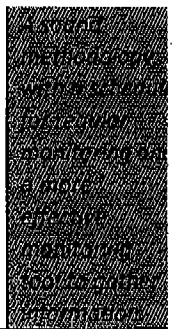


**ATTACHMENT 1
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
Low Income Home Energy Assistance Program (LIHEAP)**

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): Penobscot Indian Nation		Date/Fiscal Year: 2011
RECENT AUDIT FINDINGS		
Describe any audit findings or material weaknesses and reportable conditions, questioned costs, and other findings cited in FY 2010 or the prior three years, in annual audits, state monitoring assessments, Inspector General reports, or other Government Agency reports of LIHEAP agency finances.	Please describe whether identified 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.
* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents	There were NO findings	N/A
COMPLIANCE MONITORING		
Describe the State's FY2011 strategy that will continue in FY2012 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.

<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>The application is officially monitored after being certified before benefits can be received and again after a letter of notification has been sent out. Because we know our clients, the applications are unofficially monitored as they are handed off from person to person.</p>	<p>N/A</p>	
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FRAUD REPORTING MECHANISMS

<p>For FY2010 (initial) 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, hotline, websites, email, addresses, etc. (b) strategies for leveraging 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 applicants and stakeholders involved with your program in detecting fraud.</p>	<p>Necessary outcomes of 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>N/A</p>	<p>We are familiar with all our clients because they are tribal members. Clients and community members provide tips about household members and other information required for LIHEAP.</p>	<p>N/A</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 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>* 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>N/A</p>	<p>If there was a person, who we were not familiar with, we would require identification and verify them by census list.</p>	<p>N/A</p>

SOCIAL SECURITY NUMBER REQUESTS

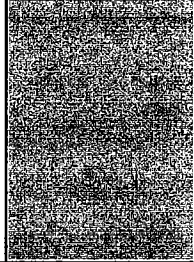
Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.	Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same.	If the 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.	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>	We have and will continue to require all household members to provide their Social Security numbers.	N/A	<i>All valid household members are reported for correct benefit determination.</i>

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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.	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>	TANF, child support, Social Security, and unemployment governmental databases are used to verify social security numbers.	N/A	<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>	Applicants are required to sign an income verification form, give us all places of employment for the prior 12 months and we send to these places for information. If it is noticed there is a period without income we ask the client for additional information, and	N/A	<i>Effective income determination achieved through coordination across program lines.</i>

unemployment. Depending on the family make up we may send to other agencies like TANF and child support even if they don't claim to receive it.




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.
<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>Client's files are kept in a locked filing cabinet and staff all sign confidentiality forms before they begin work.</p>	<p>N/A</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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
<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>We have agreements and relationships with all our vendors. If they have a question, they always are sure to make contact with us and ask to keep from making a mistake or allow something not allowed.</p>	<p>N/A</p>	<p>Approved energy vendors receiving the number of benefits that qualify them</p>

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 unregulated 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
<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 stated previously we have relationship with our vendors, where they call with all questions. Vendors also sign an agreement with us that clearly states all our expectations.</p>	<p>N/A</p>	<p>Approved vendors receiving the number of benefits that qualify them</p>

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 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 State can ensure that funds are being distributed through valid intermediaries	Necessary outcomes from these systems and strategies

<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>All vendors need to sign an agreement that outline our expectations, also they have all been in business for many years, and have good standing in the community. Our wood vendor is a tribal program.</p>	<p>N/A</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 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><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>After speaking with Trudy Hairston from ACF we were made aware of training offered and plan to attend in June 2011.</p>	<p>N/A</p>	<p>The training and strategic resolution of responsibilities of responsible individuals or evaluation by the grantee.</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 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 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>We are audited yearly, and this will continue.</p>	<p>N/A</p>	<p>Regular monitoring payments and/or local agency benefits are provided 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.

PENOBSCOT NATION
DEPARTMENT OF HUMAN SERVICES

FACSIMILE TRANSMITTAL SHEET

TO:	Trudy Hairston	FROM:	Reese Chavaree-Hildreth
COMPANY:	ACF	DATE:	10/18/2010
FAX NUMBER:	(202)401-5661	TOTAL NO. OF PAGES INCLUDING COVER:	23
PHONE NUMBER:	(202)401-4853	SENDER'S PHONE NUMBER:	(207)817-7491
RE:	LIHEAP Forms	YOUR FAX NUMBER:	(207)827-2937

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Please let me know if there is anything else you need.