

**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.

<b>State, Tribe or Territory (and grant official):</b>	<i>Mashpee Wampanoag Tribe</i>		<b>Date/Fiscal Year:</b> <i>2011</i>
<b>RECENT AUDIT FINDINGS</b>			
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 <del>relevant operations</del> have been resolved or corrected. If not, <del>please describe the</del> 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
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>	Material weaknesses and <del>other findings</del> have existed on a diminishing basis in the Tribal audits for FY2007, FY2008 and		<i>The timely and thorough resolution of weaknesses or reportable conditions as <b>revealed by the audit.</b></i>

	<p>FY2009. The Tribe has expanded fund accounting processes and software implementations, and is currently seeking to hire a qualified Comptroller to address all weaknesses and other items cited in our audits to date.</p>		
<p><b>COMPLIANCE MONITORING</b></p>			
<p>Describe the State's <del>FY2010 strategies that</del> will continue in <del>FY2011 for monitoring</del> 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><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><b><u>Back to top</u></b></p>	<p>Increased reporting between the Finance department and the LIHEAP program staff on a monthly basis is <del>being implemented</del> in FY2011 and facilitated by the use of the new</p>		<p><i>A sound methodology, <del>with a schedule</del> for regular monitoring and a more effective monitoring tool to gather information.</i></p>

	Sage Fund Accounting program that is currently upgrading our tribal financial and programmatic monitoring systems.		
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**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 <b>prevent fraud or</b> 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
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>		Regular monthly meetings will be implemented with our tribal departmental partners, and via the monthly Director's meeting, to seek input into the development of fraud detection	<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>

		processes and policies for the LIHEAP program.	
<b>VERIFYING APPLICANT IDENTITIES</b>			
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
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>	Verification of tribal membership is a current policy of the Mashpee Wampanoag Tribe that will continue in its effectiveness into the future to assure benefits are provided to eligible individuals.		<i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i>
<b>SOCIAL SECURITY NUMBER REQUESTS</b>			
Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or	Please describe whether the State's policy for requiring or not requiring Social Security numbers	If the State is not requiring Social Security Numbers of LIHEAP applicants	Necessary outcomes from these systems and strategies

household members applying for LIHEAP benefits.	is new as of FY2011, or remaining the same.	and/or household members, please explain what supplementary measures are being employed to prevent fraud.	
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>		The tribal membership verification process is completely adequate in order to prevent fraud and assure valid household members are reported for correct benefit determination.	<i>All valid household members are reported for correct benefit determination.</i>

**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,	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	Necessary outcomes from these systems and strategies
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Government death records, etc.)		strategy.	
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>		The verification of tribal membership is authenticated as necessary against the tribal membership database.	<i>Use of all available database systems to make sound eligibility determination.</i>

**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
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>		The Tribe simply is not supplied with adequate funding resources to do any new hires for the LIHEAP program that can further verify applicant household member incomes beyond the completely	<i>Effective income determination achieved through coordination across program lines.</i>

		adequate processes already in place and described in our Plan for verifying income via objective 3 <sup>rd</sup> party sources.	
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**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
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<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>  <a href="#">Back to top</a>	Appropriately locked cabinets, and locked databases with various levels of secure access to information house the financial and operating controls that protect and secure the confidentiality of applicant information.	During 2011 – further policies delineating our already in place practices will be completed. The recent hire of a full time HR Director is facilitating the completion and revision of existing Tribal Policies and Procedures.	<i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i>
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**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><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>As per our plan the transactions initialization, reporting and payment and reporting functions at the Tribe regarding LIHEAP payments are carried out in a check and balance manner between program staff, and the finance department. This process has resulted in a 100% no fraud history within our LIHEAP program as regards successful vendor payments.</p>		<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

**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 unregulated 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><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>By Sep 2011 The Tribe will develop policies and procedures to assure that participating vendors are thoroughly researched and inspected before benefits are issued.</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>

**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>
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<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>By Sep 2011 The Tribe will develop policies and procedures to assure that participating vendors are thoroughly researched and inspected before benefits are issued.</p>	<p><i>An effective process that effectively confirms the existence of entities receiving federal funds.</i></p>
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**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>
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<p><i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy</i></p>		<p>By Sep 2011 The Tribe will develop policies and procedures to assure that participating vendors are</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the</i></p>
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<i>documents</i>		thoroughly researched and inspected before benefits are issued.	<i>audit.</i>
<b>AUDITS OF LOCAL ADMINISTERING AGENCIES</b>			
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
<i>please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i>	Annual audits in compliance with OMB A-87 and OMB A-133 are completed by the Tribe for all federally funded tribal activities.		<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>

**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.