ATTACHMENT 1
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.*

Mississippi Department of Human Services, Division of Community Services FY2013	MDHS/DCS is requiring further detail from Subgrantee Agencies on their FY2013 plans for preventing and detecting fraud, waste and improper payments. MDHS/DCS is also requiring that agencies highlight and describe all elements of the FY2013 plan which represent improvements or changes to the agency's FY2012 plan for preventing and detecting fraud, abuse and improper payment prevention.	Date/Fiscal Year:

RECENT AUDIT FINDINGS

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.	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.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
There are no audit findings or reportable conditions in any category	N/A	N/A	The timely and comprehensive resolution of weaknesses or reportable conditions as revealed by the audit

According to the Paperwork Reduction Act of 1995 (Pub. L. 104-13), public reporting burden for this collection of information is estimated to average 1 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

COMPLIANCE MONITORING			
Describe the Grantee's FY 2012 strategies that will continue in FY 2013 for monitoring compliance with State and Federal LIHEAP policies and procedures by the Grantee and local administering agencies.	Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY 2013.	If you don't have a firm compliance monitoring system in place for FY 2012, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
The State of MS utilizes an established monitoring system which is conducted in accordance to the Single Audit Act and OMB Circulars to ensure all subgrants are administered in compliance with the federal requirements and with the terms of the subgrant agreement. The reviews are formal in nature and are normally preceded by written notification to the subgrantee and to the funding division. On-site entrance and exit conferences are conducted with subgrantees officials and a written report is issued communicating the results of the review to the agency and the funding division (DCS). The multi-level system includes annual onsite review of financial management, program compliance and Virtual ROMA processing. DCS will conduct quality control reviews as a check and balance system to ensure compliance. If there are findings at the local agencies, technical assistance and training is provided.	MDHS/DCS will conduct quarterly desk audits using Virtual ROMA and annual onsite site visits.	N/A	A sound methodology and a more effective monitoring to gather information

FRAUD REPORTING MECHANISMS

For FY 2012 activities continuing in FY 2013, 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 FY 2013, 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
The Department has a fraud hotline and all divisions have 1-800 numbers which are made available to the public, brochures, county offices and the DHS website. Matters brought to the attention of the department may be referred to the Division of Program Integrity for review and investigations.	N/A	N/A	Clear lines of communication for clients and employees to use in reporting suspected fraud or improper payments to State Administrators.

VERIFYING APPLICANT IDENTITIES

Describe all FY 2012 Grantee policies continuing in FY2013 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 FY 2013.	If you don't have a system in place for verifying applicant's identities, please explain why and how the Grantee is ensuring that only authentic and eligible applicants are receiving benefits.	Necessary outcomes from these systems and strategies
Applicants must submit a Social Security card and birth certificate of all household members and a photo I.D. of the applicant.	MDHS is currently working on agreement with the State Department of Health, the Social Security Administration and the State Department of Corrections to further verify information. The department will establish a workgroup of other state agencies to help access information relative to client identities.	N/A	N/A

SOCIAL SECURITY NUMBER REQUESTS

Describe the Grantee's FY 2013 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 FY2013, or remaining the same.	If the Grantee 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
The Department currently requires Social Security numbers to verify eligibility of applicants and household members applying for LIHEAP benefits.	The Department's policy for requiring social security numbers will remain in effect for FY 2013. The department is working on an agreement with the Social Security Administration to verify information.	N/A	All valid household members are reported for correct benefit determination

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

Describe if and how the Grantee used existing government systems and databases to verify applicant or household member identities in FY 2012 and continuing in FY 2013. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)	Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2013.	If the Grantee won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the Grantee will supplement this fraud prevention strategy.	Necessary outcomes from these systems and strategies
The department does not currently use existing government systems and data bases to verify applicant and household member's identity. However, we require applicants to submit social security cards and birth certificates of all household members.	The department is working on an agreement with the Social Security Administration to cross check numbers against its database.	N/A	Use of all available database systems to make a sound eligibility determination

VERIFYING APPLICANT INCOME

Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 2012 and continuing in FY 2013.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2013.	If the Grantee won't be using new hire directories to verify applicant and household member incomes how will the Grantee be verifying the that information?	Necessary outcomes from these systems and strategies

The department does not currently use state directories of new hires or similar systems to confirm income eligibility. All applicants are required to submit verification of income such as check stubs, award letters, bank statements, statements from employer.	The department is currently working on an agreement with MS Employment Security Commission to verify new hires and the IRS to verify income.	N/A	Effective income verification determination

PRIVACY-PROTECTION AND CONFIDENTIALITY

Describe the financial and operating controls in place in FY 2012 that will continue in FY 2013 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 FY 2013.	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
The department requires that subgrantees have in place a financial management system and a policies and procedures manual which contains adequate internal controls for the administration of the program. Each system has designated users who are given access to software. All documentation is kept under lock and key with designated personnel having access. Each subgrantee is required to carry liability insurance to cover staff and adhere to HIPPA.	Virtual ROMA has confidentiality statements signed by all users.	N/A	Clear and secure methods that maintain confidentiality and safeguard the private information of applicants

LIHEAP BENEFITS POLICY

Describe FY 2012 Grantee policies continuing in FY 2013 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 FY 2013.	If the Grantee 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 Grantee taking to ensure program integrity.	Necessary outcomes from these systems and strategies

LIHEAP payments are made to energy vendors not clients. Clients must submit a valid energy bill when applying for assistance. Federal laws require LIHEAP subgrantees to have vendor agreements in place.	All payments are made through Virtual ROMA. Agencies use vendor portals to ensure accounts are valid and that payments are not being duplicated.	N/A	Authorized energy vendors receive payments on behalf of eligible LIHEAP clients

PROCEDURES FOR UNREGULATED ENERGY VENDORS

Describe the Grantee's FY 2012 procedures continuing in FY 2013 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.	Please highlight any strategies policy in this area which will be newly implemented in FY 2013.	If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the Grantee is ensuring program integrity.	Necessary outcomes from these systems and strategies
All LIHEAP subgrantees have vendor agreements in place with energy vendors. All vendors are currently in Virtual ROMA.	The department requires subgrants to recertify the eligibility of energy vendors. All new vendors must have documentation and be approved by the local and state agency before their input into Virtual ROMA and be able to conduct business.	N/A	Eliminate improper payments to unregulated energy utilities.

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

Describe Grantee FY 2012 policies continuing in FY 2013 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of the Grantee's procedure for averting fraud.	Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY 2013.	If you don't have a system in place for verifying vendor authenticity, please describe how the Grantee can ensure that funds are being distributed through valid intermediaries?	Necessary outcomes from these systems and strategies
All LIHEAP subgrantees have vendor agreements in place with energy vendors. All vendors are currently in Virtual ROMA.	The department requires subgrants to recertify the eligibility of energy vendors. All new vendors must have documentation and be approved by the local and state agency before their input into Virtual ROMA and be able to conduct business.	N/A	Only energy vendors with valid agreement in place will receive LIHEAP payments for authorized clients.

TRAINING AND TECHNICAL ASSISTANCE

In regards to fraud prevention, please describe elements of your FY 2012 plan continuing in FY 2013 for training and providing technical assistance to (a) employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors.	Please highlight specific elements of your training regiment and technical assistance resources from your plan which will represent newly implemented in FY 2013.	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.	Necessary outcomes from these systems and strategies
The department provides training and technical assistance to employees, subgrantee staff, clients and energy vendor annually. Further the department provides training and technical assistance at the DCS Implementation Workshop.	The training and technical assistance plan will be adjusted to meet specific needs and provide hands on training to subgrantee staff on Virtual ROMA.	N/A	Reduce the probability of fraudulent occurrences.

AUDITS OF LOCAL ADMINISTERING AGENCIES

Please describe the annual audit requirements in place for local administering agencies in FY 2012 that will continue into FY 2013.	Please describe new policies or strategies to be implemented in FY 2013.	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.	Necessary outcomes from these systems and strategies
Subgrantees are required to follow a procurement process for soliciting an independent auditor. A notice of selection is sent to the department. The department requires subgrantees that exceed $500,000 in expenditures to follow the Single Audit Act Amendments of 1996 and submit the audit report within 6 months after the end of the subgrantees fiscal year. The Division of Program Integrity and Community Services (funding division) review the audit report and ensure resolution of audit findings and monitor the success of corrective action taken.	N/A	N/A	Subgrantees adhere to Federal, State and local audit policies and procedures.