

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): State of Nebraska		Date/Fiscal Year: 2014	
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.
The most recent Audit findings for the LIHEAP cited an inconsistency between our LIHEAP plans for FY 2011 and FY 2012 and supplemental payments that were issued in 2011 and 2012. The finding also noted some instances where benefits were issued to potential ineligible households or household members.	The inconsistency between the supplemental payments issued in 2011 and 2012 to the State plans for these years has been corrected as updated plans were submitted to ACF in May 2013. The previous system used to store data and issue payments was replaced with NFOCUS in 2013. The new system includes additional system checks and interfaces that will assist in the prevention of incorrect payments.		The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.

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.
The Nebraska Economic Assistance Review System (NEARS) is a supervisory case review system. Findings are monitored and training needs assessed from the findings. NEARS has been approved by the Nebraska Auditor of Public Accounts. Besides the supervisory readings for NEARS, Program Accuracy Specialists (PAS) also do case reviews and report the findings on NEARS.	N/A	N/A	<i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information</i>

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 from these systems and strategies.

<p>Fraud can be reported by making phone call to the customer service centers, local offices, Central Office, emails, ACCESSNebraska and letters to the offices or state officials. Calls can be made directly to the Special Investigations Unit at DHHS.</p>	<p>N/A</p>	<p>N/A</p>	<p>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.</p>
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Attachment – page 2

<p>VERIFYING APPLICANT IDENTITIES</p>			
<p>Describe all FY 2013 Grantee policies continuing in FY2014 for how identities of applicants and household members are verified</p>	<p>Please highlight any policy or strategy from your plan which will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies.</p>
<p>The State of Nebraska Department of Health and Human Services (DHHS) conducts various electronic matches through the Nebraska Family Online Client User System (NFOCUS) on all households that make an application for LIHEAP. The electronic matches include the Social Security Administration, state employer wage files, unemployment compensation files, the Nebraska Child Support program and vital statistics.</p>	<p>DHHS has added the LIHEAP program to NFOCUS for FY2013 so 100% of all LIHEAP household members will have their identities verified.</p>	<p>N/A</p>	<p>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</p>

<p>SOCIAL SECURITY NUMBER REQUESTS</p>			
<p>Describe the Grantee's FY 2014 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</p>	<p>Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2014, or remaining the same.</p>	<p>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</p>	<p>Necessary outcomes from these systems and strategies.</p>

		prevent fraud.	
Social Security Numbers (SSN) must be provided for all household members. If the head of the household is undocumented, there must be at least one documented individual in the household with a valid SSN.	N/A	N/A	All valid household members are reported for correct benefit determination.

Attachment – page 3

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
SSN's are required for all LIHEAP household members. The SSN's will be identified through the enumeration process with the Social Security Administration (SSA). The process consists of verifying the name, date of birth and SSN against SSA records.	No change for FY2013 other than all LIHEAP eligibility will be done on NFOCUS and 100% of all household members will go through the enumeration process.	N/A	Use of all available database systems to make sound eligibility determination.

VERIFYING APPLICANT INCOME			
Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 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
Income of all household members must be verified. The State of Nebraska uses several electronic matches to verify the income. The matches include the State Employment Wage file (SEW), New Hire Match (NHM),	No change for FY2013 other than all LIHEAP eligibility will be done on NFOCUS and 100% of all household members will go through the income verification		Effective income determination achieved through coordination across program lines.

<p>Unemployment Compensation match (IUC), Bendex (BDE-SSA), State Data Exchange (SDX-SSA), and a yearly match with Veterans Administration. Some of these matches will be used to verify the income while other matches will be used as a lead only that requires verification. A self-employed individual is required to provide the most current tax return or their daily, weekly or monthly ledgers that will indicate income, expenses, etc.</p>	<p>process.</p>		
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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
DHHS follows all HIPAA and legal determinations on what information can be released and can receive the information. A signed release form would be required from the household if the information requested does not meet either HIPAA or legal guidelines. The release of information form is also used when DHHS is verifying an individual's information such as a bank account or employment information. The applications for assistance include the release form.	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
Payments are determined by the household size, type of dwelling the household lives in and the household's income. A vendor agreement is signed between DHHS and the utility provider. The agreement sets the expectations of	N/A	N/A	<i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i>

<p>the utility provider and the actions they can or cannot take with a LIHEAP eligible household, how providers will be paid and that either DHHS or the provider can cancel the vendor agreement. Payments are made to either the provider by EFT or to the household by the use of a ReliaCard or an automatic deposit into the households account.</p>			
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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 unregulated 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
Same as above.	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
Payments will not be made to utility providers without knowing the type of fuel that is being provided and having a signed agreement. The provider agreement will include the Federal Identification Number (it could be SSN), the business name, address, phone number of the provider and the type of fuel that will be provided. Included in the agreement will be the information about the deposit of funds by EFT. If the utilities are not in the name of the household there must be documentation as to whose name the utilities are in and the reason for them not being in the name of a household member. There are also instances the utilities are included in the rent but the household is still eligible for benefits because they are subject to an increase in rent due to the rising cost of utilities. Those payments then can be made directly to the household.	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 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 regiment 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
All DHHS employees go through training specific to the LIHEAP program. Ongoing training is completed with employees when changes to the program are made or when the NEARS process reveals a need for training in a particular area. DHHS does not employ nongovernmental staff in making eligibility determinations. DHHS Central Office staff will work with providers directly when changes to procedures are made. This was evidenced in the change to EFT payments for FY2013.	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
DHHS will continue to use the State of Nebraska Office of the Auditor of Public Accounts and the NEARS process to monitor cases and provide annual audits.	N/A	N/A	<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>