



Administration for Children and Families

Office of Community Services
Division of Energy Assistance

Developing Tribal LIHEAP Programs

Guidance for New Coordinators

June 12, 2012

NEUAC Session 4F



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Objectives

- General announcements
- Web Resources
- Understanding Key Rules:
 - Administrative Costs
 - Carryover Report
 - Payment Matrix
 - Program Integrity



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General Announcements



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Background

- ACF administers the Low Income Home Energy Assistance Program (LIHEAP) at the Federal level
- ACF funds a total of more than 200 LIHEAP grantees which include State, Tribes and Tribal Organizations, and U.S. Territories
 - Of this, approximately 150 LIHEAP grantees are Tribes
- LIHEAP is funded on an annual basis. Congress issues funding to ACF after October 1st. The timing and amount of funding varies each year.
- Funding is made available upon receipt of a complete LIHEAP Plan each year. LIHEAP Plans are due to ACF no later than **September 1**.
- Plans should be submitted by email to: LIHEAPsubmissions@acf.hhs.gov
- Reports for the prior year must be received to receive funding the next year. These include the Carryover and Reallotment Report and the Household Report.



General Reminders

- **Tribal Contacts:** Notify ACF as soon as possible if your Tribal LIHEAP coordinator changes. We need their full contact information to follow-up about funding and other issues.
- **Extensions:** Meet due dates when applying for funds and submitting reports. If you think you can't, request an extension in writing to ACF and your State before the deadline.
- **One-on-one ACF Assistance:** [Contact your ACF liaison](#) for technical assistance.
- **ACF Guidance:** Check the LIHEAP website often for new guidance, forms, and announcements (especially AT's, IM's, and Dear Colleague Letters). We also send these by email to the LIHEAP coordinator.
- **Resources:** Download copies of the LIHEAP Tribal Manual and the LIHEAP statute and regulations from the LIHEAP website.



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Web Resources



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LIHEAP Web Site

Includes Information Memoranda (IMs), and Action Transmittals (ATs), the statute, regulations, ACF contacts, forms, and program information:

<http://www.acf.hhs.gov/programs/ocs/liheap/index.html>

The screenshot shows a web browser window displaying the LIHEAP website. The browser's address bar shows the URL <http://www.acf.hhs.gov/programs/ocs/liheap/index.html>. The website header includes the Administration for Children and Families logo and navigation links such as "ACF Home", "Services", "Working with ACF", "Policy/Planning", "About ACF", "ACF News", and "HHS Home". The main content area is titled "Low Income Home Energy Assistance Program (LIHEAP)" and is organized into several columns:

- About LIHEAP:** Includes links for "Fact Sheet" and "Contact Us".
- Funding:** Includes links for "Total", "Block Grant", and "Emergency Contingency".
- Publications and Reports:** Includes links for "LIHEAP Targeting Performance Measurement Statistics: GPRA Validation of Estimation Procedures", "Congressional Reports", "Home Energy Notebook", "Studies and Evaluations", and "Program Statistics".
- Applying for Assistance:** Includes links for "How To Apply Brochure (359kb PDF)", "Come Apply! Folleto (359kb PDF)", and "Agency Contacts".
- Guidance, Policies, and Procedures:** Includes links for "Action Transmittals", "Information Memoranda", "Dear Colleague Letters", "Eligibility Criteria", "Statute and Regulations", "Grantee Deadlines", "Forms", "Special Topics", "Tribal Manual", and "LIHEAP Requirements (628KB - PDF)".
- Related ACF Links:** Includes links for "ACF Grant Opportunities" and "Working with ACF".

On the right side of the page, there is a "LIHEAP" logo and a "What's New" section listing recent updates, including "IM-2012-06" and "FR Notice of the Federal Fiscal Year (FFY) 2013 State Median Income Estimates". Below this is an "ACF FRAUD ALERT HOTLINE" section with the phone number 1 (888) 289-8442 and instructions on how to report fraud.



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LIHEAP Clearinghouse

LIHEAP Clearinghouse website collects, develops, organizes and disseminates information on low-income home energy issues (including Tribe's LIHEAP Plans): <http://liheap.ncat.org/>

The screenshot shows a Windows Internet Explorer browser window displaying the LIHEAP Clearinghouse website. The browser's address bar shows the URL <http://liheap.ncat.org/>. The website header includes the U.S. Department of Health and Human Services logo and the text "Administration for Children & Families". The main heading is "LIHEAP CLEARINGHOUSE". Below the heading is a navigation menu with links for Home, Contact Us, Who We Are, Newsletter, Text Only, and State Snapshots. A search bar is located on the left side. The main content area features a "Low-Income Energy News" section with a prominent article titled "Energy Outreach Colorado Provides \$1.17 Million for Energy Assistance". A sidebar on the left lists various categories such as "LIHEAP Referrals", "State Programs", "Tribal LIHEAP", "LIHEAP Funding", "Public Benefits", "Disconnect Policies", "State Supplements", "LIHEAP Directors", "Publications", and "Related Links". The bottom of the browser window shows the Windows taskbar with the start button, several open applications (Microsoft Office, Internet Explorer), and the system clock displaying 9:08 PM.



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Administrative Costs

Definition, Cap Maximum and Percentage Calculations



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Administrative Costs Definition

- All LIHEAP grantees are required to develop their own definition of “administrative costs” and must track these costs throughout the year.
- Your Tribe must also have a definition for what is an “obligation” and an “expenditure”. The LIHEAP statute requires that 90% of LIHEAP funds be obligated within the Federal Fiscal Year (FFY) in which the LIHEAP award is made by ACF and the remaining 10% be obligated by the following FFY.
- Ideally, these should be written in your Tribe’s own policy and procedures manual for LIHEAP.
- You may choose to adopt a definition of administrative costs based on a definition from a similar public assistance program, such as TANF
- See Section I of the ACF LIHEAP Tribal Manual for more information



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Administrative Costs Cap Maximums

- Tribes/Territories with allotments over \$20,000 can use \$4,000, plus 10% of the total LIHEAP funds payable after subtracting the first \$20,000 of LIHEAP funds
- Tribes/Territories with allotments of \$20,000 or less can use 20% of total LIHEAP funds payable
- “Funds payable” includes: regular LIHEAP allocation, supplemental or contingency funds, leveraging incentive award funds and reallotment funds. Funds payable does not include carryover funds from the prior year.
- Leveraging funds must not be obligated or expended for administrative costs.
- If planning and administrative costs exceed the allowable amount, non-Federal funds must be used to pay the excess



Calculating the Administrative Costs Cap Maximum

EXAMPLE

Total LIHEAP allotment of \$100,000

- First \$4,000 \$4,000
- Remaining allotment = \$80,000
 $\$100,000 - \$20,000$
- 10% of remaining allotment \$80,000 is: \$8,000
 $0.10 * \$80,000 = \$8,000$

Total administrative cost cap = \$12,000



Calculating the Percentage of Funds for Administrative Costs

EXAMPLE

Ask: What percentage of the total LIHEAP allotment is the administrative cost maximum?

Administrative Cost Max		Total Allotment		
\$12,000	÷	\$100,000	=	0.12

Administrative Cost Percentage = 12%

$$0.12 * 100 = 12\%$$



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Administrative Costs Plan Reporting

2605(c)(1)(C) → Please estimate what amount of available LIHEAP funds will be used for each component that you will operate: **The total of all percentages must add up to 100%.**

(use of funds)

_____ % heating assistance

_____ % cooling assistance

_____ % crisis assistance

2605(k)(1)

_____ % weatherization assistance

_____ % carryover to the following fiscal year

2605(b)(9)

12% % administrative and planning costs

2605(b)(16)

_____ % services to reduce home energy needs including needs assessment (assurance 16)

_____ % used to develop and implement leveraging activities (limited to the greater of 0.08% or \$35,000 for States, the greater of 2% or \$100 for territories, tribes and tribal organizations).

_____ **TOTAL**



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Administrative Costs Questions

Consult Section I of the LIHEAP Tribal Manual at:

<http://www.liheap.ncat.org/Tribes/manual.htm>

ACF Presenter:

Ms. Lauren Christopher

Lauren.Christopher@acf.hhs.gov

202-401-4870



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Carryover and Reallotment Funds

Policy and Reporting



Carryover Policy

- Policy
 - 90% of funds allotted must be obligated within the same federal fiscal year
 - 10% of funds can be carried over into the next federal fiscal year
- Federal Fiscal Year (FFY) means October 1 – September 30
- FFY 2012 is October 1, 2011 through September 30, 2012
- LIHEAP Carryover and Reallotment Report due to ACF by **August 1st** by email to: LIHEAPsubmissions@acf.hhs.gov

Carryover and Reallotment Report for FY 2012

Due August 1, 2012

Grantee _____ Date _____

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) \$ _____

2) 10 percent of amount payable \$ _____

3) Projected unobligated balance \$ _____

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report \$0 funds for reallotment.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallotment amount below.

Carryover amount \$ _____
(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount \$ _____
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Signature and Title

Telephone Number



Carryover Policy

EXAMPLE

- XYZ Tribe was allotted \$150,000 on Nov. 15, 2011
 - Nov. 15, 2011 is in FFY 2012
 - FFY 2012 ends on September 30, 2012
- XYZ Tribe must obligate **90%** of its total allotment by the end of FFY 2012:
 - **Multiply 0.90** by \$150,000 (total funding) = \$135,000
 - This amount (\$135,000) must be obligated by **September 30, 2012**
- XYZ Tribe can carry over up to **10%** of its allotment for use in FFY 2013
 - **Multiply 0.10** by \$150,000 (total funding) = \$ 15,000
 - This amount (\$15,000) must be obligated by **September 30, 2013**



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Carryover Report

There are four steps to completing the annual LIHEAP Carryover and Reallotment Report. A response on each line of the report is required. The following slides show an example of how to complete the report :

Step 1: Add up all LIHEAP funds received in FFY 2012

EXAMPLE

Regular block grant funds	----->	\$100,000
Leveraging funds	----->	\$7,000
Emergency/contingency funds	----->	\$5,000
Oil overcharge funds	----->	\$0
Reallotment funds	----->	+ \$1,200
		<hr/>
		\$113,200

Carryover and Reallotment Report for FY 2012

Due August 1, 2012

Grantee XYZ Tribe Date July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds)

\$ \$113,200

List amount from Step 1 calculation on line 1 of Carryover Report here

2) 10 percent of amount payable

\$ _____

3) Projected unobligated balance

\$ _____

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report \$0 funds for reallotment.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallotment amount below.

Carryover amount

\$ _____

(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount

\$ _____

(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Signature and Title

Telephone Number



Carryover Report

**Step 2: Multiple 10% by the total LIHEAP funds received in FFY 2012
from step 1**

EXAMPLE $\$113,200 \times 0.10 = \$11,320$

Carryover and Reallotment Report for FY 2012


Due August 1, 2012

Grantee XYZ Tribe Date July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds)	\$ <u>\$113,200</u>
2) 10 percent of amount payable	\$ <u>\$11,320</u>
3) Projected unobligated balance	\$ _____

List amount from Step 2 calculation on line 2 of Carryover Report here



If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report \$0 funds for reallotment.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallotment amount below.

Carryover amount \$ _____
(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount \$ _____
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

- a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted
- b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Signature and Title

Telephone Number



Carryover Report

Step 3: Estimate unobligated balance of FFY 2012 LIHEAP funding that will not be committed for some LIHEAP purpose by September 30, 2012

EXAMPLE Let's say \$12,000

Note:

It is helpful to have a spreadsheet (Microsoft Excel) to track the planned/estimated budget compared to commitments of funds and actual expenditures. It is important to update the budget regularly.

Carryover and Reallotment Report for FY 2012

Due August 1, 2012

Grantee XYZ Tribe Date July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) \$ \$113,200

2) 10 percent of amount payable \$ \$11,320

3) Projected unobligated balance \$ \$12,000

List amount from Step 3 calculation on line 3 of Carryover Report here

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report \$0 funds for reallotment.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallotment amount below.

Carryover amount \$ _____

(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount \$ _____

(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Signature and Title

Telephone Number



Carryover Report

Step 4: Ask yourself, “Which amount is less?”, and subtract

A: Projected unobligated funds (step 3)

-----> \$12,000

OR

B: 10% of total funds received (step 2)

-----> \$11,320

reallotment = \$680

EXAMPLE

If **A** is less than B, then your Tribe can carryover the amount for A

If **B** is less than A, then the amount B is what your Tribe must report as available for reallotment by ACF

In this example, the Tribe has \$680 reallotment and \$0 in carryover (you cannot have both)

Note: Reallotment funds must not be used by grantees after the FFY expires.

Carryover and Reallotment Report for FY 2012

Due August 1, 2012

Grantee XYZ Tribe Date July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) \$ \$113,200

2) 10 percent of amount payable \$ \$11,320

3) Projected unobligated balance \$ \$12,000

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report \$0 funds for reallotment.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallotment amount below.

Carryover amount \$ \$0
(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount \$ \$680
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Jane Doe, LIHEAP Coordinator

Signature and Title

(123) 555-1212

Telephone Number

As our example had a reallotment, enter \$0 on the carryover line.

List amount from Step 4 calculation on the appropriate line here, in this case the reallotment line.

Lastly, sign the report



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Carryover and Reallocation Questions

Consult Section J of the LIHEAP Tribal Manual:

<http://www.liheap.ncat.org/Tribes/manual.htm>

ACF Presenter:

Ms. Margarita Valladares

Margarita.Valladares@acf.hhs.gov

202-205-4711



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Creating a Payment Matrix to Determine Benefit Levels



Why Distinguish Levels of Benefits?

- Section 2605(b)(5) of the LIHEAP Statute (42 U.S.C. § 8624(b)(5)) requires that the highest level of assistance go to:
 - Households which have the lowest incomes.

AND

 - Households with the highest energy costs or needs.



Three Required Variables to Determine Benefit Level

1. Household Income
2. Household Size
3. Energy Cost or Need



Determining Lowest Income

- Vary benefit based on percentage of:
 - Federal Poverty Guidelines (FPG)

OR

 - State Median Income (SMI)

Note: HHS publishes the FPG's each year through an IM on the LIHEAP web site. Grantees must use the most currently available FPG's at the time of submitting their LIHEAP Plans (45 C.F.R. § 96.85).



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2012 Federal Poverty Guidelines

Household Size	Poverty guideline
1	\$11,170
2	15,130
3	19,090
4	23,050
5	27,010
6	30,970
7	34,930
8	38,890



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Sample Calculations

HH Size = 4

FPG = \$23,050

% of FPG	Calculation	Maximum Annual Income
Up to 25%	$0.25 \times \$23,050$	\$5,763
26% - 50%	$0.50 \times \$23,050$	\$11,525
51% - 100%	$1.00 \times \$23,050$	\$23,050
101% - 125%	$1.25 \times \$23,050$	\$28,813
126% - 150%	$1.50 \times \$23,050$	\$34,575



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Determining Energy Cost or Need

- Fuel Type
- Individual Bill Amount
- Energy Burden
- Climate or Region
- Dwelling Type
- Household Need
(specific to situation)



Considerations for Varying Benefits Based on Fuel Type

- Determine cost of fuels and rank fuel types, most to least expensive.
- Highest benefit should go to households using most expensive fuel type as primary source of heating.
- For each fuel type, vary benefit based on level of income.



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Sample Benefits Matrix Based on Fuel Type

Household Size:								Poverty Level	FO, Kero		Natural	
1	2	3	4	5	6	7	8		Propane	Electric	Gas	Others
\$2,707.50	\$3,642.50	\$4,577.50	\$5,512.50	\$6,447.50	\$7,382.50	\$8,317.50	\$9,252.50	Up to 25%	\$750	\$600	\$550	\$510
\$5,415.00	\$7,285.00	\$9,155.00	\$11,025.00	\$12,895.00	\$14,765.00	\$16,635.00	\$18,505.00	Over 25% to 50%	\$725	\$570	\$525	\$480
\$8,122.50	\$10,927.50	\$13,732.50	\$16,537.50	\$19,342.50	\$22,147.50	\$24,952.50	\$27,757.50	Over 50% to 75%	\$700	\$550	\$500	\$450
\$10,830.00	\$14,570.00	\$18,310.00	\$22,050.00	\$25,790.00	\$29,530.00	\$33,270.00	\$37,010.00	Over 75% to 100%	\$680	\$520	\$480	\$420
\$13,537.50	\$18,212.50	\$22,887.50	\$27,562.50	\$32,237.50	\$36,912.50	\$41,587.50	\$46,262.50	Over 100% to 125%	\$650	\$500	\$430	\$390
\$16,245.00	\$21,855.00	\$27,465.00	\$33,075.00	\$38,685.00	\$44,295.00	\$49,905.00	\$55,515.00	Over 125% to 150%	\$630	\$480	\$400	\$360
\$18,952.50	\$25,497.50	\$32,042.50	\$38,587.50	\$45,132.50	\$51,677.50	\$58,222.50	\$64,767.50	Over 150% to 175%	\$620	\$450	\$370	\$330
\$21,660.00	\$29,140.00	\$36,620.00	\$44,100.00	\$51,580.00	\$59,060.00	\$66,540.00	\$74,020.00	Over 175% to 200%	\$610	\$425	\$330	\$300



Considerations for Varying Benefits Based on Energy Burden

- **Energy Burden =**
current energy cost / total monthly income
- **Decision Point:**
include or exclude any low-income rate discounts
in total cost of energy bill?



Sample Benefits Matrix Based on Energy Burden

Energy Burden	HH Size (1-3)	HH Size (4 or more)
24.5% & higher	\$450	\$500
18%- 24.4%	\$350	\$400
10% - 17.9%	\$250	\$300
9.9% or less	\$150	\$200
24.5% & higher	\$450	\$500



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Payment Matrix Questions

Consult Section D of the LIHEAP Tribal Manual:

<http://www.liheap.ncat.org/Tribes/manual.htm>

ACF Presenter:

Ms. Yuliya Rzad

Yuliya.Rzad@acf.hhs.gov

202-401-9228



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Program Integrity



Program Integrity Activities

- Preventing Waste, Fraud, and Abuse
 - Preventing improper benefits through:
 - Verification of Identity
 - Collecting and verifying Social Security Numbers (SSNs)
 - Requiring proof of identity from all household members
 - Verification of Income
 - Documentation requirements
 - Verification through existing databases



Program Integrity Activities

- Preventing Waste, Fraud, and Abuse
 - Preventing improper payments to vendors through:
 - Verifying the authenticity of vendors
 - Taxpayer Identification Number (TIN)/Employer Identification Number (EIN)
 - State registration/business licensing
 - Systems and accounting practices to prevent duplicate or incorrect payments
 - Preventing fraud by LIHEAP staff through:
 - Training
 - Review of files and payments
 - Separation of duties



Program Integrity Assessment

- Electronic submission due: September 1 (required for funding)
- Make PIA available for public comment in the same manner as the plan
- Resources:
 - [LIHEAP-IM-2012-05](#) – Updated form and clarifying instructions for FY 2013
 - [LIHEAP-AT-2010-06](#) – Introducing new PIA requirement



Program Integrity Assessment

- For overlapping questions, referring to a previous answer within the PIA is permissible (but do not refer to pages in your plan)
- Be specific and as detailed as possible
- Complete all boxes/areas and address activities done in FY 2012 and planned changes for FY 2013
- Distinguish:
 - *documentation versus verification* procedures
 - *required versus requested* information
 - *applicant versus all household members* requirements

SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE

Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT: HHS is requiring further detail from Grantees on their FY2013 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2013 plan which represent improvements or changes to the Grantees' FY2013 plan for preventing and detecting fraud, abuse and improper payment prevention.

Instructions: Please provide full descriptions of the Grantee's plans and strategy for each area, and attach/reference excerpts from relevant policy documents for each question/column. Responses must explicitly explain whether any changes are planned for the new FY.

State, Tribe or Territory (and grant official):			Date/Fiscal Year:
RECENT AUDIT FINDINGS			
<p>Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2013 or the prior three years, in annual audits, Grantee 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 FY2013.</p>	<p>If there is no plan in place, please explain why not.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>Answer or say "None" or "N/A"</p>	<p>Answer or say "None" or "N/A"</p>	<p>Answer or say "None" or "N/A"</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>



Required Program Integrity Responses

- 13 areas including:
 - Audit findings
 - Compliance monitoring
 - Fraud reporting
 - Verifying applicant identities
 - Social security number requests
 - Cross-checking social security numbers against government systems
 - Verifying applicant income
 - Privacy protection and confidentiality
 - Benefits policy
 - Procedures for unregulated energy vendors
 - Verifying authenticity of energy vendors
 - Training and technical assistance



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Program Integrity Questions

Consult LIHEAP Information Memorandum LIHEAP-IM-2012-05:
http://www.acf.hhs.gov/programs/ocs/liheap/guidance/information_memoranda/im12-05.htm

ACF Presenter:

Mr. Matthew Orlovick

Matthew.Orlovick@acf.hhs.gov

202-260-5329



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Questions and Comments