

TANANA CHIEFS CONFERENCE
PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

The Tanana Chiefs Conference FY2011 plan includes administrative policies and action steps for preventing and detecting fraud, abuse, and improper payments. It also includes a number of changes to the TCC FY2010 plan for preventing and detecting fraud, abuse and improper payment prevention.

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| Tribe (and grant official): Tanana Chiefs Conference Don Shircel, Client Development Director | Date/Fiscal Year: 9/1/10 |
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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, Tribe 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 |
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| <p><i>Auditors found one over payment and one underpayment.</i></p> <p><i>The under payment was due to a manual computation error.</i></p> <p><i>The over payment was due to human error (the eligibility worker failed to include all of the income listed on the application in the computation determining the benefit level).</i></p> | <p>All findings were resolved.</p> <p>Program staff have been directed to use the LIHEAP data software program only, to compute benefit levels (no manual computation).</p> <p>Monthly reviews of a sample of case files will be conducted by the LIHEAP team to assure quality control in regards to case processing, eligibility and benefit determination.</p> | <p>N/A</p> | <p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p> |

| COMPLIANCE MONITORING | | | |
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| Describe the Tribe'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. | 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 Tribe is verifying that LIHEAP policy and procedures are being followed. | Necessary outcomes from these systems and strategies |
| <i>The Client Development Director, who has been administering the TCC LIHEAP for the past 27 years, samples applications received on a monthly basis to test for program compliance with state and federal statutes, regulations current program instructions.</i> | All LIHEAP supervisory and administrative support staff will receive a minimum of four hours of training from the Client Development Director regarding the compliance parameters of state and federal program rules and regulations and jointly participate in the monthly monitoring activities of the Client Development Director. Test sample case files will be jointly reviewed by the full contingent of LIHEAP program staff. | N/A | <i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i> |

| FRAUD REPORTING MECHANISMS | | | |
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| 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. | Please highlight any tools or mechanisms from your plan which will be newly implemented in FY2011, and the timeline for that implementation. | 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. | Necessary outcomes of these strategies and systems |
| <i>TCC maintains a toll free 1 800 telephone hot line available for to the public to report fraud.</i> | N/A | N/A | <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> |

VERIFYING APPLICANT IDENTITIES

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| Describe all FY2010 Tribe's policies continuing in FY2011 for how identities of applicants and household members are verified. | Please highlight any policy or strategy from your plan which will be newly implemented in FY2011. | If you don't have a system in place for verifying applicant's identities, please explain why and how the Tribe is ensuring that only authentic and eligible applicants are receiving benefits. | Necessary outcomes from these systems and strategies |
| <i>TCC employs, locally-based Tribal Workforce Development Specialists and Tribal Family/Youth Specialists in each of the 37 isolated/rural communities served by the TCC LIHEAP who review each completed application submitted locally and certify information regarding applicant identity and household composition.</i> | N/A | N/A | <i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i> |

SOCIAL SECURITY NUMBER REQUESTS

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| Describe the Tribe's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits. | Please describe whether the Tribe's policy for requiring or not requiring Social Security numbers is new as of FY2011, or remaining the same. | If the Tribe 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>Social Security Numbers are required for all household members indicated in the application for assistance as indicated on page 1 of the Application Form which can be found Attachment F of TCC's FY 2011 LIHEAP plan.</i> | This TCC LIHEAP program policy has been in place for since 1980 | N/A | <i>All valid household members are reported for correct benefit determination.</i> |

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

| <p>Describe if and how the Tribe 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 Tribe 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> |
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| <p><i>TCC's LIHEAP program is administered within its Client Development division which also administers Tribal TANF, General Assistance, Child Care Assistance, Employment and Training, Education and Vocational Training and Head Start programs which all document applicant/participant household income to determine eligibility. These programs share data regarding Household composition and verified income documentation on file. An electronic data interface allowing access to Unemployment Compensation income verification is now available from the state of Alaska through a separate agreement.</i></p> | <p>The agreement for the data interface with the state's Unemployment Compensation office was approved in August 2010, and will be available for implementation during the FY 2011 program.</p> | <p>N/A</p> | <p><i>Use of all available database systems to make sound eligibility determination.</i></p> |

VERIFYING APPLICANT INCOME

| <p>Describe how the Tribe 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 Tribe 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> |
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| <p><i>TCC has access to the state of Alaska, External Information System (EIS) and utilizes the system to verify income for persons included in their system.</i></p> | <p>N/A</p> | <p>N/A</p> | <p><i>Effective income determination achieved through coordination across program lines.</i></p> |

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 |
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| <p><i>As part of the application process, applicants sign a release of information for the sole purpose of determining eligibility.</i></p> <p><i>TCC Personnel Policies (which include all accounting and program staff) prohibit the disclosure of confidential information [resulting in immediate termination from employment.]</i></p> <p><i>TCC manual filing systems and accounting and program data storage software include the following; locking cabinet storage and firewall and user security protections to safeguard unauthorized access</i></p> | <p>N/A</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 Tribal 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 Tribe 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 |
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| <p>TCC maintains Accounting: The Tanana Chiefs Conference has an automated accounting system. The accounting format utilized by Tanana Chiefs Conference has been approved by State and federal auditors as meeting all criteria to comply with State and federal grants and contract reporting requirements.</p> <p>b) Monitoring: The TCC automated accounting system and program reports also allows the LIHEAP to be monitored regularly for accuracy. The Tanana Chiefs Conference staff will make every effort to see that the program is delivered in compliance within the regulations of LIHEAP by conducting monthly random samples of applications paid and testing them for accuracy, compliance and fraud.</p> <p>c) Audit: An independent audit is a standard procedure of Tanana Chiefs Conference accounting system. As part of the audit, a random sample of applications from the households served will be reviewed to assure eligibility and proper payment dispersal.</p> <p>The use and involvement of local tribal council staff provides Tanana Chiefs Conference with readily available feedback as to the application process and any problems that might develop in the delivery of services. The participation of locally-based tribal staff allows Tanana Chiefs Conference to correct errors expeditiously and to effectively respond to reports of fraud.</p> | N/A | N/A | Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients. |

PROCEDURES FOR UNREGULATED ENERGY VENDORS

| Describe the Tribe'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 |
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| <p><i>The legal and binding contracts (found in Attachment B of TCC's LIHEAP plan are required for all program vendors. The contract requires vendors to provide receipt (signed by the recipient) indicating the quantity of all fuels delivered.</i></p> <p><i>TCC also maintains a toll free 1 800 Hot Line for the public to report vendor fraud.</i></p> | N/A | N/A | <p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p> |

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

| Describe Tribe 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 |
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| <p><i>All private business vendors are required to have a current, state of Alaska business license.</i></p> | <p>All private business vendors will be required to provide documentation of their current, state of Alaska business license as an attachment to their vendor contract.</p> | N/A | <p><i>An effective process that effectively confirms the existence of entities receiving federal funds.</i></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 regiment 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> |
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| <p>N/A</p> | <p>N/A</p> | <p>By no later than December 31, 2010, the TCC Client Development Director will develop an anti-fraud training and technical assistance plan to include (a) training for employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors.</p> <p>The plan will become operational January 1, 2011 and be submitted to the Division of Energy Assistance/Office of Community Services/u.S. Department of Health and Human Services as an addendum to the FY 2011 LIHEAP plan.</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>Accounting: The Tanana Chiefs Conference has an automated accounting system. The accounting format utilized by Tanana Chiefs Conference has been approved by State and federal auditors as meeting all criteria to comply with State and federal grants and contract reporting requirements.</i></p> <p><i>b) Monitoring: The TCC automated accounting system and program reports also allows the LIHEAP to be monitored regularly for accuracy. The Tanana Chiefs Conference staff will make every effort to see that the program is delivered in compliance within the regulations of LIHEAP by conducting monthly random samples of applications paid and testing them for accuracy and compliance.</i></p> <p><i>c) Audit: An independent audit is a standard procedure of Tanana Chiefs Conference accounting system. As part of the audit, a random sample of applications from the households served will be reviewed to assure eligibility and proper payment dispersal.</i></p> <p><i>The use and involvement of local tribal council staff provides Tanana Chiefs Conference with readily available feedback as to the application process and any problems that might develop in the delivery of services. The participation of locally-based tribal staff allows Tanana Chiefs Conference to correct errors expeditiously and to effectively respond to reports of fraud. The Tanana Chiefs Conference L.I.H.E.A.P. is audited annually for fiscal and program compliance.</i></p> | | | <p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p> |