

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 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:	
RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2014 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
<i>No audit findings of material weaknesses or reportable conditions occurred in the past 3 years.</i>	NONE	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

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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 2013, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<ol style="list-style-type: none"> 1) Eligibility staff training prior to case handling. 2) Standardized training plan that includes policies & procedures, timeliness, expectations and agency cultural values. 3) Supervisory reviews to ensure policy is followed. 4) Our system checks application data entered to ensure ineligible applications due to income or other policies are not approved. 5) Worker calls are monitored to ensure confidentiality. 6) Sample pulls for quality assurance of core data elements. 	None	N/A	A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.
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
<ol style="list-style-type: none"> 1) Fraud Hotline 2) Customer Service Toll-Free telephone number 3) LIEAP toll-free number 4) If reported, a local fraud investigator will look into the case and the appropriate action will be taken. 	None	N/A	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.

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>1) <i>The State of Kansas utilizes a number of tools to verify identification and household composition.</i></p> <p>2) <i>Cross-referencing against data in legacy systems to verify household composition, income, ID and address.</i></p> <p>3) <i>Cross-referencing with utility vendors to assure ownership of the utility account.</i></p> <p>4) <i>SSN and address match with our agency case information.</i></p> <p>5) <i>SSN verification with Social Security database. Our system also performs checks with the Social Security databases.</i></p> <p>6) <i>We utilize SAVE system for verification of citizenship when appropriate.</i></p>	None	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
<i>State of Kansas does not require a Social Security Number but we do strongly encourage the consumer providing it. If not provided, we utilize a pseudo number.</i>	N/A	If consumer does not provide a SSN, the State utilizes a pseudo number for identification. We still cross reference against legacy systems to verify as well as cross-match with utility accounts to confirm SSN, address, account number, and names.	<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 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
<i>State of Kansas utilizes EATSS system to verify SSNs and also relies upon cross-reference to other legacy benefit systems to verify and confirm SSN accuracy. As a secondary match we also cross match with utility account information to confirm SSN on account owner.</i>	None	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
<i>The State of Kansas utilizes a number of verification options for income. These include but are not limited to manual review of paystubs, verification against income information in legacy benefit systems, verification utilizing the TALX "Work Number" database, state tax withholding database, etc. If conflicting or incomplete income data is received the State will investigate to resolve inconsistencies. The State contacts employers directly, ask for additional customer information or uses fraud investigators.</i>	None	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
<p><i>Access to client specific information in the eligibility system is controlled via the use of "profiles" that define both what staff can access to view and to alter. In addition, use of EATSS system is closely monitored to assure proper use and this monitoring includes validation of the appropriateness of inquiries related to SSN information.</i></p> <p><i>Agent staff receives confidentiality training and acknowledge and sign our confidentiality rules. In addition, customer calls are monitored randomly to review and ensure confidentiality rules are being followed.</i></p>	<p>None</p>	<p>N/A</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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
<p><i>The State of Kansas uses a 2-step eligibility process. One person registers the application and a different person determines eligibility. We require verification of utility accounts either by having the consumer provide a copy of a recent billing or in the case of the major utilities, we have access to utility websites to verify account information.</i></p> <p><i>In the case of our two primary utility vendors, we use a process of electronic verification that allows the utility to confirm the accuracy of the information submitted and validate the existence of a utility account in the applicant's name.</i></p>	None	N/A	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

PROCEDURES FOR UNREGULATED ENERGY VENDORS			
<p>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 unregulated energy utilities.</p>	<p>Please highlight any strategies policy in this area which will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>We will reference any vendor against the Kansas vendor association lists. When no match is found, the State will investigate further to assure existence. We also require unregulated companies to provide proof of advertisement.</i></p>	<p>None</p>	<p>N/A</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
<p>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.</p>	<p>Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY 2014.</p>	<p>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?</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>The State of Kansas utilizes two primary methodologies. First for the major utilities, we have access to websites (provided by the utilities) to verify account information including address, names, SSNs and account status.</i></p> <p><i>For the other vendors, we require the consumer provide a current copy of a billing from the utility vendor. If the consumer pays their utilities as part of their rent payment, we require a letter of confirmation submitted separately by the landlord that the utilities are included in the rent and that the consumer is current on their rent payments.</i></p>	<p>None</p>	<p>N/A</p>	<p><i>An effective process that effectively confirms the existence of entities receiving federal funds.</i></p>

TRAINING AND TECHNICAL ASSISTANCE			
<p>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.</p>	<p>Please highlight specific elements of your training regimen and technical assistance resources from your plan which will represent newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>Available Resources</i></p> <ul style="list-style-type: none"> - Fraud hotline - Customer Service Toll-free telephone number - LIEAP toll free number - If reported, a local fraud investigator will look into the case and the appropriate action will be taken. 	<p>None</p>	<p>N/A</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>
AUDITS OF LOCAL ADMINISTERING AGENCIES			
<p>Please describe the annual audit requirements in place for local administering agencies in FY 2013 that will continue into FY 2014.</p>	<p>Please describe new policies or strategies to be implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>N/A The State of Kansas does not utilize local administration</i></p>	<p>None</p>	<p>N/A</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

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.