

ATTACHMENT 5
PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT
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): KIOWA TRIBE OF OKLAHOMA		Date/Fiscal Year: 8/28/2013	
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
There were no audit findings on federal awards for the fiscal year ending June 30, 2013. The final report disclosed no instances of non-compliance or other matters that were required to be reported under Gov't. auditing standards.	The Tribe will continue to comply with all Single Audit Act requirements and address any findings in a timely manner.	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

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 Tribe is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<p>Every LIHEAP application is reviewed for completeness per federal LIHEAP policies, before approval. In addition, the Tribe has a Compliance Officer that reviews all payment vouchers to ensure that the documentation supports the payment request, before any payment is made.</p> <p>Each year the application itself is revised to ensure that its requirements are clearly stated and the applicant understands all LIHEAP requirements.</p>	<p>The Tribe will continue with internal control procedures thru the LIHEAP program itself, as well as compliance office review of all supporting documentation before any LIHEAP applications are processed for payment.</p>	<p>See explanation as stated in column one of this section.</p>	<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

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
<p>A and B- Tribal members and the general public are able to report any suspected fraud, waste, or abuse by calling a toll-free number that has been published in the tribal newsletter, displayed on the bulletin board of the main tribal complex next to the time clocks, as well as the Social Services bldg. itself. This number is also noted on the tribes website.</p>	<p>Publication of the '<i>Fraud, Waste, and Abuse of LIHEAP funds</i>' policy will continue to be published in all tribal media resources. A prominent warning notice regarding fraud, waste, or abuse of LIHEAP funds will also continue to be included in the FY2014 application that must be read & signed by every applicant.</p>	<p>The Tribes LIHEAP program will continue to use our current methods of public notification.</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			
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>Since the Kiowa Tribe administers the LIHEAP program we only accept applications from <u>enrolled tribal members</u>. Verification of an applicant's identity can also be confirmed through our tribal enrollment office. For any LIHEAP application we receive, the head of household and/or applicant, <u>MUST</u> be an enrolled tribal member and submit a copy of their CDIB (Certificate of Degree of Indian Blood/tribal enrollment card). Each application also requires a secondary form of identity such as a state issued driver's license, a state issued ID, or a social security card. All supporting documentation must be included with the application BEFORE an application is considered complete and can be processed for payment.</p>	<p>Current procedures will remain intact. In instances where fraud is suspected, such as additional members in a household not being reported on an application, LIHEAP staff is able to make unannounced home visits to verify any portion of an application. Every applicant must sign the Fraud Statement that is included on the front page of each application. By signing this, the applicant grants us the authority to <u>verify any portion of their application</u>, which can include a home visit to verify residency and total household members, employment status, etc.,</p>	<p>As stated in column one of this section- only verified tribal members are eligible to receive LIHEAP assistance thru the Kiowa Tribe.</p>	<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>
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
<p>The requirement for providing Social Security numbers for <u>every household member included on the LIHEAP application</u> is clearly stated on the application itself. Any missing information makes an application 'incomplete' and we will not process the application until all information is provided.</p>	<p>Will remain the same.</p>	<p>N/A, our program requires Social Security numbers on all applications.</p>	<p><i>All valid household members are reported for correct benefit determination.</i></p>

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES			
<p>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.)</p>	<p>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The Tribe does not have access to any government or state databases to verify identities. However, since all LIHEAP applicants must be enrolled tribal members, verification of identity can be positively identified through the tribal enrollment office. We also cross check all Social Security numbers listed on the application over the age of (18) years, with the Department of Human Services in the applicant's county of residence. Additionally, any household member listed on the application that is over the age of (18) years, <u>and are not enrolled Kiowa but enrolled with another area Tribe,</u> will require us to verify with that particular persons Tribe of enrollment to see if they used LIHEAP with that specific Tribe.</p>	<p>No change in current policies.</p>	<p>All tribal LIHEAP applicants are required to provide a secondary form of identification that may include a state driver's license, a state I.D. or Medicaid card. A letter from the Social Security Administration verifying an on-going case with the applicant, such as an SSI or disability claim.</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>
VERIFYING APPLICANT INCOME			
<p>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.</p>	<p>Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.</p>	<p>If the Grantee won't be using new hire directories to verify applicant and household member incomes how will the Grantee be verifying that information?</p>	<p>Necessary outcomes from these systems and strategies</p>

<p>Tribes are not required to report employment data to the State and do not currently have access to state directories or databases at this time. However, the LIHEAP application requires each applicant to submit verification of income. If this is not provided, the application will be denied. Additionally, if an applicant has no income- then a 'Verification of No Income' form for each household member over the age of (18) years must be provided. If not provided, the application can be denied or placed on hold until documentation is provided.</p>	<p>No new 'New Hire' policies have been developed. The Tribe will continue to use the current system of verifying reliable sources (housing authorities, current landlord, previous employer, DHS, etc..) when necessary.</p>	<p>Verification of income may be documented by providing a copy of the applicants most recent or last pay stub, if employed. An award letter from Social Security, Veterans Affairs, etc., will also be accepted as valid proof of income. Applicants with no income are required to submit the 'Verification of No Income' form with their LIHEAP application. Documentation must be provided for any type of income.</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></p>
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<p>PRIVACY-PROTECTION AND CONFIDENTIALITY</p>			
<p>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.</p>	<p>Please highlight any controls or strategies from your plan which will be newly implemented as of FY 2014.</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 applications containing sensitive applicant information are stored in locked filing cabinets. Access to these files is limited to authorized personnel only with keys to the cabinets stored in a secure location. In addition, the Tribes Financial Management System (FMS) includes regulations for the internal control of documents. Any classified information, including old or outdated files, are shredded once they become outdated. All Social Services/LIHEAP staff, have signed a 'Confidentiality Agreement' that prohibits the disclosure of confidential client information. This form is placed in every employee file. Any violations of this Agreement could result in immediate termination of employment.</p>	<p>No new controls have been established for FY2014 and every effort will be made to maintain the confidentiality of all client records stored within the Social Services building.</p>	<p>See column one in this section for explanation.</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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 a 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>All LIHEAP applicants must provide an actual bill from their utility company. This certifies the name and address of the applicant who is applying for utility assistance from that particular provider. Payment is always made directly to the utility vendor. No payment for utility assistance is ever given directly to an applicant.</p>	<p>Revised fraud policies were implemented beginning with the FY 2012 application process and will continue for future years. All LIHEAP applicants must now sign the 'Fraud and Compliance Statement' listed on the front of each application, which states that they have read and understand the LIHEAP application requirements.</p>	<p>Sometimes when verifying if an applicant has received LIHEAP through another source (generally their county of residence or through another Tribe that administers LIHEAP) we discover that a LIHEAP payment has already been made on their behalf or someone who resides in the same household. In these instances, we notify the applicant that their application has been denied.</p> <p>If we discover after the fact that a LIHEAP payment has already been made by another agency on their behalf, we ask the vendor to return that check to us and stop payment.</p>	<p>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</p>

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>The Tribe has not had any applicants requesting assistance to purchase wood. All propane dealers in our service area understand that unless we notify them by fax with a formal approval letter, that our LIHEAP program is not obligated to pay them without prior approval. Currently we do not have any fuel vendors that are not licensed with the state of OK.</p>	<p>Beginning with FY2014, the Kiowa Tribe will notify all propane dealers located within our specific service area that we are not obligated to make payments for any individuals that have not been formally approved for LIHEAP assistance. We will send a fax or letter to each propane company and have them sign and return back to us that they understand that the Tribe is</p>	<p>Explanation as stated in column two of this section.</p>	<p>Participating vendors are thoroughly researched and inspected before benefits are issued.</p>

	<p>not obligated to pay for an individual's propane bill if they have not had prior approval from the LIHEAP program. In all instances, it is the program who will contact the propane company directly with a confirmation fax or a phone call, confirming that an individual has been approved for LIHEAP assistance for a specific dollar amount. Individuals who have propane delivered without prior approval will be denied payment.</p>	
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VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

<p>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.</p>	<p>Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY 2014.</p>	<p>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?</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>To my knowledge, we currently do not have any utility vendors that are not licensed by the state. The larger utility companies already have existing LIHEAP agreements with the State of Oklahoma.</p>	<p>No changes at this time.</p>	<p>Since the Kiowa Tribe is located in a rural area, there are a limited amount of utility providers in our region. Most have been in business for at least 30+ years or more, and are licensed by the State.</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>
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<p>Social Services and LIHEAP staff are updated at the beginning of each new fiscal year on any major changes to the Tribes LIHEAP program. A brief update on any new changes for the upcoming year is provided to all staff through the program director. Any changes to the LIHEAP application process is generally made before the beginning of each new fiscal year- Oct. 1st. All other interested parties (finance, compliance, LIHEAP applicants, and energy vendors) will be informed of any new changes thru the tribal newsletter, or thru a flyer located at the tribal LIHEAP office, and thru the tribal website as a news article.</p>	<p>As stated in column one, Social Services and LIHEAP staff are trained in-house on any new LIHEAP guidelines before each new fiscal year begins. Staff are confident that the systems currently in place are working as a direct result of lessons learned from previous years.</p>	<p>Explained in columns 1 and 2.</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>
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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>
<p>The tribe fully complies with the Single Audit Act requirements and is current on all program audits.</p>	<p>Policies will remain the same.</p>	<p>The Tribe continues to comply with the Single Audit Act requirements and is current on all program audits.</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

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.