ATTACHMENT 5

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):Mississippi Band of Choctaw Indians, Choctaw MS			**Date/Fiscal Year: 08/21/13 FY 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 had no finding of material weakness relative to the LIHEAP program.	There were no finding to be addressed during the previous FY	*The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.*

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 Department of Family and Community Services has a Compliance Officer to review policy activities in the LIHEAP Program. In addition the Tribe has an internal auditor available to audit all financial activities in addition to the external audit firm. These control efforts have been in place for several years and will continue through 2014	The Tribe will continue the present monitoring efforts through 2014	*A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.*

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 of these strategies and systems**
	All present fraud reporting avenues will remain available in 2014. Reports can be submitted directly to the director of the Department and or the Tribal Attorney General and or the Tribal Internal Auditor. The LIHEAP coordinator visits all 8 Tribal communities to advise community members about the program and to inform them about fraud reporting. The telephone numbers for all entities who can receive reports are available through the Tribal switchboard.	The LIHEAP Coordinator will continue with her annual visits to each of the 8 Tribal communities to inform them of how to report fraud. The contact points available to them and what might constitute fraud.	*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.*

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**
	Plan will remain consistent with the 2013 plan for verifying applicants	All applicants continue to be required to provide several forms of identification including photo ID, Social Security Information, proof of residence, etc. This includes verification of credentials with the Office of Tribal Enrollment and a review of utility bills and tax receipts	*Income and energy supplier data that allow program benefits to be provided to eligible individuals.*

SOCIAL SECURITY NUMBER REQUESTS			
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**
	Social Security numbers continue to be required by Tribal Policy	N/A	*All valid household members are reported for correct benefit determination.*

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**
	As a Native American Tribe we only cross check data base information with information on file for all Tribal Members	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**
	The Tribe requires income verification by using check stubs and or bank statements	The Tribe does not have access to new hire directories	*Effective income determination achieved through coordination across program lines.*

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**
	All employees receive training on maintaining confidentiality. All confidential information is kept in locked filing cabinets	This strategy will continue to be used during FY 2014	*Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.*

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**
	The Tribe uses Purchase Orders for each payment to a vendor. The Purchase Order contains the name of the beneficiary Tribal Member. In addition this information is kept in a computerized record system. All Purchase orders require 3 signatures and review by accountant	This process will be continued in 2014	*Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.*

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 un-regulated 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**
	The Tribe uses only state licensed and regulated fuel dealers	The Tribe will continue this policy in 2014	*Participating vendors are thoroughly researched and inspected before benefits are issued.*

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**
	Should any new vendors be added to our list of qualified vendors their licensing status will be verified with the appropriate state agency	This policy will continue in 2014	*An effective process that effectively confirms the existence of entities receiving federal funds.*

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**
	The Tribe will continue the on-going policy of providing training to all LIHEAP caseworkers to help insure that they detect, report and prevent potential cases of fraud	This strategy will continue in FY 2014	*The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.*

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**
	The Tribal Government submits all government accounting operations to a full annual audit which includes the LIHEAP Program. In addition the Tribal Internal Auditor is available to examine any immediate questions of fraud.	As a Tribal Government entity the LIHEAP program will continue to be subject to all audit requirements of Tribal Government during FY 2014	*Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.*

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.

Question #3

The mechanisms available to the public for reporting cases of suspected LIHEAP fraud include:

The LIHEAP Coordinator visits all 8 tribal communities to share information on how to contact her office either for assistance or to report suspected fraud or abuse.

The LIHEAP Assistance office has a telephone number available through the Tribal Telephone Switchboard and reports of fraud can be submitted by phone.

The Tribe has a web site that contains the telephone numbers for the LIHEAP office and individuals can send anonymous emails to the website to report suspected cases of fraud, waste or abuse.

The Tribe has a Division of Public Safety and Law Enforcement with a Criminal Investigation Unit that is available to take complaints of fraud or misuse. In addition they are available to conduct investigations.

The Tribe has an internal auditor who is available to conduct investigations of fraud, waste or abuse. This office can also receive complaints.

Question 4

Verifying Applicants Identities

The LIHEAP Coordinator is available to review all applications taken by her staff. As a part of that review process the Coordinator has available to her the Office of Tribal Enrollment which maintains a current enrollment status record on all tribal members. The Coordinator will ask for a copy of a State issued Drivers License, or a State issued Photo Identification card, in addition the Coordinator will ask for a copy of utility bills or tax receipts to verify the recipients address. In addition the Coordinator will ask for the CDIB (Certified Degree of Indian Blood) card which can be checked against the Tribal Enrollment Records. The Coordinator also request Social

Security identification information and checks it against the data base to match it with the address to insure that the applicant is not applying from two or more places of residence.