

ATTACHMENT 5

WYOMING PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT FY 2012

Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

HHS is requiring further detail from Grantees on their FY2012 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2012 plan which represent improvements or changes to the Grantees' FY2011 plan for preventing and detecting fraud, abuse and improper payment prevention.

State, Tribe or Territory (and grant official): State of Wyoming, Department of Family Services	Date/Fiscal Year: 2012
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RECENT AUDIT FINDINGS

Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2011 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 FY2012.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
<i>There have been no audit findings reported in the prior three (3) years.</i>	There are no findings to correct.	N/A	Wyoming has plans & strategies in place to ensure continued positive audit results.

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.

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COMPLIANCE MONITORING			
Describe the Grantee's FY 2011 strategies that will continue in FY 2012 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 2012.	If you don't have a firm compliance monitoring system in place for FY 2011, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<p><i>During the FY 2011 season, Wyoming randomly selected and reviewed 1.4% of total client files and will continue to increase this percentage to a goal of 5% of total client files per season. This shows a steady increase since FY 2010. Wyoming has added a customer comment card for LIEAP to our Dept. website. Wyoming will also continually work to increase the quality assurance requirements from sub-recipients (contractors). Contractor is required to review 100% of completed client files for accuracy. Contract staff is provided with LIEAP Desk Reference Manuals that include all policy and rules. State Program Manager may also make on-site visits to the Contractor's location as part of compliance monitoring. Sub-recipient contractor is expected to hire qualified staff to each specific job description and to hold them accountable to the required perf. measures. Accuracy in both data entry and the verification process is a high priority and the expectation is that sub-recipient contractor(s) diligently work to achieve 100% accuracy. Written performance appraisals are required for all LIEAP staff (State & sub-recipient levels).</i></p>	<p>Continue to increase percentage of client files reviewed towards achieving a goal of 5% of total files per season. Wyoming will also continually work to increase the quality assurance requirements from sub-recipients (contractors).</p>	<p>N/A</p>	<p>Outcomes = increased assurance that LIEAP policy and procedures are being followed; increased accuracy.</p>

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FRAUD REPORTING MECHANISMS			
<p>For FY 2011 activities continuing in FY 2012, 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 2012, 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>Reports of possible fraud are received from various sources. These may include phone call reports from a person; reports from local authorities; reports from fuel vendors just to name a few. When reports of possible fraud are received, pertinent evidence is gathered. We have a unit within the Financial Services Division of our Department that handles possible issues of fraud. Prosecution, Recovery, Investigation, Collection Enforcement (PRICE) has the authority and responsibility under W.S. 42-2-112 to prosecute and pursue repayment of benefits paid incorrectly by DFS to or on behalf of a recipient(s), whether caused by the recipient, the provider or the agency.</p>	<p>There are no changes to our Plan for FY2012 as the process we have in place works well. We do have another reporting mechanism, however, with the addition of the website comment card. The LIEAP application includes: "I declare that the information given by me in this application is true and correct. I understand the penalty for providing false information shall be no more than a \$15,000 fine, or not more than 5 years imprisonment or both." Applicants must initial this declaration and sign and date the application.</p>	<p>N/A</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>

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VERIFYING APPLICANT IDENTITIES			
Describe all FY 2011 Grantee policies continuing in FY2012 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 2012.	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>Applicant & HH member identities are verified by requiring all applicants and HH members to submit copies of original SS cards, birth certificates, Valid Driver's Licenses, Valid Passports, School records or Health Insurance Cards. Applications may not be processed without proper verification of identifications. Illegible copies are not acceptable.</p>	<p>In FY 2012, Wyoming will continue verifying identification as per FY 2011. Applications submitted without legible, acceptable copies of identification verification, as per State LIEAP policy, will be pended and/or denied until acceptable forms of identification are submitted.</p>	<p>N/A</p>	<p>Outcome = ensuring that LIEAP benefits are provided to eligible clients.</p>
SOCIAL SECURITY NUMBER REQUESTS			
Describe the Grantee's FY 2012 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 FY2012, 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>Wyoming encourages applicants and all HH members to provide SSNs by including it on the application and approximately 80% of all applicants do voluntarily supply the SSNs on the applications. However, Wyoming does not require SSNs as part of eligibility.</p>	<p>For FY 2012, Wyoming's policy on requiring SSNs shall remain the same. Changing this requirement would require Rule Changes which cannot be completed in time for the FY 2012 season. Wyoming will research the possibility of requiring SSNs.</p>	<p>Wyoming requires that all applicants and HH members submit legible, approved copies of identification verification to ensure validity of all HH members reported on the application.</p>	<p><i>All valid household members are reported for correct benefit determination.</i></p>

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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 2011 and continuing in FY 2012. (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 2012.	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
Wyoming does not currently cross-check social security numbers against other government systems/databases. This has not been a requirement of the Department of Health and Human Services (DHHS).	Wyoming will not be implementing anything new in this area for FY 2011. We will await guidance from DHHS.	Wyoming's current method of requiring approved and legible verification documents from all applicants and HH members before an application may be approved for benefits ensures that sound eligibility determinations are made. Our LIEAP computer system will not allow benefits to be approved without all verifications first being loaded into the system.	<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 2011 and continuing in FY 2012.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2012.	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
Wyoming requires applicants to submit current verification of all income sources for all HH members receiving income. For employment, 3 consecutive, current paystubs must be submitted. If paystubs not available, employer must complete a DFS Employer Statement Form verifying income. For SS benefits, Wyoming requires current SS benefit letters to verify SS income. For a full listing of acceptable forms of income verification, please see attached policy excerpts re: income verification. Applications	There are no plans to implement new strategies in FY 2012.	Wyoming verifies income for all applicants and HH members by requiring legible approved current copies of income verification documents.	<i>Effective income determination achieved through coordination across program lines.</i>

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<p>submitted without acceptable verification of income will be pended and/or denied until acceptable income verification is submitted per State LIEAP policy.</p>			
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<p>PRIVACY-PROTECTION AND CONFIDENTIALITY</p>			
<p>Describe the financial and operating controls in place in FY 2011 that will continue in FY 2012 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 FY 2012.</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>Anyone having access to client information in our databases must sign our Security and Confidentiality Acknowledgement Form prior to being granted access to our systems. This is also used with Contract staff. All new users must complete the mandatory Confidentiality Agreement and End User Form. After a user account is configured, that account is given specific application access through the Citrix Server. "All software application access is managed through a robust, state-of-the-art Citrix server, that acts as a web-server and first line security device. Citrix server is built to control remote access with encrypted connections and sits behind the State's DMZ."</p>	<p>No changes for FY 2012.</p>	<p>N/A</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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LIHEAP BENEFITS POLICY			
Describe FY 2011 Grantee policies continuing in FY 2012 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 2012.	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>Wyoming requires all fuel vendors to re-register with the State each year. State LIHEAP policy states: "Fuel suppliers shall abide with the Statement of Assurances for Home Energy Suppliers, which LIHEAP mails to fuel suppliers on a yearly basis...." Fuel suppliers must also complete a WOLFS 109 form prior to the beginning of each season. All WOLFS 109 and Statement of Assurances are verified prior to re-opening or opening a fuel suppliers' account for payment processing. See attached State LIHEAP policy for detailed policy re: payment of LIHEAP benefits to fuel suppliers on behalf of eligible clients.</p>	<p>No new implementations in FY 2012.</p>	<p>N/A</p>	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

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PROCEDURES FOR UNREGULATED ENERGY VENDORS			
Describe the Grantee's FY 2011 procedures continuing in FY 2012 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.	Please highlight any strategies policy in this area which will be newly implemented in FY 2012.	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
Wyoming uses the same procedure for non-regulated fuel providers as for regulated fuel providers. Additionally, for some types of Crisis assistance, Wyoming requires that a Crisis Pre-Authorization Form be completed first and sent to the fuel vendor prior to approval. There is a form for both regulated and non-regulated.	No changes for FY 2012.	N/A	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2011 policies continuing in FY 2012 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 2012.	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
Wyoming requires all fuel vendors to re-register with the State each year. State LIEAP policy states: "Fuel suppliers shall abide with the Statement of Assurances for Home Energy Suppliers, which LIEAP mails to fuel suppliers on a yearly basis...." Fuel suppliers must also complete a WOLFS 109 form prior to the beginning of each season. All WOLFS 109 and Statement of Assurances are verified prior to re-opening or opening a fuel suppliers' account for payment processing.	No changes for FY 2012.	N/A	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

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TRAINING AND TECHNICAL ASSISTANCE			
In regards to fraud prevention, please describe elements of your FY 2011 plan continuing in FY 2012 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 2012.	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
The issue of fraud prevention has been included in our application materials, and has been included in training as it pertains to eligibility verifications.	As part of our FY2012 training, we are including a stand-alone segment on fraud prevention. This training will be provided to Contractor staff, State staff, and fuel vendors.	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 2011 that will continue into FY 2012.	Please describe new policies or strategies to be implemented in FY 2012.	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
Wyoming has to follow the A-133 Audit requirements.	No change for FY 2012.	Wyoming follows the A-133 Audit requirements.	<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>

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Additional Information

See attached supporting documents:

1. Client Case File Audit Report Form (2 pages)
2. Excerpt from Wyoming LIEAP Policy re: eligibility verification (10 pages)
3. DFS Employer's Statement Form (2 pages)
4. Security & Confidentiality Acknowledgement Form (2 pages)
5. New Hire/Termination End User Form (1 page)
6. Excerpt from Wyoming LIEAP Policy re: payment & fuel supplier responsibilities (4 pages)
7. Excerpt from Wyoming LIEAP Policy re: monitoring, computer security, & confidentiality (1 page)