

11-1-10

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.

OST LIHEAP OGLALA SIOUX	October 15, 2010
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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 tribal programs are under a blanket audit. These audits are then sent to a clearing house, which can be accessed by the funding agency.	NA	NA	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>All requests are checked for eligibility. They are sent to contracts and comptroller for compliance before payments can be made.</p>	<p>See attachment/monitoring plan Attachment was included but it also can be reviewed on page 22 of the LIHEAP plan that was submitted.</p>	<p>NA</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 IIHEAP 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>The Oglala Sioux Tribe does not have a Fraud Reporting Hotline. But, fliers are posted at all public places if fraud is suspected and/or observed. These individuals can access the website of the Oglala Sioux Tribe or call the Tribal office or the switch board operator to call or report suspected fraud. Switch board operator will then transfer to the compliance officer or comptroller. Then they report to OIG for investigation. Complainant name held in confidentiality. They may use the website to obtain phone numbers if they choose to call a suspected fraud.</p>	<p>The Office of the Comptroller investigates allegations of fraud, waste, abuse, and misconduct by Oglala Sioux Tribe employees, contractors, and grantees. The office of the comptroller is a department of the Oglala Sioux Tribe that reports both to the Attorney General and Council issues that affect the organization personnel or operations.</p>	<p>The office of the Comptroller has jurisdiction over all complaints of misconduct against Oglala Sioux Tribe employees. You may report waste, fraud, abuse or misconduct concerning Oglala Sioux Tribe employees, contractors, and grantees to the office of the Comptroller.</p>	<p>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.</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>All applicants who apply will be checked and crossed checked with social security numbers, locations of homes and household members. A database is used which contains name, birthday, and social security number. All individuals listed on application are required to have a social security number listed to verify identity.</p>	<p>We can verify each applicant's information receding ten years. Any new individuals listed from prior application are cross checked with the database. If the individual is not listed, a copy of the social security card will be required.</p>		<p>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</p>
<p>SOCIAL SECURITY NUMBER REQUESTS</p>			
<p>Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</p>	<p>Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>Social security numbers are requested for services. These can be checked receding ten years. All cards must be original to verify individual if not listed in prior database.</p>	<p>If there is an error in the social security number verification of social security card will be requested. No services granted until social security numbers are verified.</p>	<p>NA</p>	<p>All valid household members are reported for correct benefit determination.</p>

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

<p>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.)</p>	<p>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY2011.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>If there is a question regarding a social security number then social security cards are requested.</i></p>	<p>NA</p>	<p>NA</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>

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>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><i>We are requesting recent original income verification, which includes check stubs, award letters, employer's statements which will be photocopied by LIHEAP certifier. The certifier will then initial copied document for verification. If not income is reported in the household we</i></p>	<p>NA</p>	<p>NA</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></p>

request a written statement from the client as to how daily needs are met. We calculate income prior three months for exact income. Income guidelines are used for services to eligible clients. Our LIHEAP office uses 150% and 75% of poverty guidelines.

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 from these systems and strategies</p>
<p>All eligible clients' information will be held confidential. All applications that are submitted to our office are locked away and recorded in the database. All data in the computer is secured with a password access. All staff are informed of the privacy policy and punishable by law if privacies are released without written consent from the clients. Staff members who release information without consent of the clients are terminated immediately and charges will be brought against them. Release of information will be put in writing by clients.</p>	<p>NA</p>	<p>NA</p>	<p>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants</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 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>Clients are notified of eligible amounts. All applications are two part and the second part is mailed back to the client with income calculations and eligibility. They have a right to appeal the income calculations. Income guidelines are then used to determine eligibility regarding family size and type of income. Regarding all propane deliveries; all tickets must be metered for gallons delivered. All tickets must be signed by clients to confirm the delivery. Request for electrical assistance must have light bill attached to verify account number. All payments for electricity are made directly to the electrical companies.</p>	<p>Over income are not eligible.</p>	<p>All clients who are requesting wood are informed of the wood quality and quantity by the use of local newspapers, fliers that will be posted at tribal government centers and all information regarding quality and quantity is attached to the LIHEAP application. If the client is satisfied by the quality and quantity of the wood, the client then signs the ticket to confirm the satisfactory of the delivery which will verify payment to the vendor. (see attached flier)</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>NA</p>	<p>NA</p>	<p>NA</p>	<p>Participating vendors are thoroughly researched and inspected before benefits are issued.</p>
<p>VERIFYING THE AUTHENTICITY OF ENERGY VENDORS</p>			
<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>All vendors will sign a vendor agreement with LIHEAP. They must have a business license with the Oglala Sioux Tribe and State of South Dakota. All clients must sign for services received.</p>	<p>Proof of business license. Propane vendor's tickets must be metered and signed. Electrical payments must be accompanied by name and account number.</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>Training is given to employees for certifying applications for eligibility of clients.</p>	<p>NA</p>	<p>NA</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>
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<p>The tribe does have in place an annual Single Act Audit A-133</p>	<p>NA</p>	<p>NA</p>	<p>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</p>
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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: Oglala Sioux Tribe

FY 2011

MONITORING PLAN

<u>COMPLIANCE</u>	<u>ACTIVITY</u>	<u>MONITORING</u>	<u>RESPONSIBILITY</u>
Use funds for approved plan and activities under the law	submit application to HHS for direct funding	application review by OST Contracts office and approved.	LHHEAP Director OST Contracts
	seek clarification from Tribal Attorneys on program issues	review program operation compliance with the Tribe's plan and law	LHHEAP Director OST Contracts
	provide emergency assistance activities and services	insure legal questions are referred to Tribal Attorneys and a correspondence file is maintained	OST Contracts
	make referrals to other Tribal and State Agencies for other programs	check applications periodically for error in eligibility determination-on-going	LHHEAP Director
Coordination	develop a budget use cufi accounts	check files to see if these households are referred to other programs	LHHEAP Director LHHEAP Staff
Administrative costs	establish fiscal control	check periodically to see that expenditures are in compliance with-in the law and do not exceed the budget	LHHEAP Director OST Accountant
	make a proposed plan available for public comment	work with fiscal accounting office to see that payments are processed timely; that budgets and other required reports are processed in a timely manner	LHHEAP Director OST FAO Office
Public participation	data collected and compelled	review a method of notifying the public to assure that they are informed of their right to comment	LHHEAP Director LHHEAP Staff
Data collection	make Tribe aware of the requirements to cooperate under the law	check to assure process is functioning	LHHEAP Director
Federal investigation		passed by resolution	LHHEAP Director Legal Staff OST FAO Office

The Energy Assistance office would like to inform all wood users of the following:

1. One cord of wood is 4 feet high 4 feet wide 8 feet long. Each piece of wood is 16 inches in length and split to stove size.
2. Attached are photos of what each cord looks like stacked and loaded in a pickup. Pickup shown in photo is 1 ton.
3. When energy has wood deliveries to eligible clients the above photos is what the wood should be like when delivered. If you are not satisfied with the wood that is being delivered, you have the right to refuse the load of wood and tell the vendor why you refuse the load and do not sign the ticket. Therefore it is necessary to have a phone number so the wood vendor could verify when you will be home so you can verify the quality and quantity of the wood being delivered to you residence.





Valladares, Margarita (ACF)

From: OST LIHEAP [osteandh@gwtc.net]
Sent: Monday, November 01, 2010 11:28 AM
To: Valladares, Margarita (ACF)
Subject: Monitoring Report

GRANTEE: Oglala Sioux TribeFY 2011**MONITORING PLAN**

<u>COMPLIANCE</u>	<u>ACTIVITY</u>	<u>MONITORING</u>	<u>RESPONSIBILITY</u>
Use funds for approved plan and activities under the law	submit application to IHS for direct funding	application review by OST Contracts office and approved.	LIHEAP Director OST Contracts
		review program operation compliance with the Tribe's plan and law	LIHEAP Director OST Contracts
	seek clarification from Tribal Attorneys on program issues	inquire legal questions are referred to Tribal Attorneys and a correspondence file is maintained.	OST Contracts
	provide emergency assistance activities and services	check applications periodically for error in eligibility determination-on-going	LIHEAP Director
Coordination	make referrals to other Tribal and State Agencies for other programs	check files to see if these households are referred to other programs	LIHEAP Director LIHEAP Staff
Administrative costs	develop a budget use cdf accounts	check periodically to see that expenditures are in compliance with-in the law and do not exceed the budget	LIHEAP Director OST Accountant
		establish fiscal control	work with fiscal accounting office to see that payments are processed timely; that budgets and other required reports are processed in a timely manner
Public participation	make a proposed plan available for public comment	review a method of notifying the public to assure that they are informed of their right to comment	LIHEAP Director LIHEAP Staff
Data collection	data collected and compiled	check to assure process is functioning	LIHEAP Director
Federal investigation	make Tribe aware of the requirements to cooperate under the law	passed by resolution	LIHEAP Director Legal Staff OST FAO Office