

EASTERN SHAWNEE PROGRAM INTEGRITY PLAN
Low Income Home Energy Assistance Program (LIHEAP)

EASTERN SHAWNEE TRIBE OF OKLAHOMA			FY 2011
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.
There were no audit findings of material weaknesses, reportable conditions, questioned costs, or other findings during the A-133 audit of LIHEAP finances	Not applicable.	Not applicable.	The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.
COMPLIANCE MONITORING			
Describe the Tribe's FY2010 strategies that will continue in FY2011 for monitoring compliance with Tribal and Federal LIHEAP policies and procedures by the Tribe and local administering agencies.	Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY2011	If you don't have a firm compliance monitoring system in place for FY11, please describe how the Tribe is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies.
The program officer reviews expenditures on a monthly basis to ensure that funds are appropriately expended. The tribal accounting office will perform a semi-annual review of client files to ensure eligibility.	The tribal accounting office will perform a semi-annual spot-audit of the LIHEAP program files to verify program procedures are being followed.	Not applicable.	A sound methodology with a schedule for regular monitoring and a more effective monitoring tool to gather information.
FRAUD REPORTING MECHANISMS			
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	Please highlight any tools or mechanisms from your plan which will be newly implemented in FY2011 and the timeline for that implementation.	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	Necessary outcomes of these strategies and systems.

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hotlines, websites, e-mail addresses, etc.] (b) strategies for advertising these resources.		your program in detecting fraud.	
<p>a.) There is a complaint policy in which problems that employees and clients believe may be happening, including alleged cases of fraud, waste, abuse may be reported to the appropriate tribal officials that have oversight responsibilities for the program. If necessary, the officials will refer the situation to the Tribal Police officer in charge of Investigations, who will then follow law enforcement protocols.</p> <p>b.) The procedure is included in the employee handbook and is also available at tribal complexes for the public</p>	Not applicable.	Not applicable.	Clear lines of communication for citizens, grantees, clients, and employees to use in pointing out to Tribal administrators potential cases of fraud or improper payments.

VERIFYING APPLICANT IDENTITIES

Describe all FT2010 Tribal policies continuing in FT2011 for how identities of applicants and household members are verified.	Please highlight any policy or strategy from you plan which will be newly implemented in FY2011.	If you don't have a system in place for verifying applicant's identities, please explain why and how the Tribe is ensuring that only authentic and eligible applicants are receiving	Necessary outcomes of these strategies and systems.
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		benefits.	
The Tribe verifies applicant and spouse identities by either contacting the Tribal Enrollment officer to check the Tribal Enrollment database. If tribal enrollment is not verifiable, the project officer may request to view another form of government issued photo identification	Not applicable.	Not applicable.	Income and energy supplier data that allow program benefits to be provided to eligible individuals.
SOCIAL SECURITY NUMBER REQUESTS			
Describe the Tribe's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.	Please describe whether the Tribe's policy for requiring or not requiring Social Security numbers is new as of FY2011 or remains the same.	If the Tribe is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.	Necessary outcomes of these strategies and systems.
The Tribe requires applicants to provide social security numbers for all household members on the application.	We anticipate changing the current policy slightly for FY2011 to include requesting social security numbers of all household members rather than just the applicant and spouse.	Not applicable.	All valid household members are reported for correct benefit determination.
CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES			
Describe if and how the Tribe 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 Tribe won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the Tribe will supplement this fraud prevention strategy.	Necessary outcomes of these strategies and systems.
The Tribe verifies applicant and spouse identities by either contacting the Tribal Enrollment officer to	Not applicable.	Not applicable.	Use of all available database systems to make sound eligibility determination.

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<p>check the Tribal Enrollment database. If tribal enrollment is not verifiable, the project officer may request to view another form of government issued photo identification.</p>			
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VERIFYING APPLICANT INCOME

<p>Describe how the Tribe or designee used Directories of new hires or similar systems to confirm income eligibility in FY2010 and continuing in FY2011.</p>	<p>Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY2011.</p>	<p>If the Tribe won't be using new hire directories to verify applicant and household member incomes, how will the Tribe be verifying that information?</p>	<p>Necessary outcomes of these strategies and systems.</p>
<p>Applicants are required to submit their prior year 1040 as well as current year income details including wage stubs, check stubs, ledgers, etc. The project officer reviewed the documents that were turned in and made an eligibility determination based on the information provided.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Effective income determination achieved through coordination across program lines.</p>

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 of these strategies and systems.</p>
<p>Client information is stored securely with individuals that determine program eligibility. Financial information is password protected and payment invoices are also stored securely.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</p>

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LIHEAP BENEFITS POLICY			
Describe FY2010 Tribal policies continuing in FY2011 for protecting against fraud when making payments or providing benefits to energy vendors on behalf of clients.	Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY2011.	If the Tribe does not have a policy in place to protect against improper payments when making payments or providing benefits on behalf of clients, what supplementary steps are the Tribe taking to ensure program integrity?	Necessary outcomes of these strategies and systems.
The Tribe required a copy of the most recent energy bill, as well as any other correspondence relating to that particular account and made payment to the utility vendor.	Not applicable.	Not applicable.	Authorized energy vendors are receiving payments on behalf of LIHEAP-eligible clients.

PROCEDURES FOR UNREGULATED ENERGY VENDORS

Describe the Tribe'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 unregulated energy utilities.	Please highlight any strategies in this area which will be newly implemented in FY2011.	If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the Tribe is ensuring program integrity.	Necessary outcomes of these strategies and systems.
If the vendor is not recognizable as a major supplier in this area, the Tribe will make inquiries prior to issuing payment in order to determine that the vendor is reputable using any of the following methods: telephone verification, on-site inspection, internet searches, better business bureau referrals, etc.	Not applicable.	Not applicable.	Participating vendors are thoroughly researched and inspected before benefits are issued.

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

Describe Tribal FY2010 policies continuing in FY2011 for verifying the authenticity of energy vendors being paid under LIHEAP as part of the Tribe's procedure for averting fraud.	Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY2011	If you don't have a system in place for verifying vendor authenticity, please describe how the Tribe can ensure that funds are being distributed through valid intermediaries..	Necessary outcomes of these strategies and systems.
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<p>The majority of energy payments are made to regulated energy utility companies that are widely recognized.</p> <p>In the event that a vendor is not recognizable as a major supplier, the project officer will make inquiries to determine that the vendor is reputable using any of the following methods: telephone verification, on-site inspection, internet searches, better business bureau referrals, etc.</p> <p>Verification of the vendor will take place prior to issuing payment.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>An effective process that effectively confirms the existence of entities receiving federal funds.</p>
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TRAINING AND TECHNICAL ASSISTANCE

<p>Regarding 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 of these strategies and systems.</p>
<p>The tribe provides training and assistance in the following ways:</p> <p>a.) Employees may attend continuing education classes provided that the classes are</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>The timely and thorough resolution of weaknesses of reportable conditions as revealed by the audit.</p>

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<p>necessary, reasonable, within budget, and have proper approval.</p> <p>b.) n/a</p> <p>c.) Clients may request that the project officers assist in completing the necessary application.</p> <p>d.) n/a</p>			
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AUDITS OF LOCAL ADMINISTERING AGENCIES

<p>Please describe the annual audit requirements in place for local administering agencies in FY2010 that will continue into FY2011.</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 of these strategies and systems.</p>
<p>The Tribe is the administering agency, and is subject to an annual A-133 compliance audit.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</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.

Grantee Name: Eastern Shawnee Tribe of Oklahoma Date: 8/30/2010
 Contact Person: Larry Dushane Phone: 918-666-5151

The *LIHEAP Household Report-Short Format* is for use by all direct-grant Indian tribes and tribal organizations. The *LIHEAP Household Report-Short F* also is for use by insular areas with annual LIHEAP allotments of less than \$200,000. This report provides data on LIHEAP assisted households for Fed Fiscal Year (FFY) 2010, the period of October 1, 2009 - September 30, 2010. The Report consists of the Recommended Short Format for Assisted Ho below. As the reported data are aggregated, the information in this report is not considered to be confidential.

Both the Recommended Short Format (the Excel file name is **hhsrptin.xls**) and the instructions on completing the *LIHEAP Household Report-Short For* (the Word file name is **hhrptins.doc**) can be downloaded at the Forms section of the Office of Community Services LIHEAP web site at: http://www.acf.hhs.gov/programs/ocs/liheap/grantees/forms.html#household_report

The spreadsheet is page protected in order to keep the format uniform. The items requiring a response are not page protected. However, other areas o spreadsheet can not be modified.

RECOMMENDED SHORT FORMAT FOR LIHEAP ASSISTED HOUSEHOLDS

REQUIRED DATA

Type of assistance	Number of assisted households
Heating	11
Cooling	1
Winter/year round crisis	9
Summer crisis	
Weatherization	

Note: Include any notes below for (indicate which type of assistance the note is referencing).