

ATTACHMENT 1
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

HHS is requiring further detail from States on their FY2011 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that States highlight and describe all elements of this FY2011 plan which represent improvements or changes to the State's FY2010 plan for preventing and detecting fraud, abuse and improper payment prevention.

State, Tribe or Territory (and grant official): **CHIPPEWA CREE TRIBE** Date/Fiscal Year:

1. -RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2010 or the prior three years, in annual audits, State monitoring assessments, Inspector General reviews, or other Government Agency reviews of LIHEAP agency finances.	Please describe whether the cited audit findings or relevant operations have been resolved or corrected. If not, please describe the plan and timeline for doing so in FY2011.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
Audit findings fund 3 clients over income of the 543 households served during FY/09.	The audit findings were resolved. 3 clients allocation were paid back by non-federal funds. The Director and staff met with the auditor to develop a system to avoid this from happening again. The	If there is no plan in place, please explain why not.	The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.

	<p>auditor suggested income be received from the payroll department if the client is using wages, Sub-contractors will use last Tax Filing Information. The staff implemented a peer review process the last hour of each work day to review those applications received that particular day, to ensure application is complete with verified income.</p>		
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2. - COMPLIANCE MONITORING

<p>Describe the State's FY2010 strategies that will continue in FY2011 for monitoring compliance with State and Federal LIHEAP policies and procedures by the State and local administering agencies.</p>	<p>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY2011.</p>	<p>If you don't have a firm compliance monitoring system in place for FY11, please describe how the State is verifying that LIHEAP policy and procedures are being followed.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The Chippewa Cree Tribe has an internal Auditor on site to monitor compliance system for LIHEAP</p>	<p>Due to the three findings, peer review and Monitoring by the Internal Auditor will ensure all clients are eligible for service.</p>	<p>If you don't have a firm compliance monitoring system in place for FY11, please describe how the State is verifying that LIHEAP policy and procedures are being followed.</p>	<p><i>A sound methodology with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

3. - FRAUD REPORTING MECHANISMS

<p>For FY2010 activities continuing in FY2011, please describe all (a) mechanisms available to the public for reporting cases of suspected LHEAP fraud, waste or abuse? [These may include telephone hotlines, websites, email addresses, etc.] (b) strategies for advertising these resources.</p>	<p>Please highlight any tools or mechanisms from your plan which will be newly implemented in FY2011, and the timeline for that implementation.</p>	<p>If you don't have any tools or mechanisms available to the public to prevent fraud or improper payments, please describe your plan for involving all citizens and stakeholders involved with your program in detecting fraud.</p>	<p>Necessary outcomes of these strategies and systems.</p>
<p>A telephone call will be accepted without the person reporting having to identify themselves. All calls will be investigated</p>	<p>The Tool available will be the telephone call or the public can report the issue in writing without using his/her name. At this time, I do not believe the Tribe as a specific policy addressing this issue. The Director's are mandated to attend all regular Tribal Business Committee Meetings, and I will request a policy established by the Tribe and as soon as the Policy is written and approved, I will forward the policy to your office. In the Meantime, notices are displayed for anyone wanting to report fraud, can either our telephone number or the number of the Criminal Investigator at Law Enforcement. The caller can remain anonymous and all calls will be forwarded to the</p>	<p>If you don't have any tools or mechanisms available to the public to prevent fraud or improper payments, please describe your plan for involving all citizens and stakeholders involved with your program in detecting fraud.</p>	<p><i>Clear lines of communication for citizens, grantees, clients, and employees to use in pointing out potential cases of fraud or improper payments to State administrators.</i></p>

C.I. Until the policy is written and approved, Telephone numbers for the LHEAP Office and Law Enforcement will be listed on the Posters.

4. - VERIFYING APPLICANT IDENTITIES

<p>Describe all FY2010 State policies continuing in FY2011 for how identities of applicants and household members are verified.</p>	<p>Please highlight any policy or strategy from your plan which will be newly implemented in FY2011.</p>	<p>If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The head of household must show a picture ID and a legal document with SSN for head of household and residents of household.</p>	<p>This has been a requirement for several years and has served the program well</p>	<p>If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.</p>	<p>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</p>

5. - SOCIAL SECURITY NUMBER REQUESTS

<p>Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</p>	<p>Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same.</p>	<p>If the State is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All members of the family must provide an accurate SSN document. SSN# are provided on Mt State Drivers license, Tribal Enrollment ID or Certificate and the IHS Facilities Certifies SSN# also. With the new Data Base, we will now use that system.</p>	<p>This has been a part of the plan for a number of years and continues.</p>	<p>If the State is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.</p>	<p>All valid household members are reported for correct benefit determination</p>

Attachment – page 2

6. - CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

<p>Describe if and how the State used existing government systems and databases to verify applicant or household member identities in FY2010 and continuing in FY2011. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)</p>	<p>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY2011.</p>	<p>If the State won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the State will supplement this fraud prevention strategy.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>During FY/10 the SSN numbers were not verified, as the program was unaware of a system in place.</p>	<p>Having access to a data base where this information can now be verified. It will be implemented at the onset of FY/11. The Liheap Policy & Procedure's now include Using the database to verify all</p>		<p>Use of all available database systems to make sound eligibility determination.</p>

SSN# for all household members listed. This policy is effective for FY/11.

7. - VERIFYING APPLICANT INCOME

Describe how the State or designee used State Directories of new hires or similar systems to confirm income eligibility in FY2010 and continuing in FY2011.

Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY2011.

If the State won't be using new hire directories to verify applicant and household member incomes how will the State be verifying the that information?

Necessary outcomes from these systems and strategies

As a result of the 3 audit findings we will no longer accept check stubs or any other document other than a payroll record from the employer or the last IRS Tax Filing for sub-contactors. Verified Payroll income must be in the form of a Payroll Statement from the Employer. For Household members 18 years of age and over, they must provide a statement from General assistance regarding any payment they have received during the last 12 months. Other members 18 and over must name specific jobs they have had within the last 12 months. This information can be easily verified by Employers.

Due to the peer review structure of our dept, any application that does not provide all sources of income and new hires will be held ineligible pending the proper documentation.

If the State won't be using new hire directories to verify applicant and household member incomes how will the State be verifying the that information?

Effective income determination achieved through coordination across program lines.

8. - PRIVACY-PROTECTION AND CONFIDENTIALITY

<p>Describe the financial and operating controls in place in FY2010 that will continue in FY2011 to protect client information against improper use or disclosure.</p>	<p>Please highlight any controls or strategies from your plan which will be newly implemented as of FY2011.</p>	<p>If you don't have relevant physical or operational controls in place to ensure the security and confidentiality of private information disclosed by applicants, please explain why.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All client files are kept in a locked cabinet in a locked storage room outside of the public area. Files are not to be left out in the open at any time during the workday.</p>	<p>This policy has been in effect for several years without and privacy issues rising</p>	<p>If you don't have relevant physical or operational controls in place to ensure the security and confidentiality of private information disclosed by applicants, please explain why.</p>	<p>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</p>

9. - LIHEAP BENEFITS POLICY

<p>Describe FY2010 State policies continuing in FY2011 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.</p>	<p>Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY2011.</p>	<p>If the State doesn't have policy in place to protect against improper payments when making payments or providing benefits on behalf of clients, what supplementary steps is the State taking to ensure program integrity.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The vendors are provided purchase orders and upon receipt of the pour, a payment is made. With regard to the two electric providers, a statement must be presented which includes the client's name and acct number. If for some reason the payment is not applied to the electric provider. We are notified and the payment is returned. Due to the fact that we are serving more homes then listed on 2000 census, our payment Metrix Plan is not very complex. Example, a family with income less then 10,000.00 residing in a 3 bedroom home will receive the highest amount for that category of 700.00. a family of five, with an income of 35,001. living in a 3 bedroom home will receive 400.00. hopefully with the 2010 census, the household count for our Reservation will be correct.</p>	<p>We have use only four vendors, two rural electric And two propane dealers. We have never encountered a problem with a vendor that and all vendor payments not applied are returned to the Liheap program</p>	<p>If the State doesn't have policy in place to protect against improper payments when making payments or providing benefits on behalf of clients, what supplementary steps is the State taking to ensure program integrity.</p>	<p>Authorized energy vendors are receiving payments on behalf of LIHEAP-eligible clients</p>

10. - PROCEDURES FOR UNREGULATED ENERGY VENDORS

<p>Describe the State's FY2010 procedures continuing in FY2011 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.</p>	<p>Please highlight any strategies policy in this area which will be newly implemented in FY2011.</p>	<p>If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the State is ensuring program integrity.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The LIHEAP Program does not provide wood as no one in our area uses wood as his or her sole source of heat. We provide service to only two types of vendors, propane and electricity. Years ago we did provide wood, but it was difficult to monitor and the practice was eliminated 10 to 15 years ago.</p> <p>Propane dealers must list the percentage registered on the tank prior to and after the pour. The receipt will indicate the number of gallons received the number of gallons poured must be consistent with the percentage after pour. 100 gallons equal 20% the date of the poured is listed.</p> <p>Electric payments are made based on the statement provided by client, and the vendors are extremely trust worthy and we have never had a problem.</p>		<p>If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the State is ensuring program integrity.</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>

11. - VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

<p>Describe State FY2010 policies continuing in FY2011 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of the State's procedure for averting fraud.</p>	<p>Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY2011.</p>	<p>If you don't have a system in place for verifying vendor authenticity, please describe how the State can ensure that funds are being distributed through valid intermediaries?</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>We have used the same vendors for 1 to 15 years. We are absolutely assured the vendor is rendering the service and is receiving the entitled amount based on receipts</p>		<p>If you don't have a system in place for verifying vendor authenticity, please describe how the State can ensure that funds are being distributed through valid intermediaries?</p>	<p>An effective process that effectively confirms the existence of entities receiving federal funds.</p>

12. - TRAINING AND TECHNICAL ASSISTANCE

<p>In regards to fraud prevention, please describe elements of your FY2010 plan continuing in FY2011 for training and providing technical assistance to (a) employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors</p>	<p>Please highlight specific elements of your training regimen and technical assistance resources from your plan which will represent newly implemented in FY2011.</p>	<p>If you don't have a system in place for anti-fraud training or technical assistance for employees, clients or energy vendors, please describe your strategy for ensuring all employees understand what is expected of them and what tactics they are permitted to employ.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>There is no specific clause in the plan that refers to staff training or training of vendors. Staff review the program components annually and discuss methods to improve the service provided to the client in a more efficient manner, if a problem presents itself during the course of the year, it is discussed by all relevant staff and a solution to the problem is found. Vendors are aware of policies regarding service to LIHEAP clients, and the vendor agreement assures this method. Non-governmental staff are not involved with the LIheap program and/or the eligibility process.</p>		<p>When a new employee is hired, the Director and/or any other personnel that have worked with LIHEAP clients train him or her. Upon the distribution and processing of a clients application, staff trains the new employee until such time as the staff is comfortable that the new hire can perform these duties correctly. In the event of a mistake, the afternoon peer review is designed to make sure the application is complete, All relevant documents are in the file, the income is correct and has been verified. The staff consists of 2 full time positions who have been employed in this department for 10 years. Being a small community, it is</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

		<p>not uncommon to know families and their members, if they are employed Diror have boyfriends living with them, we have been able to monitor households, but as the community has grown, in speaking to the Tribe's Chief of Staff and under the new initiatives, during the beginning of FY/11, we will have training as soon as the Chief of staff can set a date for the training. And it will be mandatory for all relevant staff to attend.</p>	
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13. - AUDITS OF LOCAL ADMINISTERING AGENCIES

<p>Please describe the annual audit requirements in place for local administering agencies in FY2010 that will continue into FY 2011.</p>	<p>Please describe new policies or strategies to be implemented in FY2011.</p>	<p>If you don't have specific audit requirements for local administering agencies, please explain how the Grantee will ensure that LHAP funds are properly audited under the Single Audit Act requirements.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The Chippewa Cree Tribe has a Budget Ordinance, which requires all programs to be audited annually. The Tribe requires strict adherence to the Ordinance. Audits are for the previous year and Program Directors have the responsibility to have all documents ready and available. The Ordinance requires Directors</p>	<p>The Budget Ordinance remains in place</p>		<p><i>Reduce improper payments, maintain local agency integrity and benefits awarded to eligible households</i></p>

to meet with finance officers
monthly and quarterly budget
meetings with the Business
Committee of the Chippewa Cree
Tribe.
The Tribe has an Internal Auditor
on site.

Additional Information
ATTACHMENT TO FY/11 LIHEAP PLAN Chippewa-Cree Tribal Vendor Agreement

CHIPPEWA CREE TRIBAL VENDOR AGREEMENT:

**IN CONSIDERATION OF RECEIPT OF PAYMENT FROM THE CHIPPEWA CREE TRIBAL LIHEAP PROGRAM AND
ON BEHALF OF HOUSEHOLDS ELIGIBLE FOR ASSISTANCE UNDER THE LOW INCOME HOME ENERGY
ASSISTANCE PROGRAM. TITLE III OF PUBLIC LAW 96-223**

NAME OF HOME ENERGY SUPPLIER: _____

AGREES TO THE FOLLOWING:

- (A) TO CHARGE THE ELIGIBLE HOUSEHOLD IN THE NORMAL BILLING PROCESS.
- (B) TO CHARGE NO MORE THAN THE REGULAR PRICE WHICH THE NON-LIHEAP CONSUMER WOULD BE CHARGED
- (C) NOT DISCRIMINATE AGAINST THE ELIGIBLE HOUSEHOLD AS A RESULT OF OFFERING DEFERRED PAYMENT PLANS OR IN OTHER CONDITIONS OF SALE, CREDIT, DELIVERY OR PRICE.
- (D) THE VENDOR ASSURES THAT NO HOUSEHOLD RECEIVING ASSISTANCE UNDER THIS TITLE WILL BE TREATED ADVERSELY BECAUSE OF SUCH ASSISTANCE UNDER APPLICABLE PROVISIONS OF STATE LAW OR PUBLIC REGULATORY REQUIREMENTS.

THIS AGREEMENT SHALL BE IN EFFECT FROM _____ 20__ UNTIL _____ 20__

NAME OF VENDOR: _____

ADDRESS OF VENDOR: _____

SIGNATURE OF VENDOR: _____

SIGNATURE OF TRIBAL OFFICIAL: _____

DATE: _____