ATTACHMENT 1

GILA RIVER INDIAN COMMUNITY PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT

Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

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

State, Tribe or Territory (and grant official): **GILA RIVER INDIAN COMMUNITY**		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.	Necessary outcomes from these systems and strategies

All Audits performed for the last three fiscal years have been annual ones as required by federal regulations.	No relevant findings.	The implementation of our Client Tracking system will provide a thorough resolution of weaknesses or reportable conditions as revealed by the audit.

COMPLIANCE MONITORING

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.	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 State is verifying that LIHEAP policy and procedures are being followed.
		Necessary outcomes from these systems and strategies

The Gila River Indian Community will be monitoring compliance through an internal audit process, and the Single Audit Act performed annually...

Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying and compliance monitoring.		*This methodology will compare data for other Tribal programs for monitoring and is a more effective monitoring tool to gather information.*

Attachment – page 1

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 hotlines, websites, email addresses, etc.] (b) strategies for advertising these resources.	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 your program in detecting fraud.	Necessary outcomes of these strategies and systems
Currently the Gila River Indian Community has a web site and a 1-800 number to report such fraud, waste or abuse. Also, the Community Services Department phone number is also available to receive such calls.	Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying applicant's household information and vendor for utility assistance payments. We will develop notices in the Gila River News and posted at application intake insights.		*Provides clear lines of communication for citizens, grantees, and clients, employees to use in pointing out potential cases of fraud or improper payments to Tribal administrators.*

GILA RIVER INDIAN COMMUNITY LiHEAP PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT

VERIFYING APPLICANT IDENTITIES

Describe all FY2010 State policies continuing in FY2011 for how identities of applicants and household members are verified.	Please highlight any policy or strategy from your 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 State is ensuring that only authentic and eligible applicants are receiving benefits.	Necessary outcomes from these systems and strategies
The Gila River Indian Community and its Community Services Department have program policy on verifying enrollment and data on applicants and household members.	Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying applicant identities with Tribal Enrollment.		*Strategy is based on income and energy supplier data that allow program benefits to be provided to eligible individuals.*

SOCIAL SECURITY NUMBER REQUESTS

Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.		
There is no current policy in place but one will be developed in FY 2011 once HHS has established and acceptable certification process with SSA. Our current client tracking system requires social security numbers in order to apply for assistance.	Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same.	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.
	Client Tracking system requires social security and Tribal ID numbers for FY2011. For non-legal resident's household members, ITIN numbers are required.	Tribal enrollment verification. We will wait until HHS has established an acceptable social security certification with SSA.
		Necessary outcomes from these systems and strategies
		All valid household members are reported for correct benefit determination.

Attachment – page 2

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.
	Government databases	*Necessary outcomes from these systems and strategies*

Our current enrollment, client tracking system, and other databases within the Community will be utilized to verify current applicants and household members.	Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying applicant information with other Tribal assistance programs. There is no current IGA/MOU/MOA with AZ State agencies for their databases.	Tribe will be cross checking with Tribal enrollment information which includes SSN and other Tribal information with the Tribal Enrollment Department and Client Tracking database. We will wait until HHS has established an acceptable social security certification with SSA.	*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 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*
Income eligibility is established through our assistance programs, including LiHEAP, in order to confirm income eligibility. Check stubs and other documentation from their employers to verify employment.	Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying applicant income with other Tribal assistance programs. Applicants may be required to provide letters from funding agencies with contacts to verify information further. Check stubs are required, such as payroll, which will provide contact numbers for further verification from employer.	No existing IGA, MOA/MOU exists between GRIC and State of Arizona that allows GRIC to verify income electronically currently exists. All verification of employment is done through check stubs or other documentation provided by the applicant and household member employer.	*Effective Income determination achieved through coordination across program and assistance program lines.*

PRIVACY-PROTECTION AND CONFIDENTIALITY

Describe the financial and operating controls in place in FY2010 that will continue in FY2011 to protect client information against improper use or disclosure.	Please highlight any controls or strategies from your plan which will be newly implemented as of FY2011.	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.	Necessary outcomes from these systems and strategies
Current employee policies and procedures on confidentiality that impacts both intake and financial processing are in place. Also, data systems have necessary tools to limit access and control who may or may not access the database.	Client Tracking software has been purchased and ready to be implemented on or before FY2011 that has security that will act as a vehicle to protect client information against proper use or disclosure. GRIC has a policy on confidentiality and any violation will require disciplinary action, including termination.		*Clear and secure methods that maintain confidentiality, and safeguard the private information of applicants.*

Attachment – page 3

LIHEAP BENEFITS POLICY

Describe FY2010 State 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 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.	Necessary outcomes from these systems and strategies

Gila River Indian Community must follow its purchasing and financial policies currently in effect for protecting against fraud when making payments or providing benefits to energy vendors on behalf of clients	Currently all applications for LiHEAP assistance are verified by the Finance Department to verify income and employment. Fraud prevention is in place that requires that all payments are made directly to the vendor by CSD staff.	If any improper payment is made, the Community will seek action through the Tribal Court systems to recoup the improper payments, including garnishments of payroll, per capita payments, etc.	*Only authorized energy vendors are receiving payments on behalf of LiHEAP eligible clients.*

PROCEDURES FOR UNREGULATED ENERGY VENDORS

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.	Please highlight any strategies policy 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 State is ensuring program integrity.	Necessary outcomes from these systems and strategies
All propane and wood vendors require business licenses by the Community, including tribal members, in order to do business with Gila River Indian Community.	On-going procedures established by Tribe's Property & Supply & Finance Department requires review of its current list of vendors with all necessary W9 and application information be completed by the vendor and verified.		*Participating vendors are thoroughly researched and inspected before benefits are issued.*

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

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.	Please highlight any policies for place for verifying vendor authenticity.	*Necessary outcomes from these systems and strategies*
	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?	
All regulated quasi-governmental and private vendors require business licenses by the Community, including tribal members, in order to do business with Gila River Indian Community. The Community will also develop agreements with all vendors which will include fraud prevention in FY 2011.	On-going procedures established by Tribe's Property & Supply and Finance Department requires review of its current list of vendors with all necessary W9 and application information be completed by the vendor and verified. Vendor may be verified through Arizona State Corporation Commission as well.	*An effective process that effectively confirms the existence of entities receiving federal funds.*
	Through the issuance of business license that the Gila River Indian Community requires for all vendors doing business within the boundaries of the Community (reservation).	

TRAINING AND TECHNICAL ASSISTANCE

AUDITS OF LOCAL ADMINISTERING AGENCIES

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.	Please highlight specific elements of your training regiment and technical assistance resources from your plan which will represent newly implemented in FY2011.	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.	Necessary outcomes from these systems and strategies
Through existing training on program and system guidelines are on-going at least once a year for Tribal staff, clients, and vendors. CSD LIHEAP staff also participate in annual energy conference which ACF provides training for Tribal Communities.	Tribe will provide and coordinate training efforts with vendors. Training will be done through our existing Energy conferences held for our clients throughout the year that includes our vendors.		The timely and thorough resolution of weaknesses or reportable conditions as revealed by the Internal Department audits performed.

Please describe the annual audit requirements in place for local administering agencies in FY2010 that will continue into FY 2011.	Please describe new policies or strategies to be implemented in FY2011.	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.	Necessary outcomes from these systems and strategies
The Tribe provides annual audits as required by the HHS funding agency as well as Internal audits preformed by the Tribe's Internal Audit Section.	**Client Tracking software has been purchased and ready to be implemented on or before FY2011 that requires data verifying applicant identities, income verification. Accessing other State governmental agencies will be utilized to verify energy vendors, as well as local vendors licensed by the Tribe to provide energy to our clients.**	The Tribe goes through an annual a Single Audit Act requirements as well as the Tribe's Internal Audit process.	*To reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.*

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.

The Tribe has other methods to assure reimbursement of any funds used in committing fraud, the applicant(s) will and may provide reimbursement, including accessing per capita funds, Tribal Court System, and prosecution.