

**ATTACHMENT 1
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): <p align="center">NEZ PERCE TRIBE OF IDAHO</p>	Date/Fiscal Year: 2014 JULY 30, 2013
RECENT AUDIT FINDINGS	
<i>No audit finding of material weaknesses and reportable conditions or questioned costs in prior 3 years</i>	Non cited: will continue operating at same level

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

Checks and balances are in place when requesting payments to vendors, both at eligibility determination and financial accountability. Eligibility is checked and verified. Vendors are public utilities and W9's are required for small businesses. Check with utilities on applicants past payment record and help from other agencies.

Have always check with vendor on clients past payment record and help with other agencies, but not reported on last integrity report.

FRAUD REPORTING MECHANISMS

Tribal Newspaper, will carry fraud reporting numbers also with other information about LIHEAP Program. Applications as well show the fraud statement and penalties, with phone number and fax. Post eligibility and fraud information in public places.

Posting fraud information in public places.

VERIFYING APPLICANT IDENTITIES

The LIHEAP program serves only eligible enrolled members of the Nez Perce Tribe and other Federal recognized Tribes living on the Nez Perce Reservation. Tribal picture ID's is the first requirement. Also require SSN energy bill in applicants name.

If applicant is unknown to Liheap staff or other Social Services Staff, inquiries will be made to the applicants Tribe for further identification. This was always done in the past but not identified in last integrity report.

SOCIAL SECURITY NUMBER REQUESTS

Require SSN for Adult Household members.

Remain the same

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

<p><i>There is no access to State or Government systems data base</i></p>	<p>Unknown</p>	<p>Through local entities to verify employment such as Tribal Enterprises and local businesses. Tribal enrollment office requires stringent verification for eligibility such as ancestral records, paternity proof, sworn statement, etc.</p>
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VERIFYING APPLICANT INCOME

<p><i>State new hires directories are not available to the Nez Perce Tribe, nor are they used by the local department of labor.</i></p>	<p>Not available</p>	<p>Income verification is required by pay documentation, ssi or ss award letters for adult household members. Tribal enterprises and local employers and Tribal Employment Rights Program verify employments. Also, statement of no income is required stating reasons.</p>
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PRIVACY-PROTECTION AND CONFIDENTIALITY

Department follows the Privacy Act and employees sign a confidentiality statement. Release of information is obtained from client for information research. Confidentiality Training is held yearly by the Tribe.

None needed.

LIHEAP BENEFITS POLICY

Utility vendors are regulated utilities. Wood and oil vendors must have a w-9 and in place with accounting department before payment is made. Payment is made after client receives wood.

Procedures have been satisfactory

PROCEDURES FOR UNREGULATED ENERGY VENDORS

Same as above. Payment is not made until wood is delivered and proper tax and W-9 is in place. Out of the household served an estimated number of 3 households use vendors that are not public utilities.

Procedures have been satisfactory

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

Same as above. Wood Vendors are certified through the Tribal Forestry Department

Follow up checks on wood delivery.

TRAINING AND TECHNICAL ASSISTANCE

<p><i>Technical assistance from governmental staff is always available. LIHEAP Conference is a tool for sharing with other Tribes. Liheap is administered by one coordinator with one support staff who both have been employed many years and are responsible to the Social Services Manager.</i></p>	<p>Webinars are useful tool and staff have been participating. Input from other Tribes at question periods is beneficial.</p>	
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AUDITS OF LOCAL ADMINISTERING AGENCIES

<p><i>LIHEAP Program funds are audited every FY by outside entity as required by the Single Audit Act.</i></p>	<p>None are needed.</p>	
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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.

RESOLUTION

WHEREAS, the Nez Perce Tribal Executive Committee has been empowered to act for and on behalf of the Nez Perce Tribe, pursuant to the Revised Constitution and By-Laws adopted by the General Council of the Nez Perce Tribe, on May 6, 1961 and approve by the Acting Commissioner of Indian Affairs on June 27, 1961; and

WHEREAS, the Nez Perce Tribe is eligible for direct funding under the Omnibus Budget Reconciliation Act of 1982; and

WHEREAS, the Nez Perce Tribe intends to apply for Low Income Home Energy Assistance direct funding.

NOW, THEREFORE, BE IT RESOLVED, that the Nez Perce Tribal Executive Committee (NPTEC) hereby approves the application for the Low Income Home Energy Assistance Program with the amount to be determined by the Office of Health and Human Services, for Fiscal Year 2014; and

BE IT FURTHER RESOLVED, that the NPTEC Chairman and Secretary are hereby authorized to negotiate and execute this grant, any modifications thereto and any re-contract thereof, unless otherwise amended or rescinded by proper committee action; and

BE IT FINALLY RESOLVED, that the Nez Perce Tribe's Social Services Department is hereby authorized to administer the Low Income Home Energy Assistance Program and the NPTEC Treasurer is authorized to disburse funds accordingly.

CERTIFICATION

The foregoing resolution was duly adopted by the Nez Perce Tribal Executive Committee meeting in regular session, August 13, 2013 in the Richard A. Halfmoon Council Chambers, Lapwai, Idaho, a quorum of its members being present and voting.

By: *Anthony D. Johnson*
Anthony D. Johnson, Secretary

Attest:


Silas C. Whitman, Chairman