlines the option of original documents being generated electronically and there being no need to create and retain paper copies. The Department reminds the network that electronic files would require some things that need to be 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).
- Any other applicable safeguard for the files.

#### Can we assist a household with their bill if it 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. Ensure sufficient client file documentation to clarify the situation for future monitoring purposes.

When applicants come in during the early part of the year, their bills often have charges based on usage during the previous program year. Can we assist them with these bills even though they contain charges accrued before the beginning of the program year?

Yes. If the household is eligible, you can assist them in paying their current or current and arrears, even if they were accrued in the previous program year.

### How do we 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.

An applicant was denied on their initial CEAP application due to being over income. This applicant has now reapplied stating that a new person is living in the household. We are concerned that this applicant may have changed her reported circumstances solely to qualify for assistance. How should we handle this situation?

Aside from following your agency policies associated with how frequently clients may reapply for services, 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.

#### How should we handle applicants who wish to reapply after a denial?

Subrecipients are encouraged to have a policy on how often a household can apply, such as requiring denied applicants to wait 30 days prior to reapplying. If your agency has such a policy, you need to follow that policy before accepting a new application for this household.

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### A. 10 TAC §6.309 — TYPES OF ASSISTANCE AND BENEFIT LEVELS

#### What are current maximum benefit allowances? Are they per contract or per component?

Per 10 TAC §6.309, the maximum benefit allowances for all CEAP contracts are as follows:

- Household with incomes of 0-50% of the Federal Poverty Guidelines may receive an amount not to exceed \$2,400 per component;
- Household with incomes of more than 50% but at or below 75% of the Federal Poverty Guidelines may receive an amount not to exceed \$2,300 per component;
- Household with incomes of more than 75% but at or below 150% of the Federal Poverty Guidelines may receive an amount not to exceed \$2,200 per component;

The benefit allowances are per component (UA and CA), across contracts. These allowances are the maximum you may spend per household per component, whether you are using ARPA funds, regular CEAP funds, or a combination of the two. Additionally, all households are eligible for up to \$7,500 in HVAC service and repair assistance.

#### 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 of \$2,200 per component.

### 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 <u>10 TAC</u> §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. Keep in mind that for income eligibility determination, there is no rounding of the percent of Federal Poverty Guidelines.

### Non-vulnerable households can receive up to six payments; do we pay current bill and arrears PLUS six payments? Or is it current and arrears and up to five additional payments?

The initial bill, or current and arrears, is considered the first payment. You may then pledge up to five more payments, within the maximum benefit allowance, within the program year.

#### B. 10 TAC §6.311 — UTILITY ASSISTANCE (UA)

### 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  $\underline{10}$   $\underline{TAC \S 6.309(i)(1)(A)}$ ; or (2) pay monthly.

#### When pledging UA for vulnerable households, is there a limit on the number of payments?

For vulnerable households, assistance is allowable up to the maximum benefit allowance, with no limit on the number of months to cover within the program year. Only non-vulnerable households are limited to just six months of payments per program year, as outlined in 10 TAC §6.309 (i)(1)(B and C).

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### Under the UA component, does the Subrecipient commit pledged funds at the time of enrollment in program or does we have to wait for recipients to request assistance every month?

Subrecipients can fully commit UA based upon the previous 12 month's billing history <u>or</u>, if unavailable, should base payments on current bill and Department-approved Alternative Billing Method, not to exceed the maximum benefit allowance. When the pledge payment made is up to the Subrecipient; 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.

### If an electric vendor tells us that 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 unfortunately. With that said, paying monthly is the next best option to ensure the income-qualified client receives the maximum benefit possible. Getting the client to provide the current monthly bill as efficiently as possible would be an important piece to minimize caseworker backlog/interruption.

### Can we pay two fuel sources for clients? For a 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 10 TAC §6.309(i)(1)(B and C). Count this as one month's payment. Select the 6 months that have the highest total of the two fuel sources.

### 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 <u>NOT apply it only to "home energy" costs, then the lump sum payment flexibility is NOT an option for this vendor</u>. Subrecipients can continue to make monthly payments, per usual CEAP UA processes, in compliance with the TAC. Getting the client to provide the current monthly bill as efficiently as possible would be an important piece to minimize caseworker backlog/interruption.
- If the vendor will accept a lump sum payment and ensure they will apply it only to "home energy" costs, then the new lump sum payment flexibility is an option for this vendor.

### If a household applies and they have a credit or zero balance at the time of application, how do we determine benefits for their first month of assistance?

CEAP can only pay charges that are outstanding and in immediate need, per <u>TAC §6.302</u>. If nothing is currently owed, or they have an existing credit, there is no immediate need. Clients should re-apply when they have a need for assistance.

# 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. Maximum benefits and payments start over January 1 of every program year regardless of what occurred in the previous program year.

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# If a household is in an average billing plan with their company, are their benefit amounts based on their billing history or under the ABM? Would they have to remove themselves from the plan with their company?

If they have a 12-month billing history, use the monthly consumption to determine the level of assistance. Otherwise, utilize your Department-approved Alternative Billing Method. How the payout and future pledges are made, would be determined at the local level, according to your Service Delivery Plan.

### Are we able to assist with households who have a pre-paid electric account?

Yes. Monthly pledge amounts would be determined using the available 12-month billing history or your Department-approved Alternative Billing Method. However, you cannot go back and credit what they already paid.

#### Are late fees to vendors an allowable program expense?

Late fees are considered penalties or fines as identified in 10 TAC §6.309(i) and are not allowable.

### What is the process for developing a "Department-approved Alternative Billing Method?"

Instructions for completing the Alternative Billing Method are updated annually in the Service Delivery Plan guidance. A Subrecipient's Alternative Billing Method is to be submitted each fall and approved annually by the Department for use in the subsequent program year.

# 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 we help them?

If the client's service is not at risk of disconnection, you may assist with UA funds, within the allowable benefit levels. 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. CSBG funds may be used for those who cannot verify citizenship or qualified alien status.

### C. <u>10 TAC §6.310</u> — CRISIS ASSISTANCE COMPONENT (CA)

### 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
- inoperable heating/cooling system

Examples of conditions that would be considered as "in immediate danger of losing service" include:

- a disconnect notice
- less than \$30 remaining in a pre-paid account
- propane low reserve of fuel (under 20% remaining)

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#### 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 10 TAC §6.310(a):

- Extreme Weather Conditions
- Disaster
- Life-Threatening Crisis

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

### 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.

### 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  $\underline{10}$   $\underline{TAC \S 6.310(a)}$ , as their approved benefit amount will allow.

### Can we 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  $\underline{10 \text{ TAC } \$6.310(c)(6)}$ . For non-vulnerable households, this is permitted under CA, if they meet crisis criteria, per  $\underline{10 \text{ TAC } \$6.310(c)(5)}$ . For vulnerable households, if a heating or cooling system is nonexistent, purchase of heating or cooling units for up to \$7,500 is allowed under UA, per  $\underline{10 \text{ TAC } \$6.311(c)}$ .

### Under Crisis Assistance, if it is determined that a repair of existing heating and cooling equipment is necessary to resolve the crisis, how long do we have to repair/replace component(s)?

<u>10 TAC §6.310(a)</u> 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.

### What sort of approval process would we need from the Department in order to purchase blankets if we meet the definition of a crisis?

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. This is necessary in order to purchase blankets under CA. Ensure the situation meets the crisis conditions outlined in 10 TAC §6.301(b)(3) and 10 TAC §6.310(c)(4). Second, documented proper procurement of 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.

### Can we 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  $\underline{10}$   $\underline{TAC \S 6.310(c)(2)}$ . Normal deliveries of propane should be handled under the UA component.

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### Can we only serve households with CA payments using the extreme weather conditions during certain months?

Yes, extreme weather conditions only apply during the winter and summer months identified in <u>10 TAC §6.301(b)(4)</u>, and only households with a disconnect or disconnect notice may be served with CA during those months once extreme temperature triggers are met. Review the temperature triggers outlined in your annual Service Delivery Plan.

# 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? If not, will a verbal certification suffice?

Per 10 TAC §6.301(b)(5), 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.

#### D. HVAC SERVICE AND REPAIR

### Under what conditions may we 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  $\underline{10}$   $\underline{\text{TAC } \$6.310(c)}$ . For vulnerable households, HVAC service and repair may be addressed with UA funds when the household has an inoperable heating or cooling system, per  $\underline{10}$   $\underline{\text{TAC } \$6.311(c)}$ .

### 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. Maximizing assistance to qualified households is the most efficient way for Subrecipients to fully expend their CEAP contracts on time.

### Does the HVAC service and repair cap of \$7,500 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, and materials.

# Can you please define what are the acceptable heating and cooling units allowable for repair under CA? First, ensure that the existing system is inoperable. Systems that are working cannot be repaired using CEAP funds, even if the working system is old or inefficient, per 10 TAC §6.309 (f).

There are three main components of a central HVAC system – condenser (AC component, typically outside); furnace (heating component, typically located in the air handler); blower (fan that blows the conditioned air throughout the house, typically located in the air handler). The heating/cooling components both utilize the blower of the system. Additionally, these three components have smaller parts/pieces that they need to operate functionally – parts, valves, hoses, pipes, etc. Acceptable heating/cooling repairs, not to exceed \$7,500, under the conditions listed in 10 TAC §6.310(c)(5) and 10 TAC §6.311(c) could include the repair of any of the components, or parts/pieces of those components

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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.

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.

Regarding the procurement for the aforementioned services, the Department recommends Subrecipients contact other Subrecipients in the local area to get an understanding of what repairs are applicable/common in your service area to make sure that the procured services will be able to provide the most effective and beneficial assistance to the households. All HVAC service and repair vendors must be properly procured following the process outlined on the Department's procurement webpage: https://www.tdhca.state.tx.us/community-affairs/procurement/index.htm.

#### Is repair to the duct system an allowable CEAP program expenditure under CA?

The duct system delivers the conditioned air throughout the house and is a component of the system, so yes, repair to the duct system is potentially allowable program expenditure under CA. Repair to the duct system would be covered under the \$7,500 service/repair cap for CA; all applicable justification and documentation is still required. In such cases, a referral to WAP for a whole-house assessment may be best.

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.

#### **E. DISABILITY**

Will individuals be 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, per 10 TAC §1.24. Applicants can certify a disabled minor or another disabled household member when they sign the application. Doctor's notes are not to be requested or kept in client files.

### F. LANDLORD VENDOR AGREEMENTS

#### 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

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and/or fuel billed through their landlord. <u>Subrecipients must have a signed vendor agreement with the landlord</u>, and payments must be made directly to the vendor and not the tenant. Vendor agreements may be found on the <u>Department website</u>. Per <u>10 TAC §6.312(a)</u>, vendor agreements are to be renewed at least every 2 years.

#### An applicant is renting a room and is requesting utility assistance. Can we assist them with CEAP?

Yes, you may assist an applicant who rents a room. However, you need to obtain a copy of the rental agreement and it would need to address 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.

#### G. PROPANE

#### 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 10 TAC \$6.310(c)(2).

### Is assistance with propane or natural gas limited only to the months of November, December, January, and February? Propane is not used to cool the home.

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.

#### 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.

### 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?

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. A 12-month billing history for propane will not consist of an amount for each month as other utility bills do, since clients do not purchase propane in monthly quantities. However, Subrecipients' Alternative Billing Method should include data collected from propane bills over the past 12 months as billing history.

Does being out of propane or low on propane (below 20% supply, per the customer) meet the definition of "in immediate danger of losing service?"

Yes.

### H. BUDGETS/REPORTING

What are the Administration and Program Services Cost percentages?

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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 Exhibit A of your contracts.

### Does CEAP intake include processing and determining pledges? Can you provide an overview of what is allowable under Admin and Program Services costs?

Any aspect for providing direct services falls under Program Support. Please review your contract, <u>10 TAC</u> <u>\$6.308</u>, and the CEAP Admin and Program Services Costs guidance <u>here</u>.

### 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.

### 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.

### Within the contract system, can we have two designees for approvals of amendments and monthly reports?

Yes. The Subrecipient would need to submit an Access Request with both of the individual's names listed to the Department.

#### Who do I contact with reporting questions?

The contact information for the above staff can be found here.

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#### I. PROCUREMENT

For procurement questions, please refer to 10 TAC §1.404 and the Department's CA <u>Procurement</u> webpage.

### For the purchase of multiple office supplies which will total more than \$500, do we need to go through separate procurement and get three bids?

Subrecipients can use any variety of procurement methods. The micro-purchase method for services, supplies, or equipment, has a cap of \$3,000 in aggregate or less. Small purchase or competitive bid are also options. Please visit the <u>Procurement webpage</u> for further details.

### Could Subrecipients use the WAP contractor to complete CEAP heating and cooling work without going through procurement?

Potentially. 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.

### Who do we contact to get approval for procurement?

<u>Department training staff</u>. According to <u>10 TAC §1.404</u>, 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.