

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): Rosebud Sioux Tribe	Date/Fiscal Year:		
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

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

The Rosebud Sioux Tribe LIHEAP Program had three audit findings for the FY'09 heating season. These finding has been found and stated as follows:

1. During the grant year, the program was allowed to spend \$144,866 for administration and planning. They spent \$169,989, or \$25,123 over the amount allowed. Questioned Costs: \$25,123. This amount has been charged to the Rosebud Sioux Tribe Casino Account. This amount of \$25,123 has

been repaid to the LIHEAP account.

2. One household was in question due to the fact that the head of household lost his job and was to bring in documentation that his job had ended.
3. Two households had been certified for a smaller amount, These recipients had returned to the office at a later date and requested their income for their personal use. We did not have a working copy machine at this time and the staff had allowed them to take it and get a copy and bring it back. These recipients did not bring it back.

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><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 LIHEAP Director has monitored the budget very closely to ensure the proper amount of allowable costs for the administrative budget has been expended for FY'10. This close monitoring will continue to ensure this will not happen again. There will be close monitoring to the applications brought in by the clients by the LIHEAP staff. There will be monthly reviews on the applications to ensure proper documentation is in place. When the copy machine is not available, the information that need to be verified will be documented by the LIHEAP staff in the clients file.</p>		<p><i>A sound methodology with a schedule for regular monitoring and more effective monitoring tool to gather information.</i></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>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</p>	<p>The LIHEAP Program is in the process of creating a website and a telephone hotline for fraud and abuse for the FY'2011.</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>
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<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 applicants must provide Social Security numbers of all household members including head of household. Head of household must provide Tribal Identification and Electricity account number. This prevents any households applying two in household.</p>		<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>
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SOCIAL SECURITY NUMBER REQUESTS

<p><i>Describe the State's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</i></p>	<p><i>please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same.</i></p>	<p><i>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.</i></p>	<p><i>Necessary outcomes from these systems and strategies</i></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>The same</p>		<p><i>All valid household members are reported for correct benefit determination.</i></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>* 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>There is no database utilized in the Rosebud Sioux Tribe LIHEAP Program.</p>		<p>Use of all available database systems to make sound eligibility determination.</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>* 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>There are no new policies available for FY'2011. The RST LIHAP will continue policies as usual. The RST LIHEAP Program requires all households to provide proof of income, recent check stubs for employment verification, fixed</p>		<p>Effective income determination achieved through coordination across program lines.</p>

income (monthly income) households must provide copy of checks or bank statement (portion of statement that has name and deposit amount.), income verified through another entity (housing office, commodity office, Dept. of Social Services, etc.) Verifying this income is collected by providing a release of income statement signed by household) All households must provide proof of income. This verification of income is stored in each households file. Households do not receive assistance until proof of income is verified.

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>
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<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 FY'2011 Rosebud Sioux Tribe LIHEAP Program applications are housed in a room within the LIHEAP Program under lock and key. All applications are locked in a secure file cabinet.</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>
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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>* 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 RST LIHEAP Program will not implement any new policies on the vendors, due to policies in place already, that prevent fraud or abuse. All vendors must provide a propane ticket verifying gallons filled stamped, date and driver verification. Electricity payments have a electricity statement verified by each electricity vendor. Wood Vendors are required to bring in signed receipt upon delivery. Wood deliveries are randomly monitored for verification of proper quality, quantity, and make ensure the household uses the wood themselves.</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>* 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 do not do business with any vendors of this kind. The RST LIHEAP Program staff is required to determine if the household is eligible to LIHEAP Benefits by utilizing the federal guidelines. To determine benefit amount the LIHEAP Staff is also required to utilize the payment matrix for the RST LIHEAP Program. All benefits amounts are determined and followed up with monthly monitoring to make sure all households receive the correct amount of benefits by income determination.</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><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>An Excluded Parties List System is done on each Vendor and each form is attached before any checks are made available to the vendor.</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>The Rosebud Sioux Tribe LIHEAP Program will have monthly training session for the staff to inform proper evaluations for detecting fraud and abuse.</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><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 Rosebud Sioux Tribe has annual auditors auditing records from the RST Finance Department and the RST LIHEAP Program. Auditors will come into the RST LIHEAP Program and test applicants to verify eligibility, amount qualified, verification of documentation required for application. The Rosebud Sioux Tribe LIHEAP Program complies with the Single Audit Act required by our funding agency.</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.