

or electricity as the primary heat source. It appears, however, that this bill is not limited to those households.

SENATE BILL 5505 AN ACT CONCERNING ELECTRIC RATE RELIEF

The Department of Social Services notes that Section 1 of House Bill 5505 is the same as Senate Bill 460. We refer the Committee to our comments above on SB 460. In addition, we will provide comments on Section 39 and 40 of the bill.

Section 39 requires community action agencies (CAA) that administer fuel assistance programs accept applications year round within available funding. DSS has already been looking at the feasibility of having the CAAs accept year round applications. In addition, the Low-Income Energy Advisory Board (LIEAB) has formed a subcommittee to review the process of streamlining CEAP/CHAP and the concept of "year round" applications has been included as one of the possible options. There are many different ideas of what "year round" applications could mean and there will have to be a determination as to the best process for accomplishing this.

Regardless, at the present time the state does not have the additional funding resources that will be required to implement such a change and therefore the department opposes this provision. Moreover, there is a limit in LIHEAP on the amount of dollars that can be allocated for administration, and the entire CAA share is spent during the time the program is currently open. There is no question that keeping the program open year round would inevitably require more staff. Currently, some CAAs hire seasonal/part-time staff during the season to handle the additional volume.

Finally, we are concerned that by putting program operation procedures into statute, we reduce the flexibility to respond quickly in a changing environment. Therefore, while the department is not opposed to the idea, indeed it is already being considered, we are concerned about the implications of putting such a requirement in state statute.

Section 40 requires LIEAB to report on 1) a process for households with elderly and disabled members to self-certify for energy assistance program eligibility and 2) outreach programs that will increase participation in energy assistance and conservation programs.

DSS is concerned that LIEAB is charged with reporting on a program that is administered by DSS. We do not believe that this appropriately falls within the charge of the board pursuant to 16a-41b.

With regard to a process for applicant self-certification, the department has several concerns. First, the application process for energy assistance at the CAA is a primary gateway to other integrated services needed to improve the lives of clients, including the elderly and disabled. These additional services, linked through such initiatives as

Assurance 16 and Human Services Infrastructure, are facilitated through face-to-face interaction between customers and CAA staff. While self-certifying applications would perhaps be more convenient for some customers, they would be unknowingly shortchanged out of potential additional assistance that could be provided to them.

Furthermore, program integrity would likely be compromised through any proposed self-certification process. Caseworkers at CAAs serve as much more than automatons processing paperwork. They assist applicants with understanding the energy assistance program requirements and also ensure that all relevant income and household information is complete and accurate before benefits are awarded. The department is concerned that self-certification exposes the program to great potential for fraud and abuse. We are not aware of any state where applicants are allowed to “self-certify” their eligibility for the program, although some accept applications by mail or online. Nonetheless, once received by the state agency, these applications are screened for accuracy. If customers were allowed to self-certify, it is highly likely that many certifications would be incorrect due to customers misunderstanding relevant program requirements or through willful dishonesty (e.g., failing to disclose assets, all sources of income, and/or documenting all household members). Therefore, the department opposes this provision.

Thank you for your consideration of the department’s comments on these bills.