

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 FY2014 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2014 plan which represent improvements or changes to the Grantees' FY2014 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: July 2013/FY 14	
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 FY2014.	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	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

Attachment – page 1

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 2013 strategies that will continue in FY 2014 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 2014.	If you don't have a firm compliance monitoring system in place for FY 2014, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<p>There is a multi-level monitoring review of sub-recipients. There is a state level on site review each program year for policy and program compliance such as intake procedures, application processing time frames, benefit issuances timeframes, separation of duties, client appeal process. The client application has a second level review before it is processed. Energy Assistance Coordinators at the local agencies perform internal monitoring by reviewing application samples at each intake site. If there are findings at the local agencies, technical assistance and training is immediately provided. If a corrective action plan is required, the agency must submit the plan within 30 days for approval. The state office will monitor the agency's plan and provide technical assistance as needed. Desk reviews, monthly report reviews (expenditure, programmatic) and LIHEAP system reviews are conducted throughout the program to ensure compliance</p>	N/A	N/A	<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>
FRAUD REPORTING MECHANISMS			
For FY 2013 activities continuing in FY 2014, 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 2014, 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>There is a fraud hotline and an 800 information and referral line that is available to the public for reporting instances of suspected fraud.</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 2013 Grantee policies continuing in FY2014 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 2014.	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>Georgia requires all applicants who state they are US citizens or legally admitted aliens to complete and sign an affidavit of citizenship which must be notarized. In addition, the applicant must provide one document from the list of secure and verifiable documents under O.C.G.A 50-36-2 which correlates with the name and status chosen. This policy began in 2012 to strengthen verification of citizenship. See excerpt from Energy Assistance Policy and Procedures Manual: Application Processing Section III-A, Pages 38-46.</p>	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			
Describe the Grantee's FY 2014 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 FY2014, 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
<p>Applicants are required to provide proof of social security numbers for all household members.</p>	<p>This is not a new policy. This policy has been in place since the inception of the program.</p>	N/A	<i>All valid household members are reported for correct benefit determination.</i>

BACKGROUND	Complete, accurate and timely eligibility determination, application processing and benefit payment is crucial to a successful and effective Energy Assistance Program.					
REQUIREMENT	CAA's must accept and complete an application for all persons who request assistance through the energy assistance program. Application approval is based on funds availability.					
BASIC CONSIDERATION	<p>All households have the right to apply for assistance and must be given the opportunity to make an application.</p> <p>Households may apply and receive assistance once for each component during the energy program year.</p> <p>Household Applicants must be seen on a first come first served basis.</p> <p>All household applicants must be seen in a timely manner.</p> <p>Households with Limited English Proficiency persons must have equal access to all benefits and services.</p> <p>Agencies must not take more applications than funding allows.</p>					
BASIC ELIGIBILITY CRITERIA	<ul style="list-style-type: none"> • Households must be at or below 60% of Georgia's median income. • Households must be responsible for paying the cost of energy for the primary home heating source directly to the utility company (bill does not have to be in the applicants name) • This includes owners and renters who pay vendors directly. • Household applicant must be a US citizen or a legally admitted alien with a social security card. 					
CITIZENSHIP	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">IF</th> <th style="width: 50%; text-align: center;">THEN</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Applicant signs an Affidavit of Citizenship</td> <td style="padding: 5px;">Applicant must provide one document from the list of secure and verifiable documents under O.C.G.A. 50-36-2.</td> </tr> </tbody> </table>		IF	THEN	Applicant signs an Affidavit of Citizenship	Applicant must provide one document from the list of secure and verifiable documents under O.C.G.A. 50-36-2.
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<p>CITIZENSHIP- ELIGIBLE FOR PROGRAM CONSIDERATION</p>		<p>Forms.</p> <p>The document provided must correlate with the name and status chosen on the Affidavit of Citizenship.</p>
	<p>Applicant cannot/does not verify citizenship/legal alien status</p>	<p>Process the application counting all income from the ineligible applicant. Do not include applicant in household count</p>
	<p>Applicant verifies status but the household contains other immigrant alien(s) or undocumented alien(s)</p>	<p>Household may be considered for services; count all income of alien(s) but do not include when determining household size</p>
	<p>If no eligible adults are in the household</p>	<p>Use the applicant's name for the application -create a unique Social Security Number for the applicant using the agency code (i.e: such as 309 for PCA) then increment the number as needed. For example: 309-11-1111</p>
	<p>United States Citizens: -born in one of the 50 states, -the District of Columbia, -Puerto Rico, -Guam, -the US Virgin Islands, or, -fulfilled all requirements and completed the process of naturalization</p> <p>Immigrant (Legal) Aliens: -admitted to the US for lawful permanent residence,</p>	

<p>CITIZENSHIP-ELIGIBLE FOR PROGRAM CONSIDERATION</p>	<p>-Cuban/Haitian Entrants, -asylees, -parolees, -persons granted amnesty -conditional entrants</p>	
<p>CITIZENSHIP-NOT ELIGIBLE FOR PROGRAM CONSIDERATION</p>	<p>Non Immigrant Aliens: -admitted to the US for lawful temporary residence -admitted for temporary employment -tourists -foreign students and diplomats</p> <p>Undocumented Aliens: -not in the US lawfully -residing in the US without INS documentation -in violation of the terms of a non-immigrant visa</p> <p>NOTE: Undocumented parents are ineligible for program consideration, but they may apply on behalf of documented minor children. The parent's income will be counted in the eligibility determination but the undocumented parent(s) will not be included in the household count.</p>	
<p>PROGRAM COMPONENTS</p>	<p>NOTE: For regular LIHEAP applications the following are recommended timeframes. The 30 day standard of promptness (SOP) must be met but the agency can use its discretion for processing each step indicated below.</p>	
<p>STANDARDS OF PROMPTNESS LIHEAP REGULAR</p>	<p>IF THE HOUSEHOLD</p>	<p>THEN DETERMINE ELIGIBILITY FOR</p>
	<ul style="list-style-type: none"> • Has current active heating service • Meets basic eligibility criteria 	<p>Regular LIHEAP- 30 day standard of promptness to pay the benefit -up to 7 calendar days to determine eligibility -up to 5 calendar days to forward to central office -EAP coordinator up to 7 calendar days to approve application</p>

<p>CRISIS</p>		<p>-up to 7 calendar days to key application into EAPS -up to 7 calendar days to mail benefit payment</p>
	<p>The Crisis component can be used to pay deposits, tank rental and reconnect fees. If the Energy payment will not address the crisis situation, the application can not be approved until the applicant can provide verification of additional funds to resolve the crisis. The CAA has up to 7 calendar days to pay crisis payments.</p>	
<p>CRISIS - LIFE THREATENING</p>	<p>IF THE HOUSEHOLD</p>	<p>THEN DETERMINE ELIGIBILITY FOR</p>
	<ul style="list-style-type: none"> • Has a life threatening situation and • A disconnection notice • Or service has been terminated • Or a reasonable anticipation of service termination exists • And meets the basic eligibility criteria 	<p>CRISIS – 18 hour standard of promptness to resolve situation -approve application the same day -key the application the same day -contact utility company to verify status of service and amount needed to satisfy resolution of the crisis (document this in the case record) -mail benefit within 7 calendar days -document the case record</p>
<p>CRISIS - 48 HOURS</p>	<p>IF THE HOUSEHOLD</p>	<p>THEN DETERMINE ELIGIBILITY FOR</p>
	<ul style="list-style-type: none"> • Has a disconnection notice • Or service has been terminated • Or a reasonable anticipation of termination exists • And meets the basic eligibility criteria 	<p>CRISIS – 48 hour standard of promptness to resolve situation -approve application the same day -key the application the next day -contact utility company to verify status of service and amount needed to satisfy</p>

<p>REGULATED MARKETER REFERRALS (PSC)</p>		<p>resolution of the crisis (document this in the case record) -mail the benefit within 7 calendar days -document the case record</p>
	<p>IF THE HOUSEHOLD</p>	<p>THEN</p>
	<ul style="list-style-type: none"> • Does not have heating service and • Is served by AGL pipelines and • Is not able to establish service with a gas marketer and • Meets basic eligibility criteria 	<p>Complete a referral to the PSC'S Regulated Marketer</p>
<p>PSC SENIOR MATCH</p>	<p>IF THE HOUSEHOLD</p>	<p>THEN DETERMINE ELIGIBILITY FOR</p>
	<ul style="list-style-type: none"> • Is 65 years of age or older and • Is served by the AGL pipelines and • And meets the basic eligibility criteria and • LIHEAP and PSC Senior Match funds are available 	<p>The Senior Match component which provides an additional benefit equal to the LIHEAP grant. -Standard of Promptness and processing requirements are the same as the REGULAR LIHEAP component</p>
<p>PSC ENERGY ASSISTANCE</p>	<p>IF THE HOUSEHOLD</p>	<p>THEN DETERMINE ELIGIBILITY FOR</p>
	<ul style="list-style-type: none"> • Is served by the AGL pipeline and • Meets basic LIHEAP eligibility criteria 	<p>PSC funded energy assistance -Standard of Promptness and processing requirements are the same as the REGULAR LIHEAP component.</p>
<ul style="list-style-type: none"> • Crisis applications should never be pended awaiting eligibility verification. • All other component applications may be pended 		

<p>PENDING APPLICATIONS</p>	<p>for 10 calendar days if all necessary documentation is not presented at the time of the application.</p> <ul style="list-style-type: none"> • The application may be denied on the 11th day. • Upon receipt of the verification, the application is subject to the 30 day standard of promptness for vendor/client receipt of the benefit.
<p>APPLICANT AUTHORIZATION</p>	<p>The applicant must be a member of the household. The applicant may designate an Authorized Representative who is not a household member when the following conditions exist:</p> <ul style="list-style-type: none"> • There is no one 18 yrs or older that is able to come into an office and make application, • DFCS has custody of an Adult Protective Services client, the caseworker may apply and sign the application for the household
<p>CATEGORICALLY ELIGIBLE</p>	<p>The authorized representative must:</p> <ul style="list-style-type: none"> • Present all household documentation necessary to determine eligibility • Sign their name on the application and worksheet. • Present a signed permission letter from the household applicant authorizing them to make application for the household.
<p>NON ENGLISH-SPEAKING HOUSEHOLDS</p>	<p>A household will be considered categorically eligible if the only income/resources in the household are :</p> <ul style="list-style-type: none"> • SSI and/or , TANF, and/or FS <p>The CAA must ensure that all lawfully admitted aliens with Limited English proficiency have access to the program by providing one or more of the following:</p> <ul style="list-style-type: none"> • provide outreach information in languages specific to those persons • hire or have access to bilingual staff • contract interpreter services • utilize community volunteers/ethnic organizations <ul style="list-style-type: none"> • Households that reside in subsidized housing and the rent includes utilities. • Households that reside in rental housing and the

<p>INELIGIBLE HOUSEHOLD'S</p>	<p>rent includes utilities with no separate bill for heating/cooling costs</p> <ul style="list-style-type: none"> • SSI recipients living in congregate care or domiciliary care facilities or foster care placements who receive SSI state supplements; • Applicants who live in other public or private institutions whose living costs are subsidized by state or local government, i.e. residents of vocational facilities whose living costs are subsidized, persons in nursing homes or medical institutions; • Applicants who live in group living facilities/quarters, i.e. rooming and boarding houses, hotels, institutions, workers dormitories, communes, military barracks, college dormitories, missions, flophouses and shelters, monasteries, sorority or fraternity houses, inmate facilities , or other quarters. • Applicants where ALL household members are non U.S. citizens. 						
<p>ELGIBILITY FORMS:</p>	<p>The following forms are used to complete an energy application:</p> <ul style="list-style-type: none"> • Intake/ Appointment Log • Application form 6000 • Worksheet Form 6003 • Verification Checklist Form 6009 • Declaration of Zero Income Statement Form 6021 • Release of Information Form if needed • Affidavit of Citizenship • Secure and verifiable document for applicant (copy of document, if applicable) • Birth certificate or social security card for other household members • See Appendix B FORMS 						
<p>DOCUMENTATION</p>	<p>Households will be responsible for providing the following:</p> <table border="1"> <thead> <tr> <th data-bbox="560 1669 966 1743">IF APPLICANT APPLIES FOR</th> <th data-bbox="966 1669 1421 1743">THEN HOUSEHOLD MUST PROVIDE PROOF OF</th> </tr> </thead> <tbody> <tr> <td data-bbox="560 1743 966 1858">Regular LIHEAP or PSC Energy Assistance</td> <td data-bbox="966 1743 1421 1858">Income, Social Security cards or accepted proof of numbers for household members, utility bill, citizenship status</td> </tr> <tr> <td data-bbox="560 1858 966 1900">CRISIS 48 Hours</td> <td data-bbox="966 1858 1421 1900">Same as above and</td> </tr> </tbody> </table>	IF APPLICANT APPLIES FOR	THEN HOUSEHOLD MUST PROVIDE PROOF OF	Regular LIHEAP or PSC Energy Assistance	Income, Social Security cards or accepted proof of numbers for household members, utility bill, citizenship status	CRISIS 48 Hours	Same as above and
IF APPLICANT APPLIES FOR	THEN HOUSEHOLD MUST PROVIDE PROOF OF						
Regular LIHEAP or PSC Energy Assistance	Income, Social Security cards or accepted proof of numbers for household members, utility bill, citizenship status						
CRISIS 48 Hours	Same as above and						

APPLICATION INTAKE		disconnection notice or proof of service termination
	CRISIS Life Threatening	Same as above, and proof of life threatening medical situation
	PSC SENIOR MATCH	Same as Regular LIHEAP/PSC and proof of age
	<p>All applications must be completed by permanent/temporary or volunteer staff that have completed a local training session.</p> <p>Employee applications must be accepted by the EAP coordinator and approved by the executive director or designee.</p> <p>CAA Responsibilities</p> <ul style="list-style-type: none"> • Maintain adequate phone lines for clients to contact agency for information and setting up appointments (do not accept calls to set up appointments prior to the 1st day of intake.) • Establish and maintain intake logs tracking applicants from point of initial contact through approval or denial • Screen applicant household's for eligibility criteria • Serve clients in a timely manner • Serve crisis applicants in a timely manner • Adhere to the first come first served policy, • Set up appointments only for the amount of money allocated. Accept only the number of applications that agency funding will allow to be processed. • Establish timely routing of applications from intake locations to the main office. • Accept list of APS clients from DFCS caseworkers • Maintain a waiting list when funds are exhausted. It should include the following information: Applicant/households name, age Address, phone #, Utility company • Daily review and document number of applications accepted, appointments set, applications dispositioned. <p>Intake staff will: Enter data on EAP application as questions are asked of</p>	

	<p>the applicant</p> <ul style="list-style-type: none"> • Make copies of all verification documents. • Determine eligibility and notify applicant of status of • Application within the standard of promptness. • Sign the application and worksheet. • Give each applicant household an information notice • Forward the application to the central office after eligibility determination. <p>Data Entry Staff will: Key only what is on the application or initial any fields that are changed by data entry staff.</p> <p>EAP Coordinator or designee will :</p> <ul style="list-style-type: none"> • Review and sign all approved and denied applications after receiving the application from intake staff • Verify the weekly approval print • Verify daily crisis print • Have payments mailed within appropriate standard of promptness for the application type and review of the approved payment print • Review error files daily • Ensure separation of duties/program integrity • Coordinate with fiscal officer on expenditure reports • Monitor all intake locations • Update, maintain and monitor waiting lists • Monitor fund balances • Authorize Voids • Authorize Transfers <p>For All Applications:</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">IF</td> <td style="width: 50%; text-align: center;">Then</td> </tr> </table>	IF	Then
IF	Then		

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 2013 and continuing in FY 2014. (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 2014.	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
Georgia currently utilizes the SUCCESS inquiry system for public benefits to cross check social security numbers against other verification systems, such as interfaces with Federal IRS and SSA data bases. However, the Energy Assistance Program computer system cross references social security numbers of applicants who apply for assistance to prevent duplication of benefit issuance.	N/A	N/A	<i>Use of all available database systems to make sound eligibility determination.</i>
VERIFYING APPLICANT INCOME			
Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 2013 and continuing in FY 2014.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.	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
All applicants are required to provide documentation of income such as check stubs, award letters, bank statements, statement from the employer. For applicants who receive public assistance, their income is verified through the SUCCESS inquiry system.	Agencies have access to the SUCCESS system, which cross checks with the new hire directories.	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 2013 that will continue in FY 2014 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 2014.	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
Operational controls in place include confidential agreements signed by staff and separation of duties among staff. The same staff that completes the application cannot key the application or approve a check voucher, or sign the checks. Financial controls also include System security: staff has different levels of system authorization to perform specific functions. All applications are filed in a closed are with limited staff access. See excerpt from Energy Assistance Policy and Procedures Manual: Application Processing, Section III-A, Page 44 and 45 under "Application Intake".	N/A	N/A	<i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i>
LIHEAP BENEFITS POLICY			
Describe FY 2013 Grantee policies continuing in FY 2014 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 2014.	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
All applicants are required to provide the heating bill with the service address as a part of the eligibility process. For anticipated disconnection and disconnected applicants the utility company is contracted to verify status of bill/service. All household members 18 and older claiming no income must complete Zero income statements. Applications are entered into a state-wide compute system by staff that is authorized to access the system with different authorization tiers. The payment process goes through several levels of verification by staff and the computer system, checking for duplicate applications and other eligibility errors before payments are issued. Once applications are processed through the computer system and are checked against the actual application, applicants are mailed a notification of approval of benefit payment to be sent directly to the utility vendor.	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 2013 procedures continuing in FY 2014 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 2014.	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
<p>All vendors who receive direct payments from LIHEAP have signed a vendor agreement to comply with the regulations and requirements of the Program. Each vendor is assigned a vendor code that is keyed into the Energy statewide computer system that is cross referenced with the vendor file when applications are keyed into the system. The applicant is required to provide a copy of their most recent bill at the time of application intake. The system produces Approval reports that are verified against the paper application before a check is issued to the vendor.</p> <p>See excerpt from Energy Assistance Policy and Procedures Manual: Benefit Payments, Section III-C pages 55-59.</p>	N/A	N/A	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2013 policies continuing in FY 2014 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 2014.	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
<p>Each Vendor must sign a Home Energy Supplier Agreement that requires their Federal Tax Identification number.</p> <p>See attached Vendor Agreement included in State Plan: Attachment D.</p>	N/A	N/A	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

BACKGROUND	The CAA is responsible for the issuance of correct payments (checks) to home energy suppliers or clients. This section contains information and procedures for use when checks are not successfully posted to client accounts.						
REQUIREMENT	Energy Assistance Payments must be processed and maintained timely, accurately, and efficiently.						
<p>BASIC CONSIDERATION</p> <p>PAYMENT METHODS</p>	<p>The Community Action Agencies will make payments to:</p> <ul style="list-style-type: none"> • energy suppliers on behalf of eligible households responsible for the payment of a primary heating source by direct billing, or • to eligible individuals whose heating or cooling costs are included in their rent and designated as a separate costs • eligible individuals whose vendors are not on the Approved Vendor List. <p>Benefits are issued on a first come, first served, first processed basis. Only one Regular payment will be made for each eligible household.</p> <table border="1" data-bbox="480 1056 1287 1633"> <thead> <tr> <th data-bbox="480 1056 727 1119">IF</th> <th data-bbox="727 1056 1287 1119">THEN</th> </tr> </thead> <tbody> <tr> <td data-bbox="480 1119 727 1350">The home energy supplier is an approved provider and on the Approved Vendor List</td> <td data-bbox="727 1119 1287 1350"> - A single- party check containing payments on behalf of multiple eligible households must be issued. -These checks must be mailed directly to the approved vendor for posting to the listed individual accounts. </td> </tr> <tr> <td data-bbox="480 1350 727 1633">The home energy supplier is not an approved provider and is not on the Approved Vendor List</td> <td data-bbox="727 1350 1287 1633">-A single party check will be issued to the individual eligible applicant.</td> </tr> </tbody> </table>	IF	THEN	The home energy supplier is an approved provider and on the Approved Vendor List	- A single- party check containing payments on behalf of multiple eligible households must be issued. -These checks must be mailed directly to the approved vendor for posting to the listed individual accounts.	The home energy supplier is not an approved provider and is not on the Approved Vendor List	-A single party check will be issued to the individual eligible applicant.
IF	THEN						
The home energy supplier is an approved provider and on the Approved Vendor List	- A single- party check containing payments on behalf of multiple eligible households must be issued. -These checks must be mailed directly to the approved vendor for posting to the listed individual accounts.						
The home energy supplier is not an approved provider and is not on the Approved Vendor List	-A single party check will be issued to the individual eligible applicant.						

STANDARD OF PROMPTNESS	IF	THEN
	The application is approved	The pink slip must be mailed to the applicant within 5 calendar days after the application appears on the Approved Transaction List.
	The application is denied	The yellow slip and fair hearing letter must be mailed to the applicant within 5 calendar days of the determination that the household is not eligible.
	IF	THEN
	The application type is Regular	The application must be processed, paid and the vendor notified within 30 calendar days from the date of application.
	The application type is Crisis (Life Threatening)	The application must be accepted, processed and the vendor notified within 18 hours from the date of application. Payment must be made within 5 calendar days from the date of application.
	The application type is Crisis (Non-Life Threatening)	The application must be accepted, processed and the vendor notified within 48 hours from the date of application. Payment must be made within 5 calendar days from the date of application.
	The application type is Pending (Awaiting Verification/Documentation)	The application must be held 10 calendar days for receipt of Verification/Documentation. The application may be denied on the 11 th day.

LOST- STOLEN- DESTROYED CHECKS	IF	THEN
	It is determined that the check has been paid	<p>-The local CAA director or designee of the office that issued the check AND the payee must inspect the endorsement on the check. -The payee must sign an affidavit stipulating that the payee of the check neither endorsed nor received the proceeds of the check and establish forgery of the endorsement.</p> <p>-The CAA will use the affidavit to obtain recovery through the bank.</p> <p>-Upon receiving the receipt of credit from the bank the CAA will initiate processes to VOID/REISSUE the check.</p>
RETURNED CHECKS	It is determined that the check has not been paid	<p>-The local CAA must determine if the applicant's address on the check is accurate</p> <p>-A Stop Payment must be issued after a period of 10 days from the Check Issue Date.</p>
	IF	THEN
The payee (individual applicant) has: -moved and -still maintains an active account with the original vendor	-Re-mail the original check to the current, correct address.	
The payee (individual applicant) has: -moved and -cannot be located and -no credit was extended by the vendor based on the EAP application	-The check must be canceled and the CAA must begin processes to VOID the application/benefit in the EAP system.	
The individual	-The check must be canceled and the	

ENERGY ASSISTANCE

BENEFIT PAYMENTS

	<p>applicant is: - deceased and is the only household member, and no credit was extended by the vendor based on the EAP application</p>	<p>CAA must begin processed to VOID the application/benefit in the EAP system.</p>
	<p>The individual applicant is deceased but the household is still occupied by member(s) of the original application household</p>	<p>-The ownership of the check should be transferred to the name of another household member -Document the reasons for the disposition in the case file</p>

MIS-POSTED BENEFIT AMOUNTS	IF	THEN
	<p>The benefit amount on vendor or applicant issued checks is posted to the wrong account</p>	<p>-The individual applicant has the responsibility to notify the LAA that took the application -The LAA must co-ordinate with the vendor to insure the benefit is posted/credited to the correct account.</p>

INCORRECT HOME ENERGY SUPPLIER	IF	THEN
	<p>An application is processed with an incorrect vendor code and the benefit check has not been issued</p>	<p>-The local office that took the application must advise the office issuing the check to stop the issuance -The benefit must be marked through on the computer generated check register -The amount must be deducted from the vendor grand total -The original application must be Voided and Reissued in the EAP system -Documentation must be entered on the Check</p>

REFUNDS	IF	THEN
	A check amount has been posted to an account, the account is closed, and a credit balance exists	-The excess amount must be returned to the CAA that issued the check.
	IF	THEN
	A refund check is received by the CAA and the check is made payable to the agency	-The CAA must deposit the check in the CAA account and issue an agency check made payable to DHR -The EAP system must be updated to show a refund of the benefit (contact Project Administrator)
	A refund check is received by the CAA and the check is made payable to the individual	-The CAA must return the check to the vendor requesting the check be reissued made payable to the CAA.
A refund check is received by the CAA, made payable to either the applicant or the agency and the CAA cannot determine the Fiscal Year for which the refund is	-The CAA must contact the Project Administrator for consultation.	

TRAINING AND TECHNICAL ASSISTANCE			
In regards to fraud prevention, please describe elements of your FY 2013 plan continuing in FY 2014 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 regimen and technical assistance resources from your plan which will represent newly implemented in FY 2014.	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
<p>Staff signs a Confidential Agreement not to disclose sensitive client information; agencies obtain background checks on employees. Only the Executive Director or the Energy Assistance Coordinator is authorized to complete applications for employees who qualify for LIHEAP assistance. There are Separation of duties at the local level to prevent fraud. Yearly statewide trainings are held and technical assistance is provided as needed to all agency staff administering the program. See excerpt from Energy Assistance Policy and Procedures Manual: Application Processing, Section III-A, Pages 44 and 45, "Intake Staff Will, Data Entry Staff Will, EAP Coordinator or Designee Will".</p>	N/A	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>
AUDITS OF LOCAL ADMINISTERING AGENCIES			
Please describe the annual audit requirements in place for local administering agencies in FY 2013 that will continue into FY 2014.	Please describe new policies or strategies to be implemented in FY 2014.	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>Each agency administering LIHEAP is required to have an independent audit as required by the State.</p> <p>During the State Level Monitoring review, audits for the previous three years are reviewed for compliance.</p>	N/A	N/A	<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>

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.