

PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT -ATTACHMENT
 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):	Citizen Potawatomi Nation	Date/Fiscal Year: FY2011
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.
Please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents <i>In the annual audit conducted in accordance with the Single Audit Act - None Found – CPN has received the GAO award for excellence in accounting for the past 25 years.</i>	N/A	N/A
		The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.

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>CPN LIHEAP applications are reviewed by the Social Services Coordinator and then verified by the Director before payment is approved. Applicants must provide documentation of all income sources, social security numbers, proof of residence (utility bill), and when applicable a quote from the vendor (propane services). Area LIHEAP agencies are contacted by fax to verify if assistance has been rendered at another agency to avoid duplication of service. If determined no assistance has been rendered payment is processed. If determined assistance has been received from another entity assistance is denied.</p>	<p>Newly Added: Require Social Security verification on each of the applicant household members (not just applicant).</p>	<p>N/A</p>	
<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			<p><i>A sound methodology, with a schedule for regular monitoring and a</i></p>

			<p><i>more effective monitoring tool to gather information.</i></p>
<p>FRAUD REPORTING MECHANISMS</p>			
<p>For FY2010 activities continuing in FY2011, please describe all (a) mechanisms available to the public for reporting cases of suspected LIHEAP fraud, waste or abuse? [These may include telephone hotlines, websites, email addresses, etc.] (b) strategies for advertising these resources.</p> <p>This information is provided to applicants as part of the LIHEAP application.</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>All FY2011 applications will include information on reporting suspected fraud. This information will be posted at the LIHEAP application site.</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>Public will be provided a means to report suspected fraud and/or abuse.</p>
<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			<p><i>Clear lines of communication for citizens, grantees, clients, and employees to use in pointing out potential cases of fraud or</i></p>

			<p><i>improper payments to State administrators.</i></p>
<p>VERIFYING APPLICANT IDENTITIES</p>			
<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>All applicants are required to provide original documents. Copies are made as supporting documentation for each application. This includes personal identification such as Driver's License or other photo identification, social security card, utility bill, vendor quote (when applicable such as Propane Services), all income sources. If an adult member of the household lacks verifiable income, applicant must complete a statement of income with the signature notarized as well as provide a statement from the person who provided financial support during the period of no income. For additional assistance, elders and minors 5 and under must provide documentation of age. Crisis</p>	<p>New for 2011 -Adding verification of household members social security numbers.</p>	<p>State systems for verification are not available to CPN at this time. We require applicants to submit original documents and copy those for the file.</p>	

<p>situations require appropriate documentation. Verification of disability is also required. Documentation of membership in a federally recognized tribe is also required. Require original documents be presented.</p>			<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>
<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			
<p>SOCIAL SECURITY NUMBER REQUESTS</p>			
<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>Social Security Cards are required and copied. Documents are stored in secure file cabinet and area. Social Services Counselor and Director / Ass't Director have access to the current files. Previous year files are stored in a separate area.</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>Required for All household members.</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>N/A</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>please provide full descriptions of the State's plans and strategy in this area,</i></p>			<p><i>All valid household</i></p>

and attach/reference excerpts from relevant policy documents

members are reported for correct benefit determination.

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

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.)

Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY2011.

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.

Necessary outcomes from these systems and strategies

CPN does not have access to this information at this time. Verification with area entities does not currently include social Security numbers due to lack of MOU's with regards to confidentiality.

If made available to tribal grantees, CPN would participate if not cost prohibitive.

NONE

please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents

Use of all available database systems to make sound eligibility determination.

VERIFYING APPLICANT INCOME

Describe how the State or designee used State Directories of new hires or similar

Please highlight any policies or strategies for

If the State won't be using new hire

Necessary outcomes from

<p>systems to confirm income eligibility in FY2010 and continuing in FY2011. The OESC system is not accessible to Tribal Grantees. Attempts were made several years ago to negotiate access to the OESC system as required by DOL-WIA grant. The state advised that for an unknown fee to develop software – they would consider making this system available. It was determined that this was cost prohibitive. Additionally, it was determined that the information has a significant lag time and was not as accurate as our current procedure.</p>	<p>using new hire directories which will be newly implemented in FY2011. NOT applicable / Not available to Tribal Grantees at this time.</p>	<p>directories to verify applicant and household member incomes how will the State be verifying the that information? All applicants are required to provide documentation of income such as pay stubs, social security benefits notices, DHS-Food stamp benefits, child support payment history, etc.</p>	<p>these systems and strategies</p> <p><i>Effective income determination achieved through coordination across program lines.</i></p>
<p>PRIVACY-PROTECTION AND CONFIDENTIALITY</p>			
<p>Describe the financial and operating controls in place in FY2010 that will continue in FY2011 to protect client</p>	<p>Please highlight any controls or strategies from your plan which will</p>	<p>If you don't have relevant physical or operational controls</p>	<p>Necessary outcomes from these systems</p>

<p>information against improper use or disclosure.</p> <p>Documents are stored in secure location. Staff is trained to maintain confidentiality of information. Records management requires any files that are marked for destruction are either burned or shredded.</p>	<p>be newly implemented as of FY2011.</p> <p>Review access to file storage. Install locks on storage room as appropriate.</p>	<p>in place to ensure the security and confidentiality of private information disclosed by applicants, please explain why.</p> <p>N/A</p>	<p>and strategies</p>
<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>
<p>LIHEAP BENEFITS POLICY</p>			
<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>All payments are made directly to the vendor. A bill or estimate of cost is required for payment.</p>	<p>Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY2011.</p> <p>N/A</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><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>
<p>PROCEDURES FOR UNREGULATED ENERGY VENDORS</p>			
<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>Payment is made directly to the vendor. An actual bill or estimate is required. LIHEAP households are notified of assistance rendered on their account. Failure to receive a credit on their account is monitored by the individual LIHEAP household. In cases of discrepancies the household notifies CPN of the problem.</p>	<p>Please highlight any strategies policy in this area which will be newly implemented in FY2011.</p> <p>N/A</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><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			<p><i>Participating vendors are thoroughly researched and inspected before benefits are</i></p>

issued.

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>Assistance is only rendered thru verifiable vendors. Most of the vendors are gas, electric, or propane and have not changed in recent years. WE deal with the same utility companies each year. They are listed in the phone book and newspaper as vendors. Rarely, but on occasion we have purchased wood – we verify with local ads that the price is fair market. Propane vendors have not changed in the past 10 years. The last 'new' vendor added for propane was verified by visiting their business, checking with advertisements, and asking for tax exempt ID number. Additionally, the Tribe Accounting department requires any new vendor provide appropriate tax Id numbers.</p>	<p>None</p>		
<p><i>Please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from</i></p>			
			<p><i>An effective process that effectively</i></p>

relevant policy documents

confirms the existence of entities receiving federal funds.

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 regiment 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>Staff is trained to alert management regarding potential fraud or abuse directly. All suspected fraud or abuse is investigated and reported to appropriate law enforcement officials – CPN prosecutor and tribal police detective. Steps are taken to recapture any illegal payment. Individuals found to be fraudulent are ineligible for program services for 1 full year. Once reported to the tribal court prosecutor and tribal police department, any action taken is at their discretion.</p>	<p>Not applicable.</p>		
<p><i>please provide full descriptions of the State's plans and strategy in this area,</i></p>			<p><i>The timely and thorough</i></p>

<p><i>and attach/reference excerpts from relevant policy documents</i></p>			<p><i>resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>
<p>AUDITS OF LOCAL ADMINISTERING AGENCIES</p>			
<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 LIHEAP funds are properly audited under the Single Audit Act requirements.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The Citizen Potawatomi Nation is subject to the Single Audit Act and complies accordingly.</p>	<p>Not applicable</p>		<p>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</p>
<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p>			

Additional Information

Please attach further information that describes the Grantee's Program Integrity Policies, including supporting documentation from program manuals, including pages/sections from established LIHEAP policies and procedures.