

In the Matter of a Working Case for
Commission Review and Consideration of
Utility Assistance Programs and Special
Alternative Residential Customer Rates.

File No. OW-2026-0085

Content: Response to Order Requesting
Comments and Scheduling Workshop

Date of Submission: 5/11/2026



Name of Agency: Missouri Valley Community Action Agency

Mission Statement of agency: To engage communities and coordinate resources to improve the lives of those experiencing poverty.

Vision Statement of Agency: A future in which all people have the opportunity to thrive

Organization: Missouri Valley Community Action Agency
Name: Cortney Jolliff-Mullins
Title: Outreach Services Director
Date of Submission:
Provider? <input checked="" type="checkbox"/> Please complete both Part A and Part B
Stakeholder only? <input type="checkbox"/> Please complete only Part B
Programs Administered/Managed by your Organization (ALL utility related programs, including government funded programs such as LIHEAP and weatherization)
<ol style="list-style-type: none"> 1. LIHEAP 2. Weatherization 3.

Part A: Provider Information Request

If you or your organization helps or has previously helped administer a utility assistance program (weatherization, LIHEAP, PAYS, Keeping Current, Dollar Help, Dollar More, ERPP, Critical Needs, Low-Income Assistance Programs, Payment Partner Program, etc.) please provide your name and the name of your organization and complete Part A. If you do not manage or administer programs, skip to Part B on page 2.

Please complete a table for each program that your organization manages;
 Copy and paste the tables as needed for the number of programs your organization manages;
 Cells will expand as needed to accommodate text;
 Provide information on the time and duration of administering program. (for example; Weatherization - February 7 632)

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		LIHEAP			
Program Start Date		Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	4,100	Monthly Average Enrollment #			
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS		
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.		

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Strengths within the LIHEAP program:
Helps prevent energy crisis.
<ul style="list-style-type: none"> • LIHEAP provides direct assistance for heating and cooling costs, reducing utility disconnections and helping families maintain safe living conditions.
Supports vulnerable populations.

- The program prioritizes older adults, people with disabilities, families with young children, and households with very low income.

Stabilizes households.

- Energy assistance often frees up income for food, medication, rent, transportation, and childcare. One utility bill can keep an entire household budget from collapsing.

Weatherization connections

- LIHEAP can coordinate with energy-efficiency and weatherization programs, helping reduce long-term utility burdens instead of only addressing immediate bills.

Broad bipartisan support

- Because home energy access is considered a basic necessity, LIHEAP has historically maintained support across political lines.

Crisis intervention capability

- Emergency energy assistance can prevent shutoffs, restore service, or provide temporary relief during extreme weather events or disasters.

Based on experience and participant feedback, what are the WEAKNESSES of this program?

Administrative Funding Constraints and Operational Burden A significant weakness within the program is the limitation of administrative funding necessary to effectively operate the program. Current administrative allocations are often not sufficient to support the staffing levels required to manage high application volumes, particularly at the beginning of the program year when demand surges sharply.

As a result, agencies are frequently unable to hire and retain enough qualified staff to process applications within required timeframes, resulting in delays, increased caseloads per worker, and reduced capacity for timely customer service. The workload placed on existing staff is substantial and often exceeds reasonable operational capacity during peak periods.

Administrative funding limitations directly impact compensation structures. Agencies are often unable to offer hourly wages that are competitive or reflective of the complexity, workload, and compliance expectations associated with LIHEAP administration. This contributes to staffing shortages, high turnover, and training burdens that further slow program processing and reduce overall efficiency.

Overall, insufficient administrative funding creates a structural bottleneck that affects every stage of program delivery—from intake to eligibility determination to crisis response—ultimately limiting the program’s ability to serve households in a timely and effective manner.

Administrative Burden and Application Volume One of the greatest administrative challenges within LIHEAP is the overwhelming volume of applications submitted at the beginning of the program year. Because so many applications are received within a very short timeframe, agencies often struggle to meet the required 30-day processing timeline. This creates delays for vulnerable households and places significant strain on program staff. Program guidelines could be improved by implementing staggered submission criteria, such as processing applications by last name, date of birth, or aligning renewals with other benefit recertifications such as SNAP/Food Stamp renewals. This would help distribute workload more evenly throughout the year and improve processing efficiency.

Income Verification Requirements Another weakness is the requirement for additional proof of income when applicants receive Social Security benefits. Currently, federal Social Security award letters are often not accepted as sufficient verification, creating unnecessary burdens for

both applicants and program administrators. Many applicants are unbanked and receive benefits through prepaid debit card services such as Direct Express or Chime. Obtaining printed transaction histories or account documentation from these providers can be difficult, time-consuming, and confusing for elderly or disabled households. Accepting Social Security award letters again as primary income verification would streamline processing and reduce barriers for vulnerable populations.

Crisis Definition Challenges The current crisis definition also creates operational challenges. Many households wait until the final day before disconnection to submit their utility disconnect notice, resulting in a surge of emergency applications that overwhelms LIHEAP processing staff. This reactive pattern can delay assistance for households that acted responsibly by applying early and submitting documentation in a timely manner. The system unintentionally rewards last-minute applications while increasing staff workload and limiting the agency's ability to efficiently prioritize true emergencies.

Insufficient Funding and Rising Utility Costs Federal and state allocations rarely meet the growing demand for energy assistance, particularly with the increasing number of utility rate cases being approved. Rising utility costs, combined with the poor condition and energy inefficiency of much of Missouri's aging housing stock, are creating significant financial stress for low-income households. Many families experience extremely high monthly utility bills that are difficult to manage, even for households above the federal poverty level. Even when households qualify, benefits may not fully cover rising utility costs, especially during periods of inflation or extreme temperatures. As a result, LIHEAP benefits often provide only partial relief and may not fully stabilize household energy burdens.

Seasonal and Reactive Program Structure Assistance is frequently concentrated around winter heating seasons, while cooling needs and year-round energy affordability challenges often receive less support. In many cases, applicants do not fully utilize their Winter ECIP benefits, yet the available Summer ECIP benefit amount is often insufficient to cover the significantly higher cooling costs experienced during extreme summer temperatures. This imbalance can leave households struggling to maintain safe living conditions during the summer months, particularly for elderly individuals, households with medical needs, and families living in older, energy-inefficient homes. Greater flexibility in benefit allocation between winter and summer assistance periods could help address actual household energy burdens more effectively throughout the year.

Complex Application Processes Applicants often face burdensome documentation requirements and lengthy application processes when applying for LIHEAP. A significant number of applicants fail to submit all required documentation, or in some cases submit none at all, preventing the application from being processed timely. This creates an administrative burden for LIHEAP staff, who must repeatedly revisit incomplete applications, request missing information, and delay processing of other pending applications. Repeated "touch points" on incomplete files reduce overall program efficiency and contribute to longer processing times for all households. Implementing an application system that prevents submission until all required

documentation is uploaded or attached would help streamline processing, reduce administrative workload, and improve turnaround times for both applicants and program staff.

Delayed Processing Times Staff shortages, paper-heavy systems, and high application volume can significantly slow approval timeframes, particularly during peak enrollment seasons. Program changes implemented at the state level during the middle of the fiscal year create additional confusion and administrative burden. Mid-year policy updates and added requirements often require staff retraining, procedural adjustments, and additional applicant follow-up, all of which contribute to delays in processing.

The current structure of the program in Missouri further compounds these challenges. Large surges of applications at the beginning of the program year, incomplete applications, refusal to accept Social Security award letters as verification, and ongoing policy changes create an already complex processing environment. In addition, it seems that state-level staff may not fully understand the day-to-day complexity and workload associated with processing LIHEAP applications at the local level. Together, these factors increase processing times, create inefficiencies, and place significant strain on frontline staff attempting to meet processing requirements while serving vulnerable households.

Recertification Burden Households often must repeatedly provide the same documentation each year when applying for LIHEAP, creating frustration for both applicants and program staff. This is particularly burdensome for elderly and disabled households whose income and household circumstances rarely change significantly from year to year. As previously suggested, it would be beneficial to allow elderly and disabled applicants to recertify every two to three years instead of annually. In most cases, these households remain categorically eligible and experience little change in income or household composition that would affect eligibility. Implementing biannual or triannual recertification for fixed-income households would help reduce administrative workload, ease application processing burdens, and allow staff to focus more time on households with changing eligibility circumstances. It would also reduce stress and confusion for elderly and disabled applicants who already face barriers related to transportation, technology access, mobility, and navigating complex documentation requirements.

If you have it, please provide empirical and/or anecdotal data that supports your comments.

Part B: Stakeholder Information Request

All interested stakeholders are invited to submit responses to any or all of the following questions. To ensure submissions are as helpful as possible, respondents are encouraged to provide specific information and data relevant to circumstances experienced in Missouri, "lessons learned" from other jurisdictions, and citations.

Stakeholder Question 1: EFFECTIVENESS OF EXISTING PROGRAMS AT REDUCING ARREARAGES AND DISCONNECTIONS FOR HIGH-BURDEN HOUSEHOLDS	
a. How much do existing programs help improve long-term household stability versus one-time crisis relief (i.e. reduce repeat disconnects)?	Existing programs are effective for short-term relief but have limited impact on long-term stability. They help prevent immediate disconnections and reduce arrearages; however, because assistance is typically one-time or seasonal, many high-burden households experience recurring arrears and repeat disconnections.
b. Which specific features are most effective at stabilizing households and preventing repeated cycles of arrearage (e.g., predictable monthly payments, income-based caps, arrearage forgiveness, and hardship protections, etc.)?	The most effective features are those that make utility costs predictable and income aligned. Programs like level monthly billing and arrearage forgiveness tied to consistent payments are the strongest at preventing repeat cycles. When combined with flexible payment options and shutoff protections, these approaches stabilize households by addressing both current affordability and past debt. Without this combination, most interventions function as short-term relief and do not prevent recurring arrearages.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	The most underserved or partially excluded households are often those households with irregular or seasonal income, families slightly above income guidelines but still struggling with high utility costs, renters whose utilities are not in their name, and unbanked households that face barriers with documentation and payment systems. Seniors and individuals with disabilities, particularly in rural areas, also face increased challenges due to higher energy usage and limited transportation or internet access. In addition, households with limited English proficiency or low program literacy may not fully access available services because of communication and outreach barriers.
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	Program effectiveness is limited by structural and administrative constraints. Limited funding and benefit caps often provide only partial rather than sustained relief. Most programs are designed as crisis interventions, which address emergencies but not recurring affordability issues. Administrative and documentation requirements can also delay or discourage participation, especially during urgent situations. In rural areas, transportation, broadband, and outreach gaps further reduce access. These factors make programs effective for short-term crisis response but less effective at long-term stabilization and preventing repeat arrearages.
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	Gaps could be addressed by shifting from crisis-based aid to continuous affordability. Options include income-based payment caps, automatic enrollment for households already in programs like SNAP or Medicaid, and structured arrearage forgiveness tied to consistent payments. Stronger coordination with utilities on standardized payment plans and year-round protections would further improve consistency.

Stakeholder Question 2: CRITERIA AND MECHANISMS FOR PROGRAM ENROLLMENT	
a. What principles should be used to establish eligibility criteria (e.g., need, administrative feasibility, accuracy, and alignment with household need) and how should programs prioritize access to assistance when resources are limited?	

<p>Programs should consider factors beyond income alone, including energy burden, arrearage status, shutoff risk, medical needs, and income instability, to better reflect actual household hardship. When resources are limited, priority should be given to households at highest risk of disconnection or harm, including seniors, individuals with medical needs, and households with repeated arrearages.</p>
<p>b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?</p>
<p>Program eligibility should be based on a combination of household income, energy burden, and vulnerability factors rather than income alone. Key vulnerability indicators should include active shutoff notices, repeated arrearages, medical needs requiring utility-dependent equipment, seniors, individuals with disabilities, households with young children, and households experiencing income instability or unemployment. Energy burden metrics should evaluate the percentage of household income spent on utilities, with households paying excessive amounts of income toward energy costs considered high burden and at greater risk for disconnection.</p>
<p>c. Would automatic or categorical enrollment be effective?</p>
<p>Yes. It would reduce administrative barriers, improve participation among eligible households, and speed delivery of assistance during crises. Automatically enrolling households already participating in programs such as SNAP, Medicaid, TANF, or SSI would simplify verification, reduce paperwork, and help reach vulnerable households that may struggle with applications, transportation, internet access, or documentation requirements. It would also improve continuity of assistance and reduce the likelihood that eligible households experience preventable disconnections due to delays or failure to apply.</p>
<p>d. What risk-management practices (e.g., random audits, post-enrollment verification, data-matching) should be used that are effective without creating undue burdens for applicants?</p>
<p>Effective risk management should rely on data-matching and automation first, using existing eligibility systems like SNAP, Medicaid, and unemployment data to confirm qualifications with minimal applicant burden.</p>
<p>e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?</p>

<p align="center">Stakeholder Question 3: CHALLENGES OF ADMINISTRATIVE BURDEN</p>
<p>a. What administrative practices would reduce customer burden and streamline application, verification, and recertification processes (e.g., short-form applications, online portals, single-point-of-entry systems)?</p>
<p>Certification periods with simplified recertification (only updating changes rather than reapplying fully), especially for the elderly and disabled, could reduce repeated administrative burden for both households and staff. An online portal where all required documents are required to be submitted with application would streamline the entire application process.</p>
<p>b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?</p>
<p>Allowing applicants to reapply every 2–3 years would significantly reduce administrative burden by decreasing application volume at the start of each program year, especially for those elderly and disabled. This would allow staff to focus more time on applications that require detailed review or additional verification.</p>
<p>c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?</p>

Stakeholder Question 4: METRICS AND EVALUATION	
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?	
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?	
c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?	
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?	
e. What metrics should be used to assess whether programs improve long-term household stability, reduce arrearages, prevent disconnections, and support energy-efficiency or weatherization investments?	

Stakeholder Question 5: RATE STRUCTURES AND ASSISTANCE SUCCESS	
a. Is there a relationship between utility rate structures and the success of assistance programs? If so, what is that relationship?	<p>Yes. Utility rate structures directly affect the success of assistance programs because they determine how affordable bills are before assistance is applied.</p> <p>Rate structures with large seasonal spikes, high fixed charges, or steep penalties for late payment can increase arrearages and reduce the long-term impact of assistance.</p> <p>On the other hand, more predictable and income-driven rate programs, such as level billing or income driven approaches, help households maintain consistent payments and reduce repeat disconnections. Assistance programs are more effective when utility rates are stable, predictable, and aligned with household ability to pay.</p>
B31. How does the rate design element of fixed charges affect households with limited or no income flexibility?	<p>High fixed charges can be especially difficult for households with little or no income flexibility because the charges must be paid no matter how much energy is used. Even if a family tries to lower usage to save money, the fixed portion of the bill stays the same.</p> <p>This makes it harder for low-income households to manage bills during financial hardship, increases the risk of past-due balances and disconnections, and limits the benefit of energy-saving efforts.</p>
b2. How does the rate design element of seasonal usage and rates affect households with limited or no income flexibility?	<p>Seasonal usage and rate increases can create sudden spikes in utility bills during extreme weather months, especially in summer and winter. For households with limited or fixed incomes, these higher bills are often difficult to absorb because their income does not increase along with utility costs.</p> <p>This can lead to missed payments, growing arrearages, and a higher risk of disconnection, even for households that are otherwise able to stay current during lower-cost months.</p>
b3. How does the rate design element of time-variant pricing affect households with limited or no income flexibility?	<p>Time-variant pricing can be difficult for households with little income flexibility because electricity costs more during certain times of the day, usually during peak usage hours. Many low-income households cannot easily shift when they use electricity due to work schedules, childcare, medical needs, or being home during the day. As a result, they may face higher utility bills and less control over costs, increasing the risk of past-due balances and disconnections.</p>

Stakeholder Question 6: EFFECTIVENESS AND REDUCING RELIANCE ON CRISIS ASSISTANCE

Identify specific program elements that have demonstrated the greatest success in reducing reliance on “in crisis” assistance. (e.g., offering 1/12th debt forgiveness in exchange for on-time payments, offering levelized billing)

Programs work best at reducing “in-crisis” assistance when they make bills steady, affordable, and easier to keep current.

The most effective tools are levelized billing (spreading costs evenly across the year), income-based payment plans, and debt forgiveness for making on-time payments over time. These help prevent bills from building up in the first place.

Other helpful approaches include automatic enrollment in assistance programs, early payment plans before shutoff happens, and energy efficiency upgrades that lower overall usage. Together, these reduce emergencies and keep households from repeatedly falling into crisis.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

Describe the implementation challenges that should be anticipated when launching new assistance programs.

Getting the applicants to understand the programs and getting them access to the program. A lot of elderly program participants will not let their bill go into disconnect status to receive a shut off notice. This hinders the success of the program which would allow the elderly to utilize the emergency component of the program and allow them additional funds to expend on other essential bills and necessities.