

ATTACHMENT 1
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

HHS is requiring further detail from States on their FY2011 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that States highlight and describe all elements of this FY2011 plan which represent improvements or changes to the State's FY2010 plan for preventing and detecting fraud, abuse and improper payment prevention.

State, Tribe or Territory (and grant official): CHIPPEWA CREE TRIBE

Date/Fiscal Year:

1. -RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2010 or the prior three years, in annual audits, State 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 FY2011.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
<p>Audit findings fund 3 clients over income of the 543 households served during FY/09.</p>	<p>The audit findings were resolved. 3 clients allocation were paid back by non-federal funds. The Director and staff met with the auditor to develop a system to avoid this from happening again. The</p>	<p>If there is no plan in place, please explain why not.</p>	<p>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</p>

	<p>auditor suggested income be received from the payroll department if the client is using wages, Sub-contractors will use last Tax Filing information. The staff implemented a peer review process the last hour of each work day to review those applications received that particular day, to ensure application is complete with verified income.</p>		
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2. - COMPLIANCE MONITORING

<p>Describe the State's FY2010 strategies that will continue in FY2011 for monitoring compliance with State and Federal LIHEAP policies and procedures by the State and local administering agencies.</p>	<p>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY2011.</p>	<p>If you don't have a firm compliance monitoring system in place for FY11, 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>The Chippewa Cree Tribe has an internal Auditor on site to monitor compliance system for LIHEAP</p>	<p>Due to the three findings, peer review and Monitoring by the Internal Auditor will ensure all clients are eligible for service.</p>	<p>If you don't have a firm compliance monitoring system in place for FY11, please describe how the State is verifying that LIHEAP policy and procedures are being followed.</p>	<p><i>A sound methodology with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

3. - FRAUD REPORTING MECHANISMS

<p>For FY2010 activities continuing in FY2011, please describe all (a) mechanisms available to the public for reporting cases of suspected LHEAP 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 FY2011, 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>A telephone call will be accepted without the person reporting having to identify themselves. All calls will be investigated</p>	<p>The Tool available will be the telephone call or the public can report the issue in writing without using his/her name. At this time, I do not believe the Tribe as a specific policy addressing this issue. The Director's are mandated to attend all regular Tribal Business Committee Meetings, and I will request a policy established by the Tribe and as soon as the Policy is written and approved, I will forward the policy to your office. In the Meantime, notices are displayed for anyone wanting to report fraud, can either our telephone number or the number of the Criminal Investigator at Law Enforcement. The caller can remain anonymous and all calls will be forwarded to the</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><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>

C.I. Until the policy is written and approved, Telephone numbers for the LHEAP Office and Law Enforcement will be listed on the Posters.

4. - VERIFYING APPLICANT IDENTITIES

<p>Describe all FY2010 State policies continuing in FY2011 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 FY2011.</p>	<p>If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The head of household must show a picture ID and a legal document with SSN for head of household and residents of household.</p>	<p>This has been a requirement for several years and has served the program well</p>	<p>If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.</p>	<p>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</p>

5. - SOCIAL SECURITY NUMBER REQUESTS

<p>Describe the State's FY2011 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 FY2011, or remaining the same.</p>	<p>If the State is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All members of the family must provide an accurate SSN document. SSN# are provided on Mt State Drivers license, Tribal Enrollment ID or Certificate and the IHS Facilities Certifies SSN# also. With the new Data Base, we will now use that system.</p>	<p>This has been a part of the plan for a number of years and continues.</p>	<p>If the State is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.</p>	<p>All valid household members are reported for correct benefit determination</p>

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6. - CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

<p>Describe if and how the State used existing government systems and databases to verify applicant or household member identities in FY2010 and continuing in FY2011. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)</p>	<p>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY2011.</p>	<p>If the State won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the State will supplement this fraud prevention strategy.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>During FY/10 the SSN numbers were not verified, as the program was unaware of a system in place.</p>	<p>Having access to a data base where this information can now be verified. It will be implemented at the onset of FY/11. The Liheap Policy & Procedure's now include Using the database to verify all</p>		<p>Use of all available database systems to make sound eligibility determination.</p>

SSN# for all household members listed. This policy is effective for FY/11.

7. - VERIFYING APPLICANT INCOME

Describe how the State or designee used State Directories of new hires or similar systems to confirm income eligibility in FY2010 and continuing in FY2011.

Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY2011.

If the State won't be using new hire directories to verify applicant and household member incomes how will the State be verifying the that information?

Necessary outcomes from these systems and strategies

As a result of the 3 audit findings we will no longer accept check stubs or any other document other than a payroll record from the employer or the last IRS Tax Filing for sub-contactors. Verified Payroll income must be in the form of a Payroll Statement from the Employer. For Household members 18 years of age and over, they must provide a statement from General assistance regarding any payment they have received during the last 12 months. Other members 18 and over must name specific jobs they have had within the last 12 months. This information can be easily verified by Employers.

Due to the peer review structure of our dept, any application that does not provide all sources of income and new hires will be held ineligible pending the proper documentation.

If the State won't be using new hire directories to verify applicant and household member incomes how will the State be verifying the that information?

Effective income determination achieved through coordination across program lines.

8. - PRIVACY-PROTECTION AND CONFIDENTIALITY

<p>Describe the financial and operating controls in place in FY2010 that will continue in FY2011 to protect client information against improper use or disclosure.</p>	<p>Please highlight any controls or strategies from your plan which will be newly implemented as of FY2011.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All client files are kept in a locked cabinet in a locked storage room outside of the public area. Files are not to be left out in the open at any time during the workday.</p>	<p>This policy has been in effect for several years without and privacy issues rising</p>	<p>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.</p>	<p>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</p>

