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): LUMBEE TRIBE OF NORTH CAROLINA			**Date/Fiscal Year:** 08-30-2013
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 have been no audit findings of material weakness, reportable conditions, questionable costs, or other financial audit findings reported in 2013 for Tribal LIHEAP. Tribal LIHEAP complies with the Single Audit Act, and is audited internally by S. Preston Douglas and Associates.	In the FY2014 the Lumbee Tribe of North Carolina will continue to follow the Model Plan and detailed business plan that is specific to only the Lumbee Tribe of North Carolina.	Due to no audit or fiscal findings there is no plan or correction to be implemented.	*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 Lumbee Tribe of North Carolina will continue for 2014 *the* strategies implemented in 2013. *The Compliance Specialist will be responsible for monitoring and ensuring case compliance for all Tribal and Federal LIHEAP policies. In addition, the Compliance Specialist will daily review all cases upon approval/denial to ensure the required information, records and documents needed to prepare a complete application for assessment of eligibility are included in the file. The Compliance Specialist will ensure that all LIHEAP policies and procedures are followed and that each application is in compliance.*	The Lumbee Tribe of North Carolina will implement a compliance plan for intake specialists. The LIHEAP manager will create a detailed step-by-step guide and detailed checklist to insure all information needed is collected from the client. This additional review process will decrease the potential for oversight.	The Lumbee Tribe of North Carolina will follow its current monitoring system with additional compliance measures for Intake Specialists	*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**

A. *American Indians in the Tribal Territory, served by the Lumbee Tribe of North Carolina, are advised of the policies concerning fraud at the time of application. Clients are encouraged to inform any administrative member of the Lumbee Tribe of North Carolina of any suspected fraud, waste, or abuse of LIHEAP funds. Contact information for the tribal administration can be found on the website at www.lumbeetribe.com. Applicants are informed the Tribe has a toll-free number to report suspected fraud, 1-800-659-6585.* B. *American Indians in the Tribal Territory are informed of fraud policies at the time of application. Community meetings are held on a monthly basis and information on fraud and reporting suspected fraud are given to those attending.*	The Lumbee Tribe of North Carolina will continue to operate in compliance with its current fraud policy. The policy and procedure for fraud prevention will be well documented so that all parties (clients, vendors, employees, and the public) understand their rights and responsibilities. Suspected fraud and credible complaints of fraud will be investigated for credibility. Confirmed	The Lumbee Tribe of North Carolina will follow its plan with additional compliance measures for Intake Specialists. Flyers will be posted in tribal facilities to notify the public of the procedures to report suspected 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.*

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**
The Lumbee Tribe of North Carolina used and will continue to use the North Carolina State Department of Health and Human Services' government system and database. This system allowed cross-checking across the Tribal system and the State system.	The Tribe does not have any new plans to use any different government databases for 2014.	The Lumbe Tribe of North Carolina has a current plan in place.	*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 Lumbee Tribe of North Carolina used WIRM, an online verification system maintained by DHHS of North Carolina to verify income in FY 2013. This system provides proof of social security, SSI, unemployment, and proof of employment.	The Lumbee Tribe of North Carolina will continue to use WIRM as it has proved to be sufficient in FY2013.	The Lumbee Tribe of North Carolina has a current plan in place.	*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**
The Lumbee Tribe of North Carolina *ensures client information is kept confidential, by maintaining files in locked file cabinets. LIHEAP staff is trained in HIPPA guidelines and the Privacy Act.* *Financial policies ensure that payments are not approved and made by the same people. Payments are mailed to the Vendor from the Finance Department.*	The strategies for maintaining client information have been sufficient for FY 2013 and will continue to be used in FY 2014.	The Lumbee Tribe of North Carolina has a current plan in place and has been sufficient to protect client information and privacy.	*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 Tribal Finance Department of the Lumbee Tribe of North Carolina is responsible for all payments to vendors. The Department of Energy Compliance Specialist verifies that all information Is accurate before a request for payment is submitted, which will also be re-verified by the Tribal Finance Department before final processing.	The Intake Specialist will be responsible for contacting the energy vendor to confirm the energy source. The service address will also be verified. This will insure all information is accurate and verified before submitting a request for payment to the Tribal Finance Department.	The Lumbee Tribe of North Carolina has a current plan in place.	*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 Lumbee Tribe of North Carolina uses a Home Energy Supplier Agreement to ensure vendors do not treat clients adversely. This agreement ensures funds paid on behalf of the client are properly applied to the client's account to alleviate a heating or cooling emergency. Vendors must agree to accept payment and apply to the applicant's account in the amount approved by the tribal caseworker.	The Intake Specialist will verify service address before payment is made.	The Lumbee Tribe of North Carolina has a current plan in place with improvements to avert fraud.	*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**
The Lumbee Tribe of North Carolina uses a vendor agreement that must be completed. This form requests: name, address, IRS Tax ID#, social security #, etc. This agreement entered into with the Tribe assures that the Vendor is legitimate and qualified to deliver the desired energy source.	The Lumbee Tribe of North Carolina will ensure Vendors are not on the debarment list to avoid fraudulent payments.	North Carolina has a plan in place with improvements to prevent fraudulent vendors from receiving payments.	*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 Lumbee Tribe of North Carolina LIHEAP staff receives *annual training each year. The training session includes, updated policy procedures, eligibility requirements, guidelines, and fraud detection. Annual system training will be available for system updates and policy changes.*	There are no new training implementations at this time.	There is a plan in place.	*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**
In FY2014 the Lumbee Tribe of North Carolina will be subject to the tribal monitoring process that is conducted by an outside audit agency.	There are no new policies at this time.	The Lumbee Tribe of North Carolina has a current plan in place.	*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.

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- COMPLIANCE MONITORING & CHECKLIST
- FRAUD DISCLOSURE
- VENDOR AGREEMENT
- NOTICE OF RIGHTS