

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

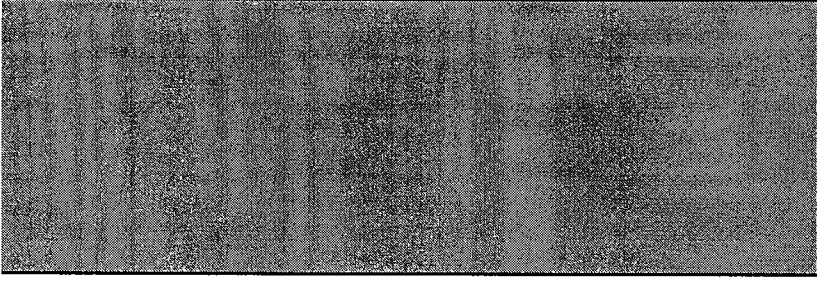
ABSTRACT:

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.

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| State, Tribe or Territory (and grant official): Quileute Indian Tribe | Date/Fiscal Year: August 27, 2010/ FY2011 |
| 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 |

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| <p>The Tribe completes annual audits under the Single Audit Act requirement. LIHEAP funding and expenditures do not meet the minimum requirements for inclusion in annual audits.</p> <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p> | | | <p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit</i></p> |
| <p>COMPLIANCE MONITORING</p> | | | |
| <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>The Tribe has conducted an informal review by the Chief Financial Officer in conjunction with the Acting Human Services Director of process and procedures to verify documentation and calculation of eligibility, payments to vendors and recordkeeping.</p> <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference</i></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>Compliance with LIHEAP Policy and Procedure is verified through periodic financial reviews conducted jointly by the CFO and Human Services management.</p> | <p><i>A sound methodology with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p> |

excerpts from relevant policy documents



FRAUD REPORTING MECHANISMS

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| <p>For FY2010 activities continuing in FY2011, 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 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>Fraud can be reported via telephone, email or in writing to our Human Services Department, Personnel Office or to the Tribal Office. Any reports are documented and delivered to the Tribal Council or law enforcement as deemed appropriate for investigation and response.</p> <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p> | <p>Beginning in FY 2011, the Quileute Tribe will implement an advertising strategy that includes announcements in the local newsletter, fliers and brochures. This information will educate the public on the definition of fraud and the mechanisms available for reporting fraud.</p> | <p>Current mechanisms to prevent fraud or improper payments include use of the Tribal Assistance System (TAS) database for documentation and calculation of eligibility and payments to vendors. Payments are not approved or processed without TAS documentation.</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> |

VERIFYING APPLICANT IDENTITIES

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| <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 LIHEAP Program requires adult identification and proof of Tribal enrollment to verify identity. Applications include a section for social security numbers. * please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</p> | <p>Beginning in FY 2011, social security numbers will be verified.</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 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>The Tribe requests social security numbers for all household members on the application for assistance.</p> | <p>Beginning in 2011, the Tribe will require listing of a social security number on the application. In previous years, inclusion of the social security</p> | | <p>All valid household members are reported for correct benefit determination.</p> |

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| <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p> | <p>number has been optional.</p> | |
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| CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES | | |
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| <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><i>Use of all available database systems to make sound eligibility determination.</i></p> |
| <p>The Tribe currently has a data share agreement with the State of Washington for access to ACES database. We also verify enrollment with the Tribal Enrollment Officer.</p> <p><i>* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents</i></p> | <p>Newly implemented will be inclusion of LIHEAP on the Data Share Agreement with the State of Washington for LIHEAP Coordinator access to ACES. FY 2011 will be the year in which the agreement is amended, which could take a significant portion of the fiscal year to be accomplished.</p> | |
| VERIFYING APPLICANT INCOME | | |

