

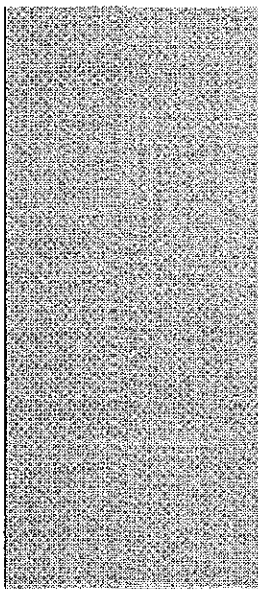
**ATTACHMENT 3**  
**SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE**  
 Low Income Home Energy Assistance Program (LIHEAP)

**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): New York State			Date/Fiscal Year: 2013-14
<b>RECENT AUDIT FINDINGS</b>			
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
During FFY 2013, OTDA completed reviews of 34 LIHEAP vendors. OTDA found 59% (20) to be in full compliance of the terms of the Vendor Agreement. OTDA found that 35% (12) of vendors failed to charge their HEAP customers at or below the contract price for the commodity delivered; which is the pricing formula stipulated in the contract. OTDA found 6% (2) of vendors failed to make timely deliveries.	Each vendor which overcharged or short delivered LIHEAP clients was required to issue a credit to the individual customer's account and to also make account adjustments to other LIHEAP clients in their customer base and notify each customer individually in writing. In addition, they were required to submit a Corrective Action Plan to ensure that OTDA LIHEAP pricing and delivery timeframe policies and NYS Department of Agriculture and Markets policies for measurement for quantity of		The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.

<p>New York State's LIHEAP program is audited annually under the Single Audit Act. No Single Audit findings of material weaknesses, reportable conditions of questioned costs were identified for FFY2012 for the prior three years</p> <p>OTDA conducts annual on-site monitoring reviews of at least ten local social services districts. No findings of material weaknesses, reportable conditions of questioned costs were identified for FFY 2012 or the prior three years</p>	<p>fuel wood would be adhered to in the future</p> <p>New York State will implement stronger case supervisory review guidelines to prevent and deter worker fraud.</p>	
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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

<p><b>COMPLIANCE MONITORING</b></p>			
<p>Describe the Grantee's FY 2014 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.</p>	<p>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies.</p>
<p>OTDA conducts annual on-site reviews of at least ten local social services districts to monitor compliance with State and Federal LIHEAP policies and procedures. Districts are chosen for review based upon factors that include, but are not limited to, the number of application approvals during the immediately preceding HEAP program year and non-compliance in resolving issues identified in previous monitoring reviews.</p> <p>During FFY2014, OTDA will</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>

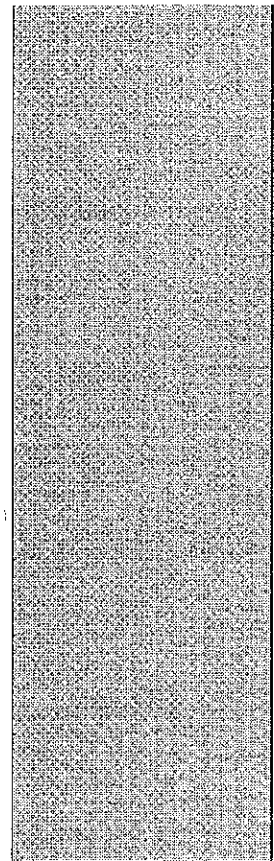
<p>continue to review a sample of LIHEAP vendors to ensure compliance with the terms and conditions of the New York State LIHEAP Vendor Agreement</p> <p>NYS's LIHEAP program is audited under the Single Audit Act. An annual audit of local administering agencies is conducted.</p> <p>OTDA conducts periodic reviews of the New York State Division of Homes and Community Renewal's administration of LIHEAP funded weatherization programs.</p>			
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<p><b>FRAUD REPORTING MECHANISMS</b></p>			
<p>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.</p>	<p>Please highlight any tools or mechanisms from your plan which will be newly implemented in FY 2014, and the timeline for that implementation.</p>	<p>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.</p>	<p>Necessary outcomes of these strategies and systems</p>
<p>OTDA has a Reporting Welfare Fraud form that is accessible from the OTDA internet site which allows the public to report suspected instances of welfare fraud and abuse. Once submitted, the information is automatically matched to a database of recipients to determine if the individual about whom the fraud allegation was made is known to the Welfare Management System</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>

database. Those individuals that do match are flagged for review by OTDA Program Integrity staff, who then determines if the allegation should be referred to the local district for investigation. The local district investigators, in turn, are able to access the system to review the fraud allegation and enter the results of the investigation directly into the system. System-generated and ad-hoc reporting capabilities allow Program Integrity and local district staff to track and report the results of the fraud allegation submissions and subsequent investigations.

The public may also report fraud directly to the Local Social Service Fraud Units as well as through hotlines or websites that certain districts have.

In addition, the NYS Welfare Inspector General's Office has a fraud reporting hotline.



**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>Identity must be documented for each LIHEAP household member at the point of initial application with one of the following:</p> <ul style="list-style-type: none"> <li>• Driver's license</li> <li>• Birth certificate</li> <li>• Baptismal certificate</li> <li>• School records</li> <li>• Collateral contact with landlords</li> <li>• Social Security card</li> <li>• Marriage certificate</li> <li>• Passport</li> </ul> <p>New York State requires SSNs for all household members applying for HEAP. All SSNs are verified with the Social Security Administration (SSA) for validity.</p> <p>NYS's Welfare Management System (WMS) performs an electronic clearance process for all new applicants to provide local district workers with information about the applicant's current and past involvement as an applicant or recipient of assistance. Search criteria consists of matching name, gender, date of birth, Social Security number and Client Identification Number (CIN) (if previously assigned). Rigid controls and edits have been established to ensure that each applicant has only one CIN and that the demographic information associated with that applicant and CIN is accurate.</p>		N/A	<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>

<b>SOCIAL SECURITY NUMBER REQUESTS</b>			
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>For FFY 2014, New York State will continue to require Social Security numbers (SSNs) for all household members applying for HEAP.</p> <p>All SSNs are verified with the Social Security Administration (SSA) for validity.</p>		N/A	<p><i>All valid household members are reported for correct benefit determination.</i></p>

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
<p><u>SSN Validation:</u> Household members applying for HEAP with SSNs present undergo a batch processing activity known as SSN validation whereby WMS sends SSNs with associated demographic data to the Social Security Administration (SSA) for comparison. If the SSN and demographic data that is associated with an individual on WMS matches the information on file with the SSA, then that individual's SSN Code is changed to '8' (SSN validated) in WMS. If the SSN is not validated by SSA, the SSN Code is changed to a value to indicate the reason the SSN was not validated. SSN validation occurs on a weekly basis and again on a monthly basis for a recheck regardless of their existing validation code.</p> <p><u>SSA Death Match:</u> Household members applying for HEAP with SSNs present are part of a monthly match, whereby WMS sends to SSA individuals with SSNs present; and, if SSA records indicate that that individual has been reported as deceased, for Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) cases receiving HEAP, single-individual cases are automatically closed and multi-individual cases are reported to local districts for appropriate action (i.e. deletion of the</p>	<p>N/A</p>	<p>N/A</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>

deceased individual and possible grant recalculation)

TA/SNAP Prison Match: On a monthly basis, TA and SNAP individuals (who may also be in receipt of HEAP benefits) are matched with New York State Division of Criminal Justice Services (DCJS) and New York State Division of Correctional Services (DOCS) databases to determine if those individuals are currently incarcerated. If a match is found, a monthly auto-close process occurs for single-individual cases, closing their TA and/or SNAP case and their corresponding categorical income eligibility for HEAP. Districts are notified of all cases closed as part of this process. State staff from OTDA's Office of Audit and Quality Improvement (A&QI), receive lists of multi-person cases and refer these cases to local districts for investigation.

**VERIFYING APPLICANT INCOME**

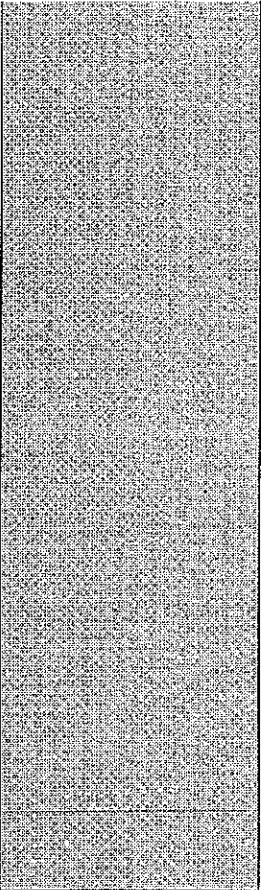
Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 2013 and continuing in FY 2014.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.	If the Grantee won't be 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
New York State did not use State directories of new hires or similar systems to confirm income eligibility for LIHEAP in FFY 2013 and does not plan to do so in FFY 2014. The data in such systems is not real-time, and therefore, does not provide New York State with the ability to correctly confirm income eligibility at the point in time when an applicant applies for what is, for the vast majority of New York State's HEAP recipients, a one-time per year HEAP benefit.		New York State will verify applicant and household member incomes in FFY 2014 for households not in receipt of recurring TA, SNAP or Code A SSI in accordance with the procedures in the New York State HEAP Manual. Applicants defined as "new" (did not receive HEAP in previous year through the application process, or moved to a different county since last year's application) will be required to provide paystubs, award letters or other forms of income documentation. Self-	<i>Effective income determination achieved through coordination across program lines.</i>



employment income may be documented with the most recently filed itemized federal tax forms or by providing documentation of funds received and expenses for the three months prior to the month of application.

Returning applicants will be required to provide documentation of earned income (paystubs, employer statements, collateral contact, or other acceptable forms of written documentation, and self-employment income as described above) and must declare all other income sources. Non-earned income amounts are compared against the previous year to determine if there have been changes that now require documentation.

NY implemented a real time data match with the NYS Department of Labor to obtain UIB data.



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>Access to HEAP case information and issuance of HEAP payments is limited to specific staff members and data entry terminals through the Terminal Transaction Security System (TTSS), a sub-system of WMS. TTSS is the security system that controls and monitors access to State legacy systems/centralized data base information on a need-to-know basis. All system users are assigned User IDs which allow limited access to HEAP information; and depending on functions assigned that User ID, may allow the ability to issue HEAP payments. TTSS manages day-to-day security-related data and activities needed to meet user access requirements by applying and adhering to the shared security mandate of granting access permissions and entitlements based on the fundamental principle of least privilege, i.e. granting the minimum access required to perform one's job duties when requesting, creating and managing user accounts and permissions.</p>	<p>The stringent controls in place will be continued in FFY 2014.</p> <p><u>Confidentiality</u> All personally identifying information about a HEAP applicant or recipient is confidential and may be disclosed only for purposes of investigating or prosecuting suspected fraud or abuse, in cooperation with Federal or State authorities regarding LIHEAP audits or investigations, or with the written consent of the applicant or recipient.</p> <p>OTDA will reinforce to Idss' the confidentiality and information security rules outlined in OTDA 10-LCM-17.</p> <p>Local district management must also assure that all individuals with access to personal, private and sensitive information understand the laws and policies related to its use, and receive training on the proper use, handling and safeguarding of such data. Training requirements can be met through the completion of the OTDA <i>Information Security Awareness Training (ISAT)</i> course available on Training Space (<a href="http://www.trainingspace.org">www.trainingspace.org</a>), the <i>Cyber Security Awareness Training</i> course available through the NYS Governor's Office of Employee Relations (GOER) (<a href="http://www.goer.state.ny.us/Training_Development/NYS-Learn/index.cfm">www.goer.state.ny.us/Training_Development/NYS-Learn/index.cfm</a>), or through a locally provided equivalent provided that records related to training completion are retained for review and auditing purposes. Additional specific training requirements related to access to unique specific data, such as information provided by the Internal Revenue Service and Social Security Administration, may also apply, along with the requirement to sign Acknowledgement of Confidentiality Agreements. Local district management must assure proper</p>		<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

account and access management practices are strictly followed by local administrators and staff. Access must be limited to only those individuals whose job duties require it, and promptly disabled/retracted when such access is no longer warranted – i.e. the individual leaves the agency or their job functions change

**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>To ensure accountability and to protect against internal fraudulent transactions, WMS has in place a system to track the User ID, Date, Time and Terminal used by individual workers who may inquire into or enter data, including the issuance of HEAP benefits, into the WMS database. In instances of suspected fraud or abuse of the system, reports can be generated to identify individuals who may attempt to perform such unwarranted transactions. Additionally, all transactions generate a "tagged user" through WMS' Local Data Feedback (LDF) process to identify for local district management staff, the origin of any transactions performed on the</p>	<p>The stringent controls in place will be continued in FFY 2014</p>		<p>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</p>

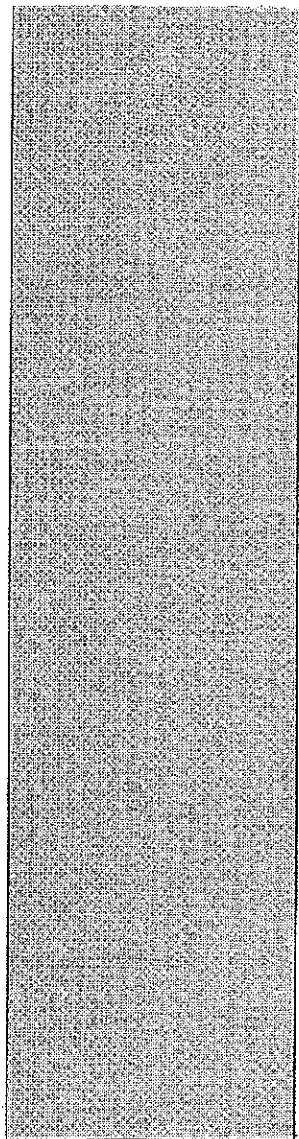
system

WMS has in place numerous on-line and batch processing edits to prevent the accidental or purposeful issuance of duplicate HEAP benefits. Only one regular HEAP benefit (Pay Type H) may be issued per case during each HEAP benefit year and, additionally, the Benefit Issuance and Control Subsystem (BICS) contains edits and controls to prevent duplicate issuances for various other HEAP single-issue payment types. Additionally, WMS edits ensure that payments authorized must match stored budgets contained in its Automated Budget and Eligibility Logic (ABEL) budgeting subsystem.

During FFY 2014 OTDA will continue to review a sample of LIHEAP vendors to ensure compliance with the terms and conditions of the New York State LIHEAP Vendor Agreement.

Notices issued to recipients contain information on the amount paid and the vendor name.

NYS policy required two levels of review on all applications unless the district has a Case Supervisory Review Plan approved by OTDA.



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
<p>To ensure accountability and to protect against internal fraudulent transactions, WMS has in place a system to track the User ID, Date, Time and Terminal used by individual workers who may inquire into or enter data, including the issuance of HEAP benefits, into the WMS database. In instances of suspected fraud or abuse of the system, reports can be generated to identify individuals who may attempt to perform such unwarranted transactions. Additionally, all transactions generate a "tagged user" through WMS' Local Data Feedback (LDF) process to identify, for local district management staff, the origin of any transactions performed on the system.</p> <p>WMS has in place numerous on-line and batch processing edits to prevent the accidental or purposeful issuance of duplicate HEAP benefits. Only one regular HEAP benefit (Pay Type H1) may be issued per case during each HEAP benefit year and, additionally, the Benefit Issuance and Control Subsystem (BICS) contains edits and controls to prevent duplicate issuances for various other HEAP single-issue payment types. Additionally, WMS edits ensure that payments authorized must match stored budgets contained in its Automated Budget and Eligibility Logic (ABEL) budgeting subsystem.</p>	<p>The stringent controls in place will be continued in FFY 2014.</p> <p>During FFY 2014, OTDA will continue to conduct on-site reviews of a sample of LIHEAP vendors to ensure compliance with the terms and conditions of the New York State LIHEAP Vendor Agreement and to verify the authenticity of LIHEAP vendors. In addition, at least, five vendors required to correct findings related to FFY 12 OTDA audit will be subject to a follow up OTDA audit in FFY14.</p>	<p>The processes that have been in place combined with the new processes that will be implemented in FFY 2013 will serve to further avoid and limit vendor fraud.</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>

During FFY 2014 OTDA will continue to review a sample of LIHEAP vendors to ensure compliance with the terms and conditions of the New York State LIHEAP Vendor Agreement. Audit findings are provided in writing to the vendor and the OTDA HEAP Bureau. Corrective action, such as crediting customer accounts in the case of overcharging, is required in situations where there are negative audit findings. Follow up is conducted in these cases to ensure compliance.

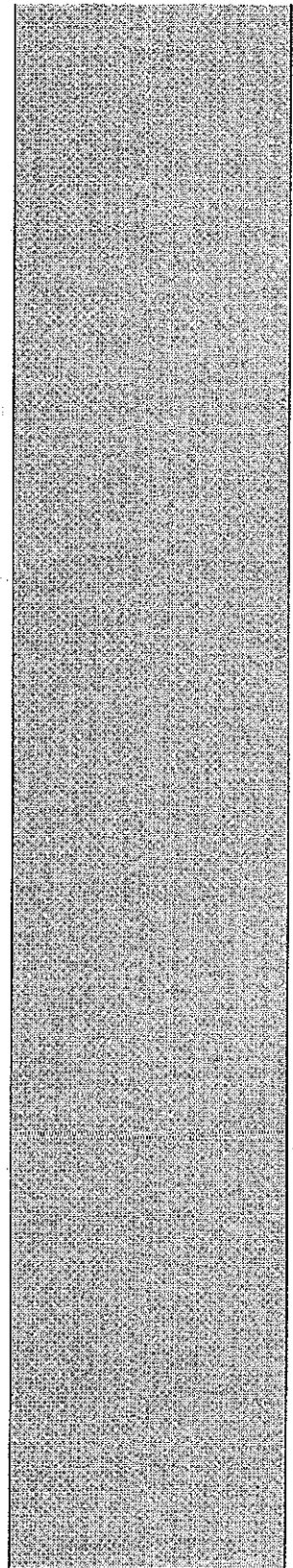
Vendors may be terminated for any reason, including, but not limited to failure to conduct corrective action, repeated negative audit findings, and repeated certifier and client complaints.

Notices issued to recipients contain information on the amount paid and the vendor name:

NYS policy required two levels of review on all applications unless the district has Case Supervisory Review Plan approved by OTDA.

NYS requires all vendors to sign a vendor agreement, provide proof of liability insurance and provide a valid EIN. Payments are issued through the NYS Office of the State Comptroller and a 1099 issued to any vendor where total payments exceed \$600. Vendors are also required to submit signed W-4s for each county that will authorize payments to that vendor. Counties then issue Vendor IDs to each vendor for use in WMS.

Language regarding penalties for fraud and required corrective action is found in the vendor agreement.



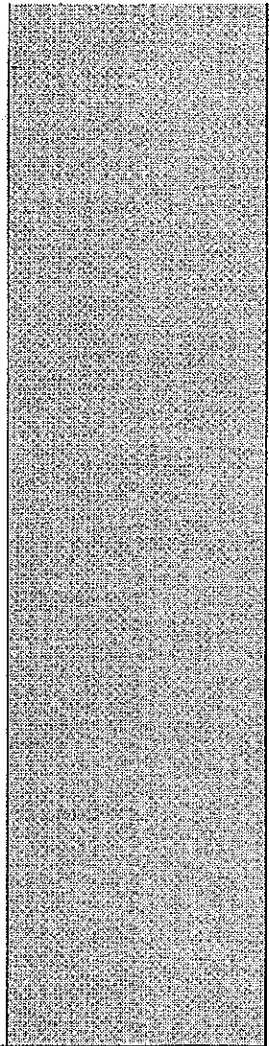
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2013 policies continuing in FY 2014 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of the Grantee's procedure for averting fraud.	Please highlight any policies for verifying vendor authenticity which 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>All vendors must provide:</p> <ul style="list-style-type: none"> <li>• Federal tax ID number</li> <li>• Proof of insurance</li> <li>• Proof of licensing</li> </ul> <p>During FFY 2014, OTDA will continue to conduct on-site reviews of a sample of LIHEAP vendors to ensure compliance with the terms and conditions of the New York State LIHEAP Vendor Agreement and to verify the authenticity of LIHEAP vendors.</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>OTDA conducts training sessions in August of each year to train local social services district and alternate certifier staff on the changes for the upcoming HEAP season. In addition, New York State provides new HEAP certifiers with the opportunity to attend HEAP Basic Certification Training, which provides in-depth training on correctly determining HEAP eligibility and on using the benefit authorization systems correctly.</p> <p>OTDA provides local district and alternate certifier staff with a HEAP Manual that is updated annually and which provides detailed instructions on correctly determining and documenting eligibility and on correctly authorizing payments to energy vendors on behalf of eligible clients. The instructions in the HEAP Manual and additional policy and procedural requirements are provided to local districts in writing on a regular basis throughout the year.</p> <p>OTDA communicates information to LIHEAP vendors on the correct procedures and policies to follow.</p>		<p>N/A</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>



in determining the correct price to charge HEAP recipients, in applying HEAP benefits and in making LIHEAP funded fuel deliveries.

All HEAP applicants are provided with a client notice that describes the benefit amount if the client has been determined eligible. For clients that are not eligible, the client notice provides the reason why the client is not eligible. If the benefit is being directly issued to the client's energy vendor on behalf of the client, the client notice provides the name of the vendor where the benefit is being sent. Clients, therefore, have the information necessary to inform their local certifier if the payment is not being sent to the correct vendor. All individuals in receipt of a HEAP benefit in the prior year are sent a HEAP Application for the current year and a cover letter is included with the application that provides details on eligibility requirements, and any documentation or eligibility changes from the prior year. New York State also has a HEAP hotline that clients may call if they are in need of information or assistance.



**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>
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Local administering agencies were audited in accordance with the requirements in OMB Circular A-133 in FFY 2010, and will continue to be audited in accordance with these requirements in FFY 2014	The stringent requirements in place will be continued in FFY 2014	N/A	<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>
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**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.