

From: Sergio Hernandez [mailto:shernandez@capk.org]
Sent: Thursday, November 10, 2016 11:09 AM
To: Frevert, Kathy@Waterboards
Cc: Romala Ramkissoon; Loretta Andrews
Subject: Comments on Low-Income rate assistance

Kathy,

Hello, I have attached information regarding the Drought Water Assistance Program (DWAP) which was a water rebate program in 2014 and 2015. We participated in this program from Community Services and Development. I believe it is a good model to follow to target low income families.

The contact for this program was:

Wilmer Brown and Sukie Montes

'Wilmer. Brown@CSD. CA. GOV' (Wilmer.Brown@CSD.CA.GOV)

Montes, Sukie@CSD Sukie.Montes@CSD.CA.GOV

Just in case you would like to make contact regarding the program, outcomes, and statistics of the program.

Thanks,

Sergio Hernandez
Community Action Partnership of Kern
Utility Assistance Coordinator
300 19th Street
Bakersfield, Ca 93301
(661) 578-6423
(661) 336-5236 fax

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DWAP Frequently Asked Questions

Questions	Answers
1. Is there a limit to the amount the program can pay?	Per the contractual agreement , (Exhibit A, Section 3.D.2) "The maximum amount of any water bill assistance benefit provided shall not exceed three (3) months of the participants' monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater."
2. Is there a limit to the number of times clients can receive this service (1 month, 2, 3?)	The client may receive water bill assistance one time not to exceed three (3) months of the participants' monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater."
3. What will satisfy the requirement to educate clients on water conservation: 1) Workshops, 2) providing them with educational materials and for clients to sign acknowledgement receipt? Either or?	Per the contractual agreement, "(Exhibit A, Section 3, Letter E) the "Contractor shall provide all recipients of DWAP with applicable water conservation education information. Water conservation education information should be in writing describing water saving behavioral adjustments that will decrease the water consumption of the house hold.
4. Can these funds be used for staff time to process applications and determine eligibility? If so, what amount?	Per the contractual agreement, (Exhibit A, Section 2, Letter B, number 2) "support cost for outreach, intake and water conservation education shall be limited, in the aggregate, to 10% of the total DWAP pilot budget and shall be reasonably apportioned as Contractor deems necessary and appropriate."
5. Can these funds be used for Administrative costs?	Per the contractual agreement, (Exhibit A, Section 2, Letter B, number 1) "Administrative Costs shall not exceed 10 % of the total DWAP pilot budget and expenditures. Contractors shall use DWAP administrative funds exclusively for the DWAP pilot. No DWAP funds may be used to supplement or cover expenses under any other

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	CSBG program. “
6. Where would I be able to find the Community Services and Development Drought Water Assistance Program Intake Form CSD Form 818 (04/2014)?	The CSD 818 DWAP Intake form is located on the CSD provider’s website under CSBG forms tab in English and in Spanish. (https://providers.csd.ca.gov)
7. Please clarify the poverty level for the Drought Water Assistance Program?	Per the contractual agreement, (Exhibit A, Number 3, Letter B) “Individuals or households wishing to participate in the DWAP pilot must meet CSBG income eligibility requirements. Income verification must cover a period of at least 1 month prior to date of application.” CSBG income eligibility requirements for DWAP pilot states that clients must be at 100% of the poverty level.
8. What if a utility entity will only turn water back on or continue service if the entire past due charge (for water, sewer & garbage) is paid?	Agencies may only utilize Drought Water Assistance Program DWAP pilot funds for water utility assistance. Before issuing a water bill payment, agencies should determine if client can come up with the remaining balance or make a payment arrangement with the utility company.
9. Will Drought Water Assistance Program DWAP cover reinstatement fees (in the range of \$70 - \$150) to turn water back on, in addition to current and past due water bill (up to 3 months assistance) if someone’s water bill has already been shut off?	The DWAP assistance benefit may pay for reinstatement fees to turn water back on, current and past due water bills. For verification, the applicant must provide copies of water bills and/or shut off notices for the current month, plus water bills for up to two previous months. The DWAP client benefit including the reinstatement fees must not exceed (3) months of the participant’s monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater.
10. Are we required to have any disclosures on DWAP propaganda? CSD logo, etc.?	No, agencies are not required to have any disclosures on DWAP propaganda, logos, etc.
11. Are agencies allowed to also do video presentations to participants on water conservation education?	Video presentations are acceptable. Per the contractual agreement, (Exhibit A, Number 3, Letter E) “contractors shall provide all recipients of the DWAP with applicable water conservation

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	education information. Water conservation education information shall be in writing describing water saving behavioral adjustments that will decrease the water consumption of the household.”
12. Where would I be able to find the Spanish version of the CSD 818 Intake form?	The Spanish version of the CSD 818 Intake form is located on the CSD provider’s website under the CSBG forms tab. (https://providers.csd.ca.gov)
13. For a utility company that itemizes water, sewer and solid waste fees separately in its billing statement, will DWAP only cover water, or can it also cover sewer costs and/or solid waste (garbage/container charge)?	Per the contractual agreement, (Exhibit A, Number 1, Letter A) “...for purposes of providing water bill assistance and water conservation education to eligible participants and families...” Agencies may only utilize DWAP funds for water utility assistance. Utility assistance for sewage and solid waste are not covered under the DWAP pilot.
14. Has the sample MOU been drafted and sent to providers yet?	The sample MOU was distributed July 23, 2014 via email and posted to the provider’s website. (https://providers.csd.ca.gov)
15. Some landlords integrate the water bill as part of their rent so they don’t receive a water bill statement. If a landlord provides a client with a written statement on their water bill share, would that suffice to assist them with water bill assistance service? Is the check made out to the landlord or the client?	A written statement from their landlord would be acceptable to provide water bill assistance services. In this situation the check would be made to the client.
16. For audit purposes, may agencies create their own eligibility determination sheet to ensure that applicants are approved accurately according to the DWAP contract agreement since the funds are very limited? (criteria: 2014 CSBG poverty income guidelines, water bill status, & proof of household effected by the drought) Supporting documents will be included in the applicant’s file.	Yes, agencies may create their own income eligibility sheet for the DWAP pilot as long as it captures the necessary information required by the contract.
17. Aside from submitting the modified CSD 295 CCR, what other reporting documents are agencies required to submit to CSD?	Per the contractual agreement, (Exhibit A, Number 2, Section C) “ For purposes of the DWAP Pilot, contractor shall complete a CSBG/NPI Programs Report (CSD 801) Supplemental to NPI

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	<p>6.2 for the program period from June 1 through December 31, 2014. The NPI programs Report must be submitted via email no later than January 20, 2015, to CSBGReports@csd.ca.gov.</p> <p>In accordance with Contractor’s current elected billing cycle of the CSBG Agreement, Contractor shall submit a monthly or bimonthly CSBG programmatic data Client Characteristics Reports for Drought Water Assistance Program (CSD 295 D-CCRDWAP).”</p> <p>Agencies are also required to submit a Weekly Status reports to stay abreast on program implementation and challenges, which is due every Friday at COB.</p>
<p>18. Is it acceptable for agencies to apply a one-time payment of \$60 for qualifying households as long as it does not exceed the allowable water assistance benefit?</p>	<p>The benefit amount is at the discretion of the agency. Approved clients receiving services from the DWAP pilot are eligible for the maximum amount of water bill assistance benefit not to exceed three (3) months of the participant’s monthly water payment.</p>
<p>19. May agencies serve clients that cannot show proof of citizenship?</p>	<p>Agencies may serve clients that are unable to show proof of citizenship because CSBG funds are federally exempt from citizenship verification.</p>
<p>20. Are we required to collect proof of income for the last 30 days?</p>	<p>Per the contractual agreement, (Exhibit A, Section 3, Letter B)”individuals or households wishing to participate in the DWAP Pilot must meet CSBG income eligibility requirements. Income verification must cover a period of at least one (1) month prior to date of application.”</p>
<p>21. Clients in San Juan Bautista have their water contaminated with Nitrates and are unable to consume water and must rely on bottled water. Are agencies able to pay a water subsidy since many of the clients in this area have their water included in rent?</p>	<p>CSD DWAP funds cannot be used to provide bottled water.</p>
<p>22. One of the provisions from the MOU states: <i>No later than [day to be determined] each month, Water Co. agrees to provide CAAAC with monthly</i></p>	<p>Per the contractual agreement, (Exhibit A, Number 3, Letter A) “...Forthcoming DWAP pilot Guidance will include a sample Memorandum of</p>

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<p><i>statements or reports showing all DWAP payments received and the customer accounts credited.</i></p> <p>23. If an agency must have all MOU's approved by the County Board of supervisor's and the earliest date of approval would be August 19, is the use of the MOU really necessary? Essentially, this approval time would delay the process of providing services to the clients.</p>	<p>Understanding (MOU) template for optional use if Contractor has not previously established MOUs with utility companies." Agencies are not required to have MOU.</p>
<p>24. What is the total amount allowed to pay for a single client water bill? A client requested service after their water was shut off and a \$200 reinstatement fee was also applied to turn their water back on. With past due fees, their total bill is \$1,100. Is there a maximum amount to pay? Can funds be used also to pay for the security deposit for those whose water has been shut off?</p>	<p>The DWAP assistance benefit may include reinstatement fees to turn water back on and past due water bills. The DWAP client benefit including the reinstatement fees must not exceed (3) months of the participant's monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater.</p>
<p>25. Agencies are allowed to pay for up to 90 days of water bill service, but some combinations of months total more than 90 days. For example, if a customer presents an April, May and June bill with their application, the total billing days for those months will be 91 days. If a customer brings in bills for May, June and July, the total billing days for those bills will total 92 days. When the benefit payment is calculated, should the cost for 1 or 2 days be deducted from the sum of the three bills to ensure that we are only processing payment for a 90 day billing cycle?</p>	<p>Approved clients receiving services from the DWAP pilot are eligible for the maximum amount of water bill assistance benefit not to exceed three (3) months of the participant's monthly water payment. Agencies are not required to make deductions based on the amount of days in the 3 month period.</p>
<p>26. Does the client's water bill need to be "unpaid" in order for an agency to provide assistance? If so, consequently, customers will not pay their water bills and wait until they are three months behind before they apply and funding will be limited.</p>	<p>Clients are not required to have unpaid water bill in order to receive service. Per the contractual agreement, (Exhibit A, Section D, number 1) "assistance under the DWAP Pilot may be used to pay for participants' current amount due, to offset account balances in arrears, and/or to pay amount(s) necessary to prevent imminent shutoff up to the maximum available benefit."</p>

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<p>27. For audit purposes, please provide an example of what forms are acceptable to show proof of household member or members being affected by the drought?</p>	<p>The CSD 818, Drought Water Assistance Program Pilot Intake Form contains mandatory questions that must be answered. Checking the applicable sections and signing the intake form is acceptable to demonstrate drought impact. The CSD 818 form is located on the providers' website at (https://providers.csd.ca.gov).</p>
<p>28. Do we have to have a written affidavit from <i>applicant or household member living in the home</i> stating that he or she lost their job or reduced hours due to the drought?</p>	<p>An agency is not required to have a written affidavit. The CSD 818, Drought Water Assistance Program Pilot Intake Form contains mandatory questions that must be answered. Checking the applicable sections and signing the intake form is acceptable to demonstrate drought impact. The CSD 818 form is located on the providers' website at (https://providers.csd.ca.gov).</p>
<p>29. Is there a form available for use if the applicant is unable to provide proof of employment being drought affected? (i.e. <i>Some field workers and other type of employment professions do not receive an actual check; they receive cash so employment verification is difficult.</i>)</p>	<p>The CSD 818, Drought Water Assistance Program Pilot Intake Form contains mandatory questions that must be answered. Checking the applicable sections and signing the intake form is acceptable to demonstrate drought impact. The CSD 818 form is located on the providers' website at (https://providers.csd.ca.gov).</p>
<p>30. In regard to the CSD 818 Intake form, May anyone in the household 18 and over be the applicant if he or she is not on the water bill?</p>	<p>Anyone in the household 18 or over may be the applicant even if he or she is not on the water bill. The applicant must provide documentation that substantiates he/she resides in the household.</p>
<p>31. If the person named on the water bill does not live in the household, but applicant's water bill service does match other supporting documents that he/she and other household members do reside there, can we accept the application?</p>	<p>Application may be accepted by an individual whose name is not on the water bill. The applicant must provide documentation that substantiates he/she resides in the household.</p>
<p>32. If the applicant or the whole household is unable to remember his/her social security number or provide proof of SSI number, will you be able to assign a temporary number for the potential applicant? If no number is provided, can we deny the application?</p>	<p>The application may still be accepted because a Social Security number is not required to receive services under the DWAP pilot program.</p>

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<p>33. Can we pay current water bill amount, not the total balance, if, there is no danger of water service being turned off?</p>	<p>Per the contractual agreement, (Exhibit A, Section D.1) "DWAP pilot may be used to pay for participants' current amount due, to offset account balances in arrears..."</p>
<p>34. Can we pay a dollar amount to prevent water shut off, but not to exceed 3 months of the applicant's monthly water payment?</p>	<p>Per the contractual agreement , (Exhibit A, Section 3.D.2) "The maximum amount of any water bill assistance benefit provided shall not exceed three (3) months of the participants' monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater."</p>
<p>35. Do we look at the current balance or total balance of the last current 3 month water bill?</p>	<p>Per the contractual agreement , (Exhibit A, Section 3.D.2) "The maximum amount of any water bill assistance benefit provided shall not exceed three (3) months of the participants' monthly water payment, whether billing is fixed/balanced or based on actual monthly usage, whichever is greater."</p>
<p>36. If it only takes only 3 months of water bill to prevent shut off, do we only pay up to the 3 months?</p>	<p>The benefit amount is up to the discretion of the agency, but all qualifying participants are eligible to receive a maximum benefit not to exceed 3 months.</p>
<p>37. Additional cost items are included in water bills, such as sewer and other cost items, but we should only pay the water portion. Correct?</p>	<p>Agencies may only utilize Drought Water Assistance Program DWAP pilot funds for water utility assistance. Agencies should discuss with the applicant the ability to pay the remaining balance and/or can coordinate with the water utility company to identify if payment arrangements are acceptable.</p>
<p>38. If water is included in rent, can we use our own agency form or do you have a form already created?</p>	<p>Agencies may use an agency developed form for water bill included in rent.</p>
<p>39. Are we allowed to use our own agency's Conflict of interest form, or do you have a form already created?</p>	<p>Agencies may use an agency developed conflict of interest form.</p>

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40. Proof of income: Can we use CSD 43B form for household members that cannot provide proof of income?	Yes, agencies may use the CSD 43B form for household members that cannot provide proof of income.
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Drought Water Assistance Program Pilot Intake Form

CSD 818 (04/2014) **DRAFT**

Agency:		Intake Initials:	Intake Date:	Eligibility Cert Date:
First Name	Middle Initial	Last Name		
Mailing Address <input type="checkbox"/> Check if same as service address				Unit Number
Mailing City		Mailing County	Mailing State	Mailing ZIP Code
Service Address (Do not use P.O. Box)				Unit Number
Service City		Service County	Service State CA	Service ZIP Code
Social Security Number (SSN):			Telephone Number: ()	<input type="checkbox"/> Message Only?

PEOPLE LIVING IN HOUSEHOLD

Enter the **total number of people** living in the household, including the applicant -->

Enter the number of people who are:

Ages 0-5	
Ages 6-11	
Ages 12-17	
Ages 18-23	
Ages 24-44	
Ages 45-54	
Ages 55-69	
Disabled	
Seasonal Farmworker	
Migrant Farmworker	

INCOME

Enter the **total number of household members** who receive income -->

Enter total gross monthly income for all people living in the household:

TANF	\$
SSI/SSP	\$
Social Security	\$
Pension	\$
Gen. Assistance	\$
Unemployment	\$
Employment	\$
Other	\$
TOTAL INCOME	\$

PAYMENT DETAILS

What is the total cost of the water bill?

Name of water utility company:

Account Number:

Name of customer on the water bill:

Check here if your water bill is included in your rent.

* Questions 1-4 (below) are MANDATORY fields.

1. How were you directly impacted by the drought? (Check all that apply)

Loss Job Loss Agricultural Job Other _____

2. Do you currently have a past due water bill? YES NO

3. What is your housing status? Renter Home Owner

4. Is your water currently shut off? YES NO

Applicant: Do not fill out the information in the shaded region. This section is for office use only.

What is the amount of water bill assistance benefit?	\$
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The information on this application will be used to determine and verify my eligibility for assistance. My signature gives consent for this information to be shared with other offices of the state and federal governments, their designated subcontractors, my utility company(ies), and for my utility company(ies) to share my account information with the Department of Community Services and Development (CSD), its designated subcontractors, and other offices of the state and federal governments for the purpose of providing services to me and to coordinate, improve and reduce the costs of services under these programs.

Applicant's Signature Date Witness' Signature (if signed with an X)

PURPOSE: The information you provide will be used to decide if you are eligible for a CSD's Drought Water Assistance Program. GIVING INFORMATION: This program is voluntary. If you choose to apply for assistance, you must give all required information. OTHER INFORMATION: CSD uses statistical definitions from the annual update of the Department of Health and Human Services' State Median Income, Federal Income Poverty Guidelines, to determine program eligibility. ACCESS: CSD's designated subcontractor will keep your completed application and other information, if used, to determine your eligibility. You have the right to access all records holding information about you. CSD does not discriminate in the provision of services on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation.

