

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.

State, Tribe or Territory (and grant official):	Nez Perce Tribe of Idaho	Date/Fiscal Year: July 30, 2010 FY '10
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.	Necessary outcomes from these systems and strategies
No audit finding of material weaknesses and reportable conditions or questioned costs in prior 3 years.	None cited: will continue operating at same level.	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>Checks and balances are in place when requesting payments to vendors., both at eligibility determination and financial accountability. Eligibility is checked and verified. Vendors are public utilities and W9's are required for smaller businesses.</p>			<p>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</p>

FRAUD REPORTING MECHANISMS

<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>Please highlight any tools or mechanisms from your plan which will be newly implemented in FY2011, and the timeline for that implementation.</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><i>Tribal Newspaper, will carry fraud reporting numbers also with other information about LIHEAP Program. Applications as well show the fraud statement and penalties, with phone number and fax.</i></p>	<p>Postings at area bulletin boards, and possibly action by executive committee to include in tribal minutes to all enrollees.</p>		<p><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></p>

VERIFYING APPLICANT IDENTITIES

<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><i>The LIHEAP program serves only eligible enrolled members of the Nez Perce Tribe and other Federally recognized Tribe living on the reservation. Tribal picture I.D.'s is the first requirement. Also require SSN's.</i></p>	<p>May also require another piece of picture ID such as driver's license or State ID if applicant is unknown to staff.</p>		<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>

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.	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.
Have required SSN for Adult HH members.	remain the same	
		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, 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.
There is no access to State or Government systems or databases. No Tribal Program has access.	unknown	Through local entities to verify employment such as Tribal Enterprises and local business. Tribal enrollment office which requires stringent verifications for eligibility such as ancestral records, paternity proof, sworn statements, etc.
		Necessary outcomes from these systems and strategies
		Use of all available database systems to make sound eligibility determination.
VERIFYING APPLICANT INCOME		

<p>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.</p>	<p>State new hires directories are not available to NP Tribe, nor are they used by the LOCAL Idaho Dept of labor.</p>	<p>Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY2011.</p>	<p>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?</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>State new hires directories are not available to NP Tribe, nor are they used by the LOCAL Idaho Dept of labor.</p>	<p>Not Available</p>	<p>Income verification is required by pay documentations for adult household members. Tribal enterprises and local employers and TERO office verify employment. Also statement of no income is required stating reason.</p>	<p>Effective income determination achieved through coordination across program lines.</p>	<p>Necessary outcomes from these systems and strategies</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 information against improper use or disclosure.</p>	<p>Department follows the Privacy Act and employees sign a confidentiality statement. Release of information obtained by client for information. Confidentiality Training is held yearly by the Tribe.</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 from these systems and strategies</p>
<p>Department follows the Privacy Act and employees sign a confidentiality statement. Release of information obtained by client for information. Confidentiality Training is held yearly by the Tribe.</p>	<p>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</p>	<p>Income verification is required by pay documentations for adult household members. Tribal enterprises and local employers and TERO office verify employment. Also statement of no income is required stating reason.</p>	<p>Effective income determination achieved through coordination across program lines.</p>	<p>Necessary outcomes from these systems and strategies</p>

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 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>Utility Vendors are regulated utilities. Wood and oil vendors must have a w-9 must be in place with accounting department before payment is made. Payment is made after client receives wood.</p>	<p>Procedures have been satisfactory.</p>		<p>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</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>Same as above. Payments is not made until wood is delivered and proper tax and W-9 must be in place. Out of the Households served an estimated number of 5 household use vendors that are not public utilities.</p>	<p>Procedures have been satisfactory</p>		<p>Participating vendors are thoroughly researched and inspected before benefits are issued.</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>
<p>Same as above.. Wood Vendors are certified through the Tribal Forestry department..</p>			<p>An effective process that effectively confirms the existence of entities receiving federal funds.</p>

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 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 from these systems and strategies</p>
<p>Through public meetings information about the LIHEAP Program is disseminated to potential applicants. Technical assistance from governmental staff (Zack) is always available to our program and staff. LIHEAP Conference is a tool for sharing with other Tribes and gets better every year. Would like to see a workshop specifically for Tribes. The LIHEAP program is just one of the Financial Assistance Programs administered by our department. Eligibility is similar and application process is similar.</p>	<p>Will try to have training for all Programs on fraud prevention that would also be open to the public.</p>		<p>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</p>

AUDITS OF LOCAL ADMINISTERING AGENCIES

<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>LIHEAP Program funds are audited every FY by outside entity as required by the Single Audit Act.</p>	<p>None are needed</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.