

**Colville Confederated Tribes  
Low Income Home Energy Assistance Program  
Integrity Assessment**

**Recent Audit Findings**

There have been no audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY 2010 or the prior three years, in annual audits, State monitoring assessments, Inspector General reviews, or other Government Agency reviews of LIHEAP agency finances.

**Compliance Monitoring**

The Colville Confederated Tribes FY 2010 strategies will continue in FY2011 for monitoring compliance with State and Federal LIHEAP policies and procedures by the State and local administering agencies.

*The LIHEAP Manager is responsible for monitoring the program and for providing status reports to the Human Service Department Director. Monitoring will be completed during each critical phase of the program (public participation, outreach, intake, eligibility determination, payments, vendor relationships, and fair hearings). The Human Services Director monitors LIHEAP by conducting monthly meetings, requesting program reports on a quarterly and annual basis. Also, periodic program compliance reviews and Business Council program updates are completed.*

**Fraud Reporting Mechanisms**

The Colville Confederated Tribes does not have any a] mechanism 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.

Currently, it has been an open door policy for the public to report fraud, waste, or abuse to the LIHEAP program manager. Reports from Tribal members to Business Council members are referred to the LIHEAP program manager to investigate.

**Verifying Applicant Identities**

The Colville Confederated Tribes FY 2010 tribal policies will continue in FY 2011 on verifying identities of applicants and household members. The LIHEAP applicant lists names, birthdates, ages, SSA#, Tribal enrollment on household members. Tribal enrollment is verified through the Tribal Enrollment Office.

**Social Security Number Requests**

The Colville Confederated Tribes does require Social Security number of each LIHEAP applicant and/or household member. This will be an on-going requirement.

**Cross-checking social security numbers against government systems/databases**

The Colville Confederated Tribes does not have a database to cross reference, if there is any cross-checking on a Social Security Number or ID of an applicant or household member, we usually contact the local Department of Social Health Services Office and or BIA Social Services Office.

### **Verifying applicant income**

The Colville Confederated Tribes does not use State Directories of new hires or similar systems to confirm income eligibility in FY 2010 and continuing in FY 2011. The Colville Confederated Tribes requires the LIHEAP applicant provide total household income verification and proof of residency before eligibility is determined.

### **Privacy-protection and confidentiality**

The Colville Confederated Tribes has a Privacy – Protection and confidentiality clause on the LIHEAP application that the applicant signs. This will continue in FY2011 to protect client information against improper use or disclosure.

### **LIHEAP Benefits Policy**

The Colville Confederated Tribes FY2010 Tribal policies continuing in FY2011 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients:

LIHEAP is subject to the standard policies and procedures established by the Colville Confederated Tribes. All records are maintained on a computerized system. Program transactions are adequately supported by approved source documents and related materials. The Tribe will continue to vary its benefit payments for a household based on size, income level, and fuel type.

### **Procedures for unregulated Energy Vendors**

The Colville Confederated Tribes FY 2010 procedures for preventing fraud and improper payments when dealing with bulk fuel vendors for heating oil, propane, wood and other unregulated energy vendors will continue in FY 2011.

CCT LIHEAP will enter into contract with energy suppliers assuring the provision of section 2605(B)(7) are met. Household will be advised of these provisions, by an award letter, stating when payments are made to any suppliers on their behalf as well as the amount of payment. CCT LIHEAP will make vendor payments directly to home energy suppliers as their method of payment.

### **Verifying the authenticity of Energy Vendors**

The Colville Confederated Tribes has a vendor registration form that must be completed that requests Name, Address, IRS Tax ID#, Social Security #, etc. to be added in the CCT account system software.

### **Training and Technical Assistance**

The Colville Confederated Tribes will continue to have bi-monthly meetings to train and provide technical assistance to employees involved in the eligibility process of LIHEAP clients and/or energy vendors.

### **Audits of Local Administering Agencies**

The Colville Confederated Tribes complies with the requirement for an annual audit and its standards, issued by the comptroller general of the United States and Office of Management and Budget Circular A-128. Uses the single audit act.