

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

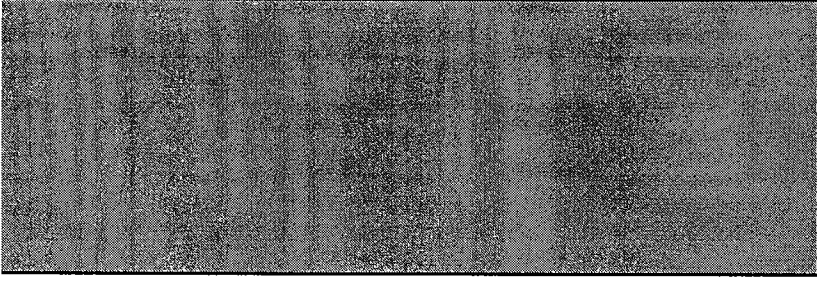
ABSTRACT:

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): Quileute Indian Tribe	Date/Fiscal Year: August 27, 2010/ FY2011
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

<p>The Tribe completes annual audits under the Single Audit Act requirement. LIHEAP funding and expenditures do not meet the minimum requirements for inclusion in annual audits.</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><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit</i></p>
<p>COMPLIANCE MONITORING</p>			
<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/or local administering agencies.</p> <p>The Tribe has conducted an informal review by the Chief Financial Officer in conjunction with the Acting Human Services Director of process and procedures to verify documentation and calculation of eligibility, payments to vendors and recordkeeping.</p> <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference</i></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>Compliance with LIHEAP Policy and Procedure is verified through periodic financial reviews conducted jointly by the CFO and Human Services management.</p>	<p><i>A sound methodology with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

excerpts from relevant policy documents



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 in detecting fraud.</p>	<p>Necessary outcomes of these strategies and systems</p>
<p>Fraud can be reported via telephone, email or in writing to our Human Services Department, Personnel Office or to the Tribal Office. Any reports are documented and delivered to the Tribal Council or law enforcement as deemed appropriate for investigation and response.</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>Beginning in FY 2011, the Quileute Tribe will implement an advertising strategy that includes announcements in the local newsletter, fliers and brochures. This information will educate the public on the definition of fraud and the mechanisms available for reporting fraud.</p>	<p>Current mechanisms to prevent fraud or improper payments include use of the Tribal Assistance System (TAS) database for documentation and calculation of eligibility and payments to vendors. Payments are not approved or processed without TAS documentation.</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>The LIHEAP Program requires adult identification and proof of Tribal enrollment to verify identity. Applications include a section for social security numbers. * please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</p>	<p>Beginning in FY 2011, social security numbers will be verified.</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>The Tribe requests social security numbers for all household members on the application for assistance.</p>	<p>Beginning in 2011, the Tribe will require listing of a social security number on the application. In previous years, inclusion of the social security</p>		<p>All valid household members are reported for correct benefit determination.</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>number has been optional.</p>	
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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>Use of all available database systems to make sound eligibility determination.</i></p>
<p>The Tribe currently has a data share agreement with the State of Washington for access to ACES database. We also verify enrollment with the Tribal Enrollment Officer.</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>Newly implemented will be inclusion of LIHEAP on the Data Share Agreement with the State of Washington for LIHEAP Coordinator access to ACES. FY 2011 will be the year in which the agreement is amended, which could take a significant portion of the fiscal year to be accomplished.</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>Income eligibility is determined through copies of paystubs or other household income. Verification of receipt of TANF, Food Stamps, GA or other assistance programs is determined locally through client consent to release.</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>None</p>	<p>We will continue to verify income information in the same manner.</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></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>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>

All client information is considered confidential. Employees sign confidentiality agreements upon employment. Files and documents containing identifiable information are kept in locked file cabinets in the LIHEAP office. Offices and buildings are locked when employees are absent and outside of business hours. Client names or other identifiable information is not sent to Accounting with the check request.

** please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents*

Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.

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>Payment amounts and eligibility are automatically calculated by the Tribal Assistance System (TAS). <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>Purchase requisitions must be completed by the LIHEAP Coordinator and signed by the Human Services management. Requests cannot be approved without a verified TAS-generated check request.</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>N/A All vendors and services are regulated. <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><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></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 UIHEAP, as part of the State's procedure for averting fraud.</p> <p>Local energy vendors are verified. Vendors of wood must complete a detailed contract and submit signed invoices on a per client basis.</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>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>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>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</p>		<p>Our program is very small. One employee administers LIHEAP. Concerns are dealt with through individualized training and the Personnel Office, if necessary.</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>N/A</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><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.