

ATTACHMENT 5

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' FY2012 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): Pennsylvania			Date/Fiscal Year: FY 2013
RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2012 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
<i>Finding: LIHEAP Monitoring Process should be enhanced</i>	<i>Beginning with the 2010-2011 LIHEAP season CAO staff involved with LIHEAP eligibility decisions participated in weekly Knowledge Reinforcement Sessions (KRS). Each KRS was 30 minutes in length. Based on the information from the KRS both Headquarters staff and CAO Supervisors are able to identify areas where further clarification and training are needed. Additionally, beginning with the 2010-2011 LIHEAP season, DPW implemented a new Supervisory review database. The information collected in this database was used throughout the LIHEAP season to identify problems the staff had in implementing policy or use of the e-CIS LIHEAP system. Once identified, problem areas were brought to the attention of all staff and proper guidance was provided.</i> <i>Starting with the 2008-2009 LIHEAP season and continuing, the OIM Bureau of Program Evaluation (BPE) took responsibility for</i>	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

coordinating the monitoring process. An OIM Monitoring team of six reviewers (with members from the Bureaus of Operations, Program Evaluation and Policy) were employed and trained to monitor the LIHEAP program. In addition, the monitoring team is assisted by staff from a forensic accounting firm. Staff from this agency continues to conduct the annual monitoring of county offices in Philadelphia and Allegheny and all of the Crisis Contractors. The remaining county offices are reviewed at least once every three years. During the 2010-2011 LIHEAP Season, the monitoring team was made up of staff from BPE and the forensic accounting staff. Starting with 2009-2010 LIHEAP season and continuing, unscheduled monitoring visits of a county office or Crisis Contractor are used as an investigative measure if information is received that suggests the possibility of misuse, misrepresentation, or any abuse.

2008-2009 Audit

Finding 1: *Internal Control Deficiencies in DPW's Administration of LIHEAP Cash and Crisis Benefits*

**2008-2009 Audit Finding 1
Corrective Action Plan**

Effective September 8, 2009, DPW integrated the LIHEAP Information System (LIS) into the same benefit system used for other public benefits. This new system provides greater detail and accuracy concerning client information and benefit calculations.

DPW conducted two-day policy and systems trainings with workers for the processing of LIHEAP applications before the start of the 2009-10 season. A newly released LIHEAP User Manual was also provided to ensure consistency in application processing. Online e-learning modules for LIHEAP were made available on the Department's intranet to assist in the training of LIHEAP workers. In addition, the LIHEAP Handbook was updated with all policy and procedure changes and weekly calls were conducted by DPW with county offices during the program year to discuss policy and systems issues.

Policy and systems inquiry training for crisis contractors was held on December 16, 2009. Calls between DPW and crisis contractors were held periodically throughout the LIHEAP season. County offices and their Crisis contractors also conducted weekly meetings to review procedures and issues that surfaced. DPW reinforced crisis requirements at policy and systems training, specifically the requirement that crisis applications must be resolved within 48 hours. DPW continued to train crisis contractors on the importance of protecting client privacy and reducing the risk of fraud. Unscheduled visits of county offices and crisis contractors with high error rates were conducted throughout the LIHEAP season.

Finding 2: Noncompliance and Internal Control Deficiencies at DPW Result in Duplicate Payments

DPW implemented the PROMISE system for the 2009-10 LIHEAP season and continued to use the system for the 2010-2011 LIHEAP season. DPW plans to continue the use of the PROMISE system to process LIHEAP vendor payments.. This system allows energy vendors to bill online for crisis deliveries and mail in their documentation.

Payments are not made without receipt of appropriate documentation. All documentation is then scanned and attached to the crisis claim.

**2008-2009 Audit Finding 2
Corrective Action Plan**

Beginning with the 2007-2008 LIHEAP season, applicants' demographic information was vetted against DPW's Master Client Index (MCI), a central repository of client information housed in various DPW eligibility systems. The client information includes such data elements as name, date of birth, social security number, citizenship, etc. If an applicant presented a variation of his/her SSN, and the remaining information such as name and date of birth were the same, the case worker had the opportunity to determine that the clients were the same even though the SSN was slightly different and to take the appropriate action. DPW developed exception reports for the 2009-2010 LIHEAP season, including a report showing slight variations of SSNs to further improve program integrity.

In January 2009, lists of SSNs from the LIHEAP system were sent to SSA for verification and those that could not be enumerated or verified by SSA, were verified manually by county office workers.

Before the start of the 2009-2010 LIHEAP season, the LIHEAP and MCI (Master Client Index) systems were upgraded to send SSN data and demographics to SSA (via data exchange) for verification. An alert is sent to the worker for client follow-up if proper verification has not obtained from SSA. There is a monthly turn around for SSA Enumeration requests. This process was used in the 2010-2011 LIHEAP season and it is expected to be used in future LIHEAP seasons.

ATTACHMENT 5

COMPLIANCE MONITORING			
<p>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.</p>	<p>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY 2013.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>Pennsylvania administers the LIHEAP program through the Department of Public Welfare County Assistance Offices (CAOs) in each of our 67 counties and 6 administering agencies (crisis only). In Fiscal Year (FY) 2012, Pennsylvania will be in the fourth year of a comprehensive monitoring plan that was designed to monitor the activities at each location at least once every three years. However, the two largest counties (Allegheny and Philadelphia) and each administering agency are visited annually. In addition, locations are visited out of cycle if additional monitoring is warranted.</i></p> <p><i>The monitoring at each location involves a team, led by the DPW's Bureau of Program Evaluation ("BPE") which is independent of the LIHEAP program staff, and supplemented by outside experts in forensic accounting, controls and compliance. This team reviews targeted applications for compliance with State and Federal LIHEAP policies. This team also reviews the processes employed at each location. Based on the observations of the monitoring team derived during their visit BPE provides feedback on opportunities for improvement relating to compliance and operations to both the location visited and the LIHEAP headquarters staff. Information from these monitoring sessions are communicated statewide, as necessary, during the LIHEAP application period to assist all locations, regardless of whether they are visited in a particular year or not.</i></p> <p><i>Targeted applications reviewed include, but are not limited to, those with the highest opportunity for worker error or fraud. Indicators include no or minimal reported income, missing social security numbers of household members, possible duplicate applications (based on addresses or other identifying information), and social security numbers for household members who are identified as being deceased. A selection of rejected applications is also reviewed.</i></p> <p><i>In addition to the location visits, in FY 2010 and FY 2011 LIHEAP seasons the BPE monitoring team performed a desk review of a statistical sample of statewide applications (600 each year) to determine a valid statewide accuracy rate. These reviews will serve as a base line going forward to gauge the progress the state continues to make relating to overall accuracy and adherence to LIHEAP policy.</i></p>	<p>N/A</p>	<p>N/A</p>	<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

ATTACHMENT 5

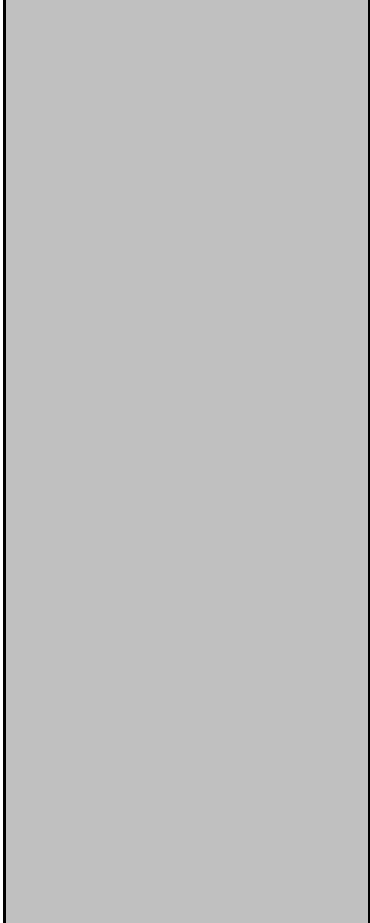
Other Monitoring procedures that were performed included:

- *Vendor reviews – for crisis payments a sampling of vendor receipts were reviewed to ensure that crisis benefits matched either the actual fuel delivered (deliverable fuels) or the appropriate amount necessary to avoid a shut off (regulated utilities)*
- *Direct payment reviews – a specific sample of direct payments to applicants were reviewed to determine adherence to state policy related to direct payments.*

The observations listed below are based on an analysis of the FY 2010 monitoring activities and were incorporated in the FY2011 LIHEAP program:

- *Focused Staff Training*
- *Technology Systems Design and Modification*
- *Targeted Supervisor Reviews*
- *Applicant communications (applications, requests for additional information, rejection notices etc)*

Beginning In FFY 2012, each county will be visited every two years and each large processing center (serving two or more counties) as well as Philadelphia and Allegheny counties will be visited annually.



ATTACHMENT 5

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
<p><i>The Commonwealth of PA has an established process to report fraud in all programs. The Welfare Fraud Tip Line can be used by the public to report suspected client and vendor fraud. The OIM Help Line and the Customer Service Centers also accept reports of suspected program fraud and will refer the report to the CAO of origin for investigation. The contact information for these venues is posted on the Commonwealth of PA Department of Public Welfare website and in the department's offices. DPW's procedures in investigating reported or suspected fraud are detailed in section 601.144 of Pennsylvania's LIHEAP State Plan.</i></p>	N/A	N/A	<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			
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
<p><i>The Commonwealth of PA requires clients to provide proof of heating responsibility for their residence and self declaration of citizenship. In addition, applicants shall provide Social Security Numbers (SSN) for all members of their household (Per LIHEAP-IM-2010-6). SSNs are verified via SSA data exchange. An Energy Assistance Affidavit must be signed for those who do not have or are unable to provide one.</i></p>	N/A	N/A	<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>

ATTACHMENT 5

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
<i>In FY 2011, PA participated in the Income Eligibility Verification System (IEVS), the Social Security Enumeration Verification System and the state records of death and will continue to do so in FY 2012. LIHEAP applications are matched with DPW/OIM's Client Information System (CIS) and the Criminal Justice Information System (CJIS). In addition, applicants shall provide Social Security Number (SSNs) for all members of their household (Per LIHEAP-IM-2010-6). SSNs are verified via SSA data exchange.</i>	Remains the same.	N/A	<i>All valid household members are reported for correct benefit determination.</i>

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 2012.	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
<i>In FY 2011, PA participated in the Income Eligibility Verification System (IEVS), the Social Security Enumeration Verification System and the state records of death and will continue to do so in FY 2012. LIHEAP applications are matched with DPR/OIM's Client Information System (CIS) and the Criminal Justice Information System (CJIS).</i>	N/A	N/A	<i>Use of all available database systems to make sound eligibility determination.</i>

ATTACHMENT 5

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
<i>In FY 2011, PA required applicants to provide documentation of the amounts and sources of income of household members including related roomers, as well as that of anyone in the household who received LIHEAP benefits during the current program year as a member of another household, and will continue to do so in FY 2012. Additionally, PA verified income via the Income Eligibility (IEVS) and PA Dept. of Labor & Industry data files (including new hires). Additionally, PA has contracted with the TALX (Work Number) earned income verification service.</i>	N/A	N/A	<i>Effective income determination achieved through coordination across program lines.</i>

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
<i>Information about a LIHEAP applicant or recipient is confidential and may be disclosed for only: (1) aid in the investigation or prosecution of suspected LIHEAP fraud (2) cooperate with Federal/state authorities regarding LIHEAP audits, reviews & investigations. (3) With approval disclosures to help apply for energy assistance. All applications and supporting documents are to be scanned and imaged into DPW/OIM's electronic record within 30 days and paper applications shredded and destroyed in a secure manner. All electronic files are protected by DPW's Information Technology security systems.</i>	N/A	N/A	<i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i>

ATTACHMENT 5

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
<i>Each vendor is required to sign a vendor agreement. Additionally, each vendor must provide verification from the IRS of their FEIN/SSN for the business to DPW. If an overpayment occurs because of suspected fraud, DPW will refer the overpayment for collection or prosecution to the Office of Inspector General.</i>	N/A	N/A	<i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i>

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
<i>Cash benefits are processed weekly through PA Treasury Dept. and sent by check or electronic funds transfer (EFT) on behalf of the client to enrolled vendors participating in the LIHEAP Program. Vendors must have a signed agreement in placed prior to any payments being made. For Crisis benefits PA has implemented a web-based, real time claims processing system, where the enrolled vendors who have been authorized to make deliveries, enter their claims and send in their trip tickets to a secure website for processing. The vendors can see their authorizations on the site for each delivery and submit claims and back up documentation per authorization. Once the claims have been approved for payment, the payments are sent via paper check or EFT to the vendors. This claims processing system for crisis benefits has allowed for improved program monitoring capabilities and increased efficiency in verifying crisis-delivered services.</i>	N/A	N/A	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>

ATTACHMENT 5

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
<i>Each vendor is required to sign a vendor agreement. Additionally, each vendor must provide verification from the IRS of their FEIN/SSN for the business to DPW. If an overpayment occurs because of suspected fraud. DPW will refer the overpayment for collection or prosecution to the Office of Inspector General.</i>	N/A	N/A	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

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
<i>In an effort to alleviate fraud and abuse in the LIHEAP program, Staff Development trains all CAO personnel on LIHEAP Cash, Crisis and Weatherization programs. This information is disseminated on Staff Development's web page via an e-learning module. In addition, Staff Development provides online training through WebEx and face-to-face training to the LIHEAP Coordinators/Supervisors. They, in turn, conduct the same training face-to-face for all LIHEAP Energy Assistance Workers (EAW), Clerks and Income Maintenance Caseworkers (IMCW). <i>This in depth training stresses the importance of reviewing system information to prevent duplication</i></i>	N/A	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

of benefits for a LIHEAP household. IMCWs are instructed on all verifications needed prior to authorizing benefits such as residency, heating responsibility and income. The Department consistently updates its training curriculum to help ensure that clerical staff and LIHEAP workers understand current data entry procedures.

We strive to prepare the LIHEAP workers to request only verifications necessary for accurate benefit authorization as mandated by the State Plan. We stress the importance of requesting additional information if the client has provided incomplete, unreasonable or information inconsistent with known facts. Additionally, LIHEAP workers are instructed to assist the clients in obtaining verification.

DPW also conducts annual training of contracted agencies who determine eligibility for crisis benefits in certain counties. This training stresses the importance of protecting client privacy and reducing the risk of fraud. Contractors are trained to check the LIHEAP computer system to verify whether a client has already been determined eligible for LIHEAP and the amount of any previous crisis grant.

In addition to the LIHEAP specific training, other training modules have been mandated in the past that also address fraud and abuse. Some examples are: Introduction to IEVS Exchanges which helps caseworkers and EAWs verify reported income; Case Comments stresses the importance of complete and understandable narratives; Office of Inspector General (OIG) Field Investigation Program explains in detail how to make a referral if information received from the client appears to be inconsistent with known facts.

Desk Guides are also provided to the LIHEAP workers to aid them in carrying out their job function. If a problem area is identified, a desk guide is created and published on our web page for easy access by all LIHEAP workers.

DPW also drafted a comprehensive LIHEAP User Manual at the start of the 2009-10 LIHEAP season and updated for the 2010-2011 LIHEAP Season. This manual gives CAOs instructions for handling LIHEAP from the date the application is received until the date the application is filed. All system and procedural information is provided in this manual to ensure consistent processing of LIHEAP applications throughout all counties. Workers receive continued support throughout the LIHEAP season to address any policy questions or system problems they may have.

If an Overpayment occurs because of suspected fraud, client error, or client misrepresentation, DPW will refer the Overpayment for collection or prosecution to the:

*Office of Inspector General,
P.O. Box 8016,
Harrisburg, Pennsylvania 17105-8016,
under Supplemental Handbook Chapter 910*

(relating to overpayment recovery).

If an overpayment occurs because of vendor error, misrepresentation, or fraud, DPW will take progressive steps, if necessary, to seek restitution of the overpayment. In instances where vendor error has caused the overpayment, any calls or notices to the vendor regarding repayment must include a statement that repayment must be made from vendor funds, not client funds. Progressive steps are:

- (1) DPW will notify the vendor of the overpayment by telephone to request repayment within 10 days of the telephone call.*
- (2) If after 10 days of the telephone call, the vendor fails or refuses to repay DPW for the overpayment, DPW will send a written notice to the vendor requesting restitution.*
- (3) If, after 10 days from the date of the written notice, DPW has still not received restitution from the vendor, DPW will send the vendor a notice by certified mail. This notice will inform the vendor that unless restitution is paid within 10 days, DPW will remove the vendor from the list of participating LIHEAP vendors and will refer the overpayment for investigation and collection.*
- (4) If after 10 days from the date of the notice by certified mail, the vendor fails to return the funds, DPW will remove the vendor from the list of participating vendors and refer the overpayment to DPW's Office of General Counsel for investigation and collection.*
- (5) Weekly knowledge reinforcement sessions are completed for all staff working on LIHEAP applications. County supervisors follow-up with units and individual workers on problem areas. DPW headquarters LIHEAP staff follow-up on problem areas with county staff through weekly conference calls.*

ATTACHMENT 5

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
<p><i>Pennsylvania administers the LIHEAP program through the Department of Public Welfare County Assistance Offices (CAOs) in each of our 67 counties and 6 administering agencies (crisis only). In Fiscal Year (FY) 2012, Pennsylvania will be in the fourth year of a comprehensive monitoring plan that was designed to monitor the activities at each location at least once every three years. However, the two largest counties (Allegheny and Philadelphia) and each administering agency are visited annually. In addition, locations are visited out of cycle if additional monitoring is warranted.</i></p> <p><i>The monitoring at each location involves a team, led by the DPW Bureau of Program Evaluation ("BPE") which is independent of the LIHEAP program staff, and supplemented by outside experts in forensic accounting, controls and compliance. This team reviews targeted applications for compliance with State and Federal LIHEAP policies. This team also reviews the processes employed at each location. Based on the observations of the monitoring team derived during their visit BPE provides feedback on opportunities for improvement relating to compliance and operations to both the location visited and the LIHEAP headquarters staff. Information from these monitoring sessions are communicated statewide, as necessary, during the LIHEAP application period to assist all locations, regardless of whether they are visited in a particular year or not.</i></p> <p><i>Targeted applications to review include, but are not limited to, those with the highest opportunity for worker error or fraud. Indicators include no or minimal reported income, missing social security numbers of household members, possible duplicate applications (based on addresses or other identifying information), and social security numbers for household members who are identified as being deceased. A selection of rejected applications is also reviewed.</i></p> <p><i>In addition to the location visits, in FY 2010 and FY 2011 the BPE monitoring team performed a desk review of a statistical sample of statewide applications (600 each year) to determine a valid statewide accuracy rate. These reviews will serve as a base line going forward to gauge the progress the state continues to make relating to overall</i></p>	<p>N/A</p>	<p>PA agrees in accordance with Pub. L. 97-35, Section 2605(e) as amended, to a financial and compliance audit by an independent agent annually, according to the Comptroller General's standards. Within 30 days a copy of the audit will be submitted to the Governor, General Assembly & the DHHS Secretary. The audit is available to the public on a timely basis.</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

ATTACHMENT 5

accuracy and adherence to LIHEAP policy.

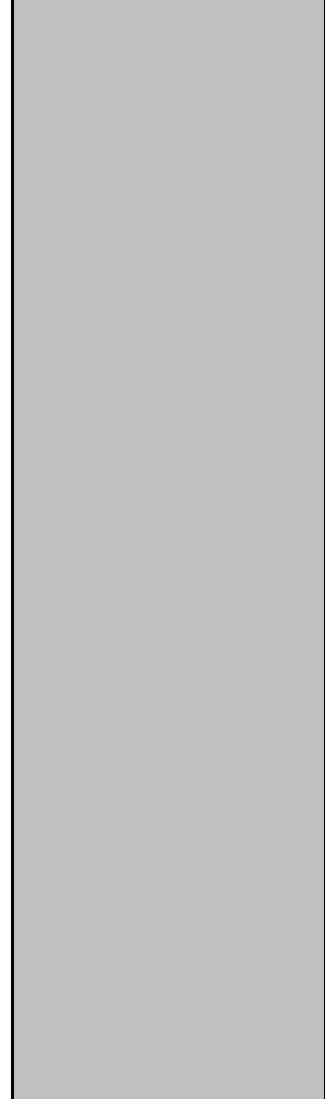
Other Monitoring procedures that were performed included:

- *Vendor reviews – for crisis payments a sampling of vendor receipts were reviewed to ensure that crisis benefits matched either the actual fuel delivered (deliverable fuels) or the appropriate amount necessary to avoid a shut off (regulated utilities)*
- *Direct payment reviews – a specific sample of direct payments to applicants were reviewed to determine adherence to state policy related to direct payments.*

The observations listed below are from an analysis of monitoring activities from FY2010 and were incorporated in the FY2011 LIHEAP program.:

- *Focused Staff Training*
- *Technology Systems Design and Modification*
- *Targeted Supervisor Reviews*
- *Applicant communications (applications, requests for additional information, rejection notices etc.)*

Beginning In FFY 2012, each county will be visited every two years and each large processing center (serving two or more counties) as well as Philadelphia and Allegheny counties will be visited annually



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.