

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):
 Pueblo of Jemez

Date/Fiscal Year:
 Federal Fiscal Year 2011

RECENT AUDIT FINDINGS

<p>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.</p>	<p>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.</p>	<p>If there is no plan in place, please explain why not.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>In FY 2008, there was an audit finding with a material weakness specific to report preparation.</i></p>	<p>The audit finding was resolved and did not repeat in the FY2009 audit. Procedures were put in place to insure proper close out was conducted with secondary review processes.</p>		<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

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>
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The Pueblo of Jemez strategies for compliance monitoring will continue into the FY2011. The Pueblo of Jemez has a fulltime compliance officer to self audit programs for adherence to agency requirements and scope of work. The Pueblo of Jemez procurement process is developed and followed to ensure compliance, which includes periodic auditing of programs for adherence to regulations.

This grant will be put in the schedule of the Compliance Officer. Policies, procedures, and practices will detect noncompliance and safe guard grant-related assets.

A sound methodology, with a schedule for regular monitoring and more effective monitoring tools to gather information.

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>
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<p>Addresses and Telephone numbers to appropriate agencies to report fraud will be included on all announcements/flyers posted within the Pueblo of Jemez, advertising LIHEAP Services/benefits. The Pueblo of Jemez currently participates in the WETIP program which provides a toll free number to report crimes.</p>	<ul style="list-style-type: none"> • Phone number on all flyers, application will be included. Information will be displayed in prominent areas. • Customers and suppliers/vendors will be informed during intake, through separate mailings or when entering into contracts. • The Pueblo of Jemez is implementing a new website that will allow email communication for any concerns including fraud or potential fraud. 	<p>Develop training for all levels from board to staff. Policy will be developed and implemented to include: tighter controls, new responsibilities, and other data requiring consistent documentation to ensure consistent compliance measures. In addition the Pueblo of Jemez is in the process of developing an integrity program which will include an employee code of conduct and a hotline for reporting fraud waste and abuse.</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>
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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>
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Tribal community members identities will be based on local reservation/Pueblo of Jemez postal addresses; street addresses and through the Pueblo of Jemez Tribal Enrollment Census. We will require social security cards of all household members to be submitted with the application.

Social Security Cards will now be required to be submitted with the applications. Insure eligibility is in the Compliance plan.

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.

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

Beginning in FY 2011 Social Security numbers will be a requirement for all applicants applying for LIHEAP. If a social security number is not provided at the time of intake, the application is put on hold until all necessary documentation is provided and complete.

The requirement to provide social security numbers is a new requirement for FFY 2011 LIHEAP Application.

All valid household members are reported for correct benefit determination.

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>The Pueblo of Jemez has administered the LIHEAP funds for several years and haven't had a reason to cross check social security numbers and ID information with existing government data bases. Verification on household income and members are completed during application intake with the applicant.</i></p>	<p>For compliance of the Integrity Assessment Supplement, the Pueblo of Jemez LIHEAP will, as deemed necessary, make contact with the local Social Security Administration office to verify social security numbers and ID information.</p>		<p><i>Use of all available database systems to make source 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>The Pueblo of Jemez has not used any State Directories in the past to cross check employment/income for any applicant.</i></p>		<p>Employers are contacted to verify income as deemed necessary. Most recent copies of earned income, checks, benefit award letters and self employment earnings are required. Earnings from the last 30 days are a requirement from employed applicants. For self employed applicants we accept income statements for the last 90 days or the prior year income tax statements.</p>	<p><i>Effective income determination achieved through coordination across program lines</i></p>

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>The Pueblo of Jemez employees sign a confidentiality agreement. Failure to adhere to the agreement will result in disciplinary action up to and including termination. All applicants will be informed and made aware of the confidentiality regulations. All LIHEAP files and documentation are in a secure location under lock and key. Only the program manager and program personnel responsible for LIHEAP services have access to the LIHEAP Program file key.</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><i>The Pueblo of Jemez procurement policy requires adequate documentation for all transactions which include payment to vendors on behalf of clients. Upon the deliverance of services the LIHEAP Program requires a receipt be mailed to the program assuring the correct account was credited with the correct amount. All transactions are subject to review.</i></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 un-regulated 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>The Pueblo of Jemez utilizes unregulated vendors of which an agreement is made for the sale delivery and payment. The LIHEAP coordinator controls the contract and payment is made based on the delivery, which requires a signed invoice or statement.</i></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>
<p>There are only four propane vendors and one electric service provider that provide services within the Pueblo of Jemez. LIHEAP works with no more than three wood vendors, under contract for the Fiscal Year which is adequate for the wood demand here in Jemez.</p>	<p>A meeting will be held with the vendors at the start of the new fiscal year to outline requirements of the LIHEAP.</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>The Senior Program personnel on occasion provide assistance with intake only. The LIHEAP personnel provide training on how to conduct the intake process. Two LIHEAP personnel are the only ones to complete the eligibility and final approval process, and coordinate vendor services. Clients are informed of fraud and possible consequences of fraud, during intake and on the signed application. A coordination meeting is held with the vendors at the start of each Fiscal Year to explain what would constitute a payment. Any training provided by LIHEAP will be attended by the Jemez LIHEAP personnel.</p>			<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></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><i>The Pueblo of Jemez is required to perform annual audits in compliance with A-133 the Single Audit Act. Annual audits are submitted to the Federal Audit clearinghouse nine months after the end of the fiscal year.</i></p>	<p>No new policies other than GASB or SAS standards mandated by Generally Accepted Accounting Principles.</p>	<p>N/A</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></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.