OMB Approval No. 0970-0075, Expiration Date: 04/30/2014

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): Poarch Band of Creek Indians			**Date/Fiscal Year: 08/26/13 FY2014**
RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable co ditions, 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**
These findings listed below are a result of the internal departmental audit within the Family Services Department and have not been identified in any external audit for the Tribe as a whole. During FY2013, one (1) administrative error was discovered in August, 2013. The discrepancy was identified by the Community Services Program when the client came in for additional services. The application had been approved in error for two disbursements from the Summer LIHEAP program. Three (3) additional cases were also discovered in August 2013 to have	The case involving the administrative error was resolved by using tribal funds to pay back the LIHEAP program to rectify the error. Both of the other cases are in the process of resolution. In case A.: A letter was sent to the client outlining the discovery of the information regarding the household income discrepancy and detailing the amount the client must pay back. The client responded in a timely manner and has acknowledged her failure to		*The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.*

provided false information on the LIHEAP applications. This was discovered when these clients came in for other services within the Family Services Department. A. One (1) case involved the client leaving out information about her household income for both Winter LIHEAP and Summer LIHEAP. The client listed this income when applying for another program within the Family Services Department and the additional information showed this household was ineligible to receive LIHEAP services. This information was shared by cross-referencing internally to assess what services the client had used this year from the Family Services Department. B. Another client listed that her husband was not working in both her 2013 Winter and 2013 Summer LIHEAP applications. The client applied for another program with the Family Services Department and provided documentation showing her husband was employed throughout this year. This information was again discovered by internally cross-referencing what services the client had received this year from the Family Services Department. C. The other case involved a client not listing her husband as a member of her household for both 2013 Winter LIHEAP and 2013 Summer LIHEAP. She also did not include any information about his income. She did list him in an application when applying for another program within the Family Services Department and indicated he had been in her home and had been gainfully employed throughout 2013. She had indicated in her LIHEAP applications that she was not married. This was also information gained by internally cross-referencing what services the client had received this year within the Family Services Department.	report accurately the household income. The Tribe has an internal process through which repayment will be garnished to repay the LIHEAP program. This case has been transferred to the Tribal Government Department to begin this process. Resolution of this case is anticipated to occur mid-January, 2014. In both cases B and C: Letters detailing these discrepancies have been sent to these clients and they have not yet responded. These letters provide the clients with a ten day window to return this information to us with verifying their household constitution and income. If these clients do not provide this information by September 6, 2013, these cases will be turned over to the Tribe's Legal Department for legal proceedings to begin to ascertain the needed verifications and repayments of grant funds if appropriate.		

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
All LIHEAP applications are reviewed prior to case approval by the Director or senior staff holding signature authority and knowledge of the LIHEAP program. Further review by the Director or senior staff is completed prior to the completion of the purchase order providing payment for the client's bill. These procedures will continue to FY 2014. The tribal fiscal process for approving payments has multiple levels which are other means for reviewing award payments and monitoring compliance with Federal regulations.	The Family Services Department will continue with the current Program Integrity Plan during FY 2014. The Family Services Department is anticipating the implementation of a new data tracking system, CRM, pending final approval by the Tribal Council. The CRM program will enable us to cross-reference all information the clients provide in all of the program areas within the Family Services Department. We anticipate this will enhance our ability to prevent fraud and will enhance our data collection abilities in general.		*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

The Family Services Department accepts all reports of fraud. Reports are documented and the case files are pulled for review. If there are discrepancies, the household are contacted to resolve the reports. Notification of the reporting process for fraud is listed each month in the monthly Poarch Creek Newsletter that is sent to each tribal member head of household's home.	The Family Services Department will utilize the Poarch Creek Indian's website, twitter account, and Facebook Account to provide the reporting process for fraud and suspected fraud.	The Family Services Department is engaged in the process of working to enhance our collaboration with the providers of LIHEAP services within Alabama and Florida to prevent duplication of services. At this time we do not have a methodology for sharing this information. Many of the providers are aware of the Tribe's program and will refer PBCI tribal members to our services to prevent duplication of services.	***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
Tribal households are identified through a unique tribal ID card containing their certified tribal roll number. This photo ID is available to all tribal members. If they do not have this ID card, the Tribe's Member Benefits Department will provide a letter verifying the client's certified tribal roll number. This enrollment number is specific to the tribal member and becomes the case number for the household that is applying for LIHEAP services.	Copies of all tribal ID cards or verification letters are made and kept in the client's folder as a record of physical identification and tribal membership. This practice will continue for FY2014. If the Tribal Council gives final authorization to the implementation of the CRM data system, a copy of the tribal ID Card or verification letter will be scanned in to the client's digital file.		*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
The Family Services Department requires all applicants to provide copies of Social Security cards for all household members. If a household member does not have a Social Security card, the client is given information about obtaining a card and their case is considered incomplete until a Social Security card is presented or a statement from the Social Security office listing the Social Security number is provided. The Tribe's Education Department provides computers and will aide clients in completing an application to receive a Social Security card on-line.	This will remain the same for FY2014.		*All valid household members are reported for correct benefit determination.*

[redacted]

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 fo 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 descri e how the Grantee will supplement this fraud prevention strategy.**	**Necessary outcomes from these systems and strategies**
The Tribe does not have access to external federal, state, or county databases to cross check social security numbers. The Tribe does not have an internal system to cross check social security numbers with internal sources. A long-term goal of the CRM program is to enable this type of cross-referencing between all tribal programs to occur but that is unlikely to occur within FY2014.		The internal collection and keeping copies of the Social Security cards and tribal ID information in the client files starting in FY2012 has enabled the Family Services Department to further verify the client's reported information. This information is reviewed each time a client applies for services and is our fraud prevention strategy. The implementation of the CRM program, if final approval is given by Tribal Council, will also provide an internal cross-referencing for all programs offered within the Family Service Department, and in the future across all tribal departments.	*Use of all available database systems to make sound eligibility determination.*

VERIFYING APPLICANT INCOME			
De cribe 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 does not have access to the State's new hire directory or a similar system to confirm income eligibility for the State of Alabama or the State of Florida.	The Tribe will not be verifying this information from new hire directories.	Any applicant for LIHEAP services must provide the Family Services Department with verification of earned and unearned income sources for their household. Those clients or household members of a client who are not employed and who are nineteen (19) or older must provide a third-party	*Effective income determination achieved through coordination across program lines.*

		statement regarding non-employment.	

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 case files are locked in file cabinet inside a secure office area. Access to general office staff is allowed on a need-to-know basis. As the Family Services Department administering the LIHEAP Program is small, most of the Departmental staff is involved in the LIHEAP application process. All tribal employees must sign a confidentiality form upon hire. The disclosure of confidential information is strictly prohibited and can result in the termination of employment should an employee violate client confidentiality. This serves as a protection of information when processing purchases to pay energy bills.	Client files are kept in a numerical system thus protecting any personal identifying information from being displayed. This procedure will remain in place FY2014.		*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
Authorized payments are rendered to vendors upon receipt of a client's bill which must the client's address and account number, itemization of services being billed for, the current amount due, and the vendor's address and identifying information. LIHEAP services are only offered within the Tribe's designated six-county service area. If the client's bill is in another individual's name, such as	On-going participation in the Community Action Program serving the four-county service area in Alabama is essential to ensure tribal members are referred to the Family Services Department for LIHEAP services. Efforts will be made to make connections with the Community Action Programs in Escambia County, Florida and in Montgomery County, Alabama.	Internal fiscal policy provides multiple levels of approval and quality checks. The Award's Letter provides the client with written documentation they can share with providers to let them know what funds have been approved to pay on their energy bill. Vendors will contact clients and clients will contact the Family Services Department if payments are not received by the providers.	*Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.*

in a land-lords name, the client must provide written documentation verifying they are responsible for said bill. The Family Services Department actively engages the client, the vendor, and any other listed person in ascertaining verification that the client is responsible for their bill.			

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**
Authorized payments are rendered to vendors upon receipt of a client's bill. The bill must contain the client's address and account number, an itemization of the services being billed for, the current amount due, and the vendor's address and identifying information. If the client's bill is in another individual's name, such as in a land-lords name, the client must provide written documentation verifying they are responsible for said bill. The Family Services Department actively engages the client, the vendor, and any other listed person in ascertaining verification that the client is responsible for their bill. If a bill appears to be inflated or not consistent with current rates in our area, the Family Services Department actively seeks to verify the bill amount to determine if potential fraud or improper billing is occurring.	The process will remain the same for FY2014.		*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**

All LIHEAP recipients must provide a current bill containing the identifying information for the vendor including their name, contact phone number, and address. The Family Services staff is familiar with the energy providers in our service area and the departmental staff makes frequent contact with vendors to verify the status of client accounts. It is not uncommon for vendors to also contact the Family Services staff to provide verification of payments received and to report concerns regarding client accounts.	The process will remain the same for FY2014.		*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**

Internal LIHEAP training is provided by the Director and Community Services Coordinator to all Family Services staff on an ongoing basis as new procedures are made or changed to meet federal regulations and caseload demands. Technical Assistance is provided by the Region IV Grant Specialist as requested. The Community Services Coordinator and the Director participate in all webinar trainings from ACF.	LIHEAP training will be scheduled with all departmental staff during September, 2013, and as needed, to discuss changes, including the findings from any monitoring reviews. This will be planned as an ongoing process. Fraud prevention is an ongoing issue within all of the Family Services Department's program areas and active efforts are being made to discover, eliminate, and prevent fraud by internal cross-referencing of information obtaining during intake processes. The potential of implementing CRM will certainly enhance our cross-referencing abilities and improve our capacity to prevent fraud. If CRM is implemented, all departmental staff will be trained in data entry and cross-referencing of cases.		*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 Tribe consistently follows the modified accrual basis of accounting principles as applicable to governmental units. Under the modified accrual basis of accounting, revenues are recognized when the related goods and services are accomplished. This is in accordance with established procurement policies adopted by the Tribal Council which are consistent with the requirement so OMB circular A-102. The procurement policy requires a Purchase Order System that is	Audits will continue as described.		*Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.*

closed-ended and provides a clear audit trail of all transactions.			

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.

Attachment – page 7

Poarch Creek Indian

Tribal Council Resolution

TCR 2013-081

RESOLUTION TO APPROVE FY 2014 GRANT APPLICATION FOR THE LOW INCOME HEAT AND ENERGY ASSISTANCE GRANT (LIHEAP)

WHEREAS, the Poarch Band of Creek Indians is a federally recognized Tribe organized pursuant to 25 C.F.R. Part 83;

WHEREAS, the Tribal Council is authorized to transact business on behalf of the Tribe and to appropriate and distribute resources needed to conduct the necessary activities and functions of a Tribal government;

WHEREAS, on April 4, 2013, the Office of Administration for Children and Families published its FY 2014 grant announcement for the Low Income Heat and Energy Assistance Grant, hereafter referred as "LIHEAP";

WHEREAS, the LIHEAP Program provides funding to provide energy related services to all eligible households within the Tribal Service Area, which is legally defined as Escambia County, AL; Baldwin County, AL; Mobile County, AL; Monroe County, AL; and Escambia County, FL;

WHEREAS, the Family Services Department currently administers the FY 2013 LIHEAP grant and has successfully demonstrated the capacity to carry out the goals and objectives under its program guidelines;

WHEREAS, the Tribal Administration and Family Services Department request Tribal Council's approval to submit a grant application for FY 2014; and

WHEREAS, the Tribal Council desires to continue services offered through the LIHEAP grant opportunity.

NOW THEREFORE BE IT RESOLVED, that the Tribal Council hereby approves the submission of a FY 2014 LIHEAP grant application; and

BE IT FURTHER RESOLVED, that the Tribal Council hereby authorizes the Tribal Chairman to represent the Tribe in the execution of all documents related to the submission of the FY 2014 LIHEAP grant application and directs the Tribal Administrator and Family Services Director to continue the administration of the grant

APPROVAL

I, the Chairman of the Poarch Band of Creek Indians, hereby affix my signature to this resolution authorizing it to become official this 22nd day of August, 2013.

Buford L. Rolin
Tribal Chairman

CERTIFICATION

I, the Secretary of the Poarch Band of Creek Indians, certify that the foregoing is a true extract from the minutes of the "Special Called" Tribal Council meeting of the Poarch Band of Creek Indians, comprised of nine members with 8 in attendance on the 22nd day of August, 2013, and that the above is in conformity with the provisions therein adopted by a vote of 7 in favor, 0 against, and 0 abstentions.

David W. Gehman, Secretary
Poarch Band of Creek Indians

OMB Approval No. 0920-0428

CERTIFICATIONS

1. CERTIFICATION REGARDING DEBARMENT AND SUSPENSION

The undersigned (authorized official signing for the applicant organization) certifies to the best of his or her knowledge and belief, that the applicant, defined as the primary participant in accordance with 45 CFR Part 76, and its principals:

(a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal Department or agency;

(b) have not within a 3-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and

(d) have not within a 3-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

Should the applicant not be able to provide this certification, an explanation as to why should be placed after the assurances page in the application package.

The applicant agrees by submitting this proposal that it will include, without modification, the clause titled "Certification Regarding Debarment, Suspension, In eligibility, and Voluntary Exclusion--Lower Tier Covered Transactions" in all lower tier covered transactions (i.e., transactions with sub- grantees and/or contractors) and in all solicitations for lower tier covered transactions in accordance with 45 CFR Part 76.

2. CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

The undersigned (authorized official signing for the applicant organization) certifies that the applicant will, or will continue to, provide a drug-free workplace in accordance with 45 CFR Part 76 by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dis-pensing, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about--
  (1) The dangers of drug abuse in the workplace;
  (2) The grantee's policy of maintaining a drug-free workplace;
  (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a) above;

(d) Notifying the employee in the statement required by paragraph (a), above, that, as a condition of employment under the grant, the employee will--
  (1) Abide by the terms of the statement; and
  (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central

point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d) (2), with respect to any employee who is so convicted--

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

For purposes of paragraph (e) regarding agency notification of criminal drug convictions, the DHHS has designated the following central point for receipt of such notices:

Office of Grants and Acquisition Management
Office of Grants Management
Office of the Assistant Secretary for Management and Budget
Department of Health and Human Services
200 Independence Avenue, S.W., Room 517-D
Washington, D.C. 20201

3. CERTIFICATION REGARDING LOBBYING

Title 31, United States Code, Section 1352, entitled "Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions," generally prohibits recipients of Federal grants and cooperative agreements from using Federal (appropriated) funds for lobbying the Executive or Legislative Branches of the Federal Government in connection with a SPECIFIC grant or cooperative agreement. Section 1352 also requires that each person who requests or receives a Federal grant or cooperative agreement must disclose lobbying undertaken with non-Federal (non-appropriated) funds. These requirements apply to grants and cooperative agreements EXCEEDING $100,000 in total costs (45 CFR Part 93).

The undersigned (authorized official signing for the applicant organization) certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. (If needed, Standard Form-LLL, "Disclosure of Lobbying Activities," its instructions, and continuation sheet are included at the end of this application form.)

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

4. CERTIFICATION REGARDING PROGRAM FRAUD CIVIL REMEDIES ACT (PFCRA)

The undersigned (authorized official signing for the applicant organization) certifies that the statements herein are true, complete, and accurate to the best of his or her knowledge, and that he or she is aware that any false, fictitious, or fraudulent statements or claims may subject him or her to criminal, civil, or administrative penalties. The undersigned agrees that the applicant organization will comply with the Public Health Service terms and conditions of award if a grant is awarded as a result of this application.

5. CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103-227, also known as the Pro-Children Act of 1994 (Act), requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, early childhood development services, education or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law also applies to children's services that are provided in indoor facilities that are constructed, operated, or maintained with such Federal funds. The law does not apply to children's services provided in private residence, portions of facilities used for inpatient drug or alcohol treatment, service providers whose sole source of applicable Federal funds is Medicare or Medicaid, or facilities where WIC coupons are redeemed.

Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to $1,000 for each violation and/or the imposition of an administrative compliance order on the responsible entity.

By signing the certification, the undersigned certifies that the applicant organization will comply with the requirements of the Act and will not allow smoking within any portion of any indoor facility used for the provision of services for children as defined by the Act.

The applicant organization agrees that it will require that the language of this certification be included in any subawards which contain provisions for children's services and that all subrecipients shall certify accordingly.

The Public Health Services strongly encourages all grant recipients to provide a smoke-free workplace and promote the non-use of tobacco products. This is consistent with the PHS mission to protect and advance the physical an mental health of the American people.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Bagord L. Rolin	TribaL Chairman
APPLICANT ORGANIZATION	DATE SUBMITTED
Poarch Band of Creek Indians	08-28-13

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Buford L. Rolin

Signature
Buford L. Rolin

Title
Chairman

Organization

Poarch Band of Creek Indians

Public Notice

This article provide public notice to all Tribal Members that the following grants will be available for review, discussion, and public comment during office hours at the Family Services Department, Building 500, during the weeks of May 20 – June 7, 2013.

Low Income Energy Assistance Grant (LIHEAP)
Community Services Block Grant (CSBG)
Child Care Development Funds (CCDF)

2013 Summer L.I.H.E.A.P. program is continuing through June and will end on July 31, 2013.

- **If your household received** the 2013 Winter L.I.H.E.A.P. services, please bring your current bill to the Family Services Department. You will need to complete a one-page application and leave your bill with the Department. **You will not need to make an appointment!**
- **If your household did not receive services** through the 2013 Winter L.I.H.E.A.P. program, you will need to schedule an appointment with the Community Services program to determine your eligibility for the L.I.H.E.A.P. program. You can schedule an appointment by calling the Family Services Department at (251)-368-9136, ext. 2600.

Special Thank You

A special Thank You to all those who helped make the Family Service's Stopping Abuse, Assault and Violence Identification and Prevention Conference such a success!!

If you suspect fraud, waste, or abuse in any of the Community Services Programs (LIHEAP, Community Services Block Grant, Child Care, or the Tribal Assistance or Crisis Funds, please contact the Family Services Department at (251)-368-9136, ext. 2600.

If you or a loved one is a victim of domestic violence, please contact Michealine Deese for assistance or information. You can reach Michealine at (251)-368-9136, ext. 2600, or via e-mail at mdeese@pci-nsn.gov. You are not alone. We are here to help you.

Stop the Violence ❖ Prevent Abuse

The Family Services Department * 5811 Jack Springs Rd. * Atmore, AL 36502
Phone: (251)-368-9136, ext. 2600 Fax: (251)-368-0828