

**FFY' 2014 PROGRAM INTEGRITY PLAN**

<p><b>Delaware</b></p>	<p><b>LIHEAP Program Integrity Assessment Plan</b></p>		<p><b>FFY 2014</b></p>
<p><b>RECENT AUDIT FINDINGS</b></p>			
<p>Delaware received 3 Findings as a result of the SFY12 LIHEAP audit. Finding #1 related to Reporting; Period of Availability of Funds; Finding #2 addressed inconsistencies in the FFY11 Household Report. Finding #3 was about incorrect numbers reported on the SF-425 Reports in 2010 and 2011. These Findings were all carried forward from FY11 into FY12 because the State audit is performed for the State Fiscal Year</p>	<p>Corrective Action Plans have been addressed for each of the 3 Findings. Most of these Findings were carried forward from FY11 and FY12 because the state audits LIHEAP on the State Fiscal Year which runs from July 1 - June 30, therefore, covering two federal fiscal years. Therefore most of these findings have been addressed by the next federal fiscal year but is reported as a finding again because of the overlap. Finding #1 has been addressed and completed. Revised reports were submitted to</p>	<p>N/A</p>	<p>The Corrective Action Plans taken as a result of the three Findings will ensure that Delaware's LIHEAP has positive outcomes for reporting and procurement of goods and services.</p>
<p><b>COMPLIANCE MONITORING</b></p>			
<p>Delaware will perform compliance monitoring in fiscal areas on an annual basis as described in the Delaware Energy Assistance Program (DEAP) Operations Manual. An Administrative Monitoring to gauge the agency's preparedness in administering LIHEAP will also be done on an annual basis. Program monitoring will be performed</p>	<p>Fiscal and Administrative monitoring reports will be completed once per year and any report requiring follow up actions will be tracked. Program reports will be submitted within 30 days (when feasible) of monitoring sub grantees. Follow-up actions will be tracked and recorded when required.</p>	<p>See Section 700 of the DEAP Operations Manual for more details.</p>	<p>Sub grantees will be required to address findings based on compliance monitoring via corrective action plans. In addition, the State will implement new policies and</p>
<p><b>FRAUD REPORTING MECHANISMS</b></p>			
<p>The State of Delaware's Auditor's Office maintains an anonymous Delaware referral site to facilitate the reporting of allegations of Fraud, Waste and Abuse of State government resource. Delaware also have hotline - 1-800-55-FRAUD (1-800-553-7283)</p>	<p>There are no additional plans at this time to enhance fraud reporting mechanisms.</p>	<p>N/A</p>	<p>See Section 1000 on Fraud, Waste and Abuse in the DEAP Operations Manual.</p>

**VERIFYING APPLICANT IDENTITIES**

<p>LIHEAP applicant households are requested to provide picture ID's for all applicant households 18 and over. Inability to produce a picture ID does not result in a denial of LIHEAP assistance. However, these applications must be completed manually because our computer system has no override for persons without an SSN. Birth certificates, school records,</p>	<p>Delaware has no plans in the immediate future to enhance verification of identities of LIHEAP applicants. We have always required documents with hou seholds members social security number for all household members 6 months old or greater. This has not changed in FFY14.</p>	<p>Delaware will continue to research 'Best Practices' to help us determine verification methods that are feasible for us.</p>	<p>Enhanced documentation that LIHEAP eligible households are receiving benefits.</p>
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**SOCIAL SECURITY NUMBER REQUESTS**

<p>Delaware has consistently required that a social security card be made available for every LIHEAP applicant household member aged 6 months or older. Those less than 6 months old must produce a birth certificate. Copies of these documents are kept in the client file. All new applicants must call for an appointment at which time they are told what</p>	<p>This policy is the same as in 2013 and is described in the DEAP Operations Manual.</p>	<p>N/A</p>	<p>Enhanced documentation that LIHEAP eligible households are receiving benefits.</p>
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**CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES**

<p>Delaware does not employ any existing government systems and databases to verify applicant household member identities.</p>	<p>Delaware is researching the cost benefit of such services. In the ongoing development of our policies and procedures, Delaware is leaning towards establishing a policy to check a percentage of ID's in lieu of verifying 100% of SSN's. We will employ an existing government system and/or our own in-state database system.</p>	<p>Delaware will work with other state agencies to cross reference SSN's with state identifiers known as Master Client Identifiers or (MCI) numbers for all LIHEAP applicant households as part of the states' own database known as CAPS.</p>	<p>Cross referencing SSN's with LIHEAP clients and state MCI numbers will enhance the validity of clients submitting SSN's when applying for LIHEAP services.</p>
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**VERIFYING APPLICANT INCOME**

<p>While Delaware requires that applicants provide proof of income in order to determine their eligibility for LIHEAP, the State does not verify income with other state directories.</p>	<p>Delaware is researching the development of a cooperative relationship with the Dept. of Labor Unemployment Insurance agency to match reported income of LIHEAP recipients. Delaware has revised some of its policies on income documentation and plans to continue training sub grantee staff in this area as we enhance our income verification practices.</p>	<p>Delaware will review the report published by the Program Integrity Workgroup for best practices.</p>	<p>Greater confidence in the validity of the reported income when verified with the Dept. of Labor for new hires and unemployment insurance income.</p>
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**PRIVACY-PROTECTION AND CONFIDENTIALITY**

<p>LIHEAP sub grantee staff members sign a confidentiality agreement, including temporary employees that states: "they will not share privileged and client information with any unauthorized person or agency." Workers caught sharing client information outside of reasons approved by the client for a specific reason are subject to immediate termination. Client files are kept in locked file cabinets and access to client</p>	<p>No new policies or procedures are being implemented for 2014; however, Delaware is continually researching best practices for consideration in modifying its own policies and procedures to enhance the privacy and confidentiality of its LIHEAP clients.</p>	<p>N/A</p>	<p>Any enhancement to protect client confidentiality is encouraged and will be reviewed.</p>
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**LIHEAP BENEFITS POLICY**

<p>Delaware's LIHEAP database tracks all clients and households members by SSN to minimize the potential for receiving fraudulent benefits.</p>	<p>Client file monitoring that takes place throughout the year at the sub grantee agencies includes tracking payments to vendors and matching with client benefit amo units to ensure proper payments are being made. Back up documentation submitted by the grantee agency with their invoices also helps to minimize potential fraud in this area.</p>	<p>N/A</p>	<p>Authorized energy vendors are receiving payments on behalf of eligible LIHEAP clients. LIHEAP clients receive a letter with their maximum benefit amount payable to their vendor.</p>
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## PROCEDURES FOR UNREGULATED ENERGY VENDORS

<p>Sub grantee agency staff spot check vendor prices from time to time to ensure that LIHEAP clients are not being charged any differently than non LIHEAP clients. Staff makes blind calls to agencies to track prices. Clients may report potential fraud to sub grantee agencies. Sub grantees inform LIHEAP Administrator who will submit this information to the Division of Weights and Measures which has the responsibility and oversight of monitoring fuel trucks and deliveries.</p>	<p>No new initiatives are being implemented for 2014.</p>	<p>N/A</p>
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## VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

<p>Delaware checks the list of non-regulated vendors that sub grantee contracts with on an annual basis to provide fuel to LIHEAP eligible households. The LIHEAP Administrator goes to the System for Award Management (SAMS) website to verify if the vendor has been placed on the suspended or debarred list for contracts with federal dollars. This helps to maintain the integrity of the vendors participating in LIHEAP.</p>	<p>DSSC staff, LIHEAP staff, and sub grantee staff meet annually with energy vendors both regulated and non-regulated to review the vendor agreement (contract). This affords the State the opportunity to clearly name expectations of the vendors and for the vendors to voice their concerns to the State. This communication leads to better service to LIHEAP households.</p>	<p>N/A</p>
<p>These strategies enable Delaware to be confident that the vendors they are using to provide energy assistance to LIHEAP households are viable business entities and are not barred from providing services in the State of Delaware. This year, we introduced the concept of collecting cost and consumption data from LIHEAP households by the vendor. We expect to eventually use this data to enhance LIHEAP services to eligible household.</p>	<p>N/A</p>	<p>Participating vendors are required to have a current State of Delaware business license and appropriate insurance before they are approved to contract with sub grantee agency. Spot checking for vendors on the federal governments System for Award Management (SAM) to ascertain</p>

### TRAINING AND TECHNICAL ASSISTANCE

<p>LIHEAP staff attend conferences, workshops, and trainings sponsored by HHS, and such agencies at the National Energy Assistance Directors' Association (NEADA) and the National Low-Income Energy Consortium (NIEC), which provide training and technical assistance on LIHEAP issues including fraud prevention as best practices. These workshops, conferences, and training afford LIHEAP staff the opportunity to network with other LIHEAP Administrators and people working in the field of low income energy making it a valuable opportunity to improve LIHEAP services. HHS also provides</p>	<p>The DEAP Operations Manual continues to be updated to enhance procedures as program operations evolve. Policies are sometimes revised and as a result changes are made to the DEAP Operations Manual. Sub grantees are trained/informed annually of DEAP Manual changes. Throughout the year they may be informally told about program and procedure changes. Delaware hopes to take advantage of the Peer-to-Peer Counseling and Training being offered by HHS in 2014 to assist in these areas.</p>	<p>N/A</p>	<p>Timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit. Consistent implementation of LIHEAP policies and procedures statewide.</p>
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### AUDITS OF LOCAL ADMINISTERING AGENCIES

<p>All sub grantees are required to have an A-133 annual audit and present same to Delaware LIHEAP office when available.</p>	<p>LIHEAP Administrator will develop a checklist, with the help of other staff, to review the audits. Special focus will be on any audit findings. Currently there is no written procedure for</p>	<p>N/A</p>	<p>Reduce and strive to eliminate improper payments, maintain sub grantee integrity, and</p>
<p><b>Additional Information</b>                  Please attach further information that describes the Grantee's Program Integrity Policies, including supporting documentation from program manuals, including The DEAP Operations Manual was made available to staff of HHS during the compliance audit in April 2012. Updates have been added since that time and are available by request.</p>			