

**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): <b>Eastern Shawnee Tribe of Oklahoma</b>		Date/Fiscal Year: <b>2014</b>	
<b>RECENT AUDIT FINDINGS</b>			
<b>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.</b>	<b>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.</b>	<b>If there is no plan in place, please explain why not.</b>	<b>Necessary outcomes from these systems and strategies</b>
<i>There were no audit findings of material weaknesses, reportable conditions, questionable costs, or other findings during the A-133 audit of LIHEAP Financials</i>	<b>Not Applicable</b>	<b>Not Applicable</b>	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

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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.

<b>COMPLIANCE MONITORING</b>			
<b>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.</b>	<b>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY 2014.</b>	<b>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.</b>	<b>Necessary outcomes from these systems and strategies</b>
<i>The program officer reviews expenditures on a monthly basis to ensure that funds are appropriately expended. The Tribal accounting office will perform a semi-annual review of client files to ensure eligibility.</i>	Not Applicable	Not Applicable	<i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i>

<b>FRAUD REPORTING MECHANISMS</b>			
<b>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.</b>	<b>Please highlight any tools or mechanisms from your plan which will be newly implemented in FY 2014, and the timeline for that implementation.</b>	<b>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.</b>	<b>Necessary outcomes of these strategies and systems</b>
<i>a. There is a complaint policy in which problems that employees and clients believe may be happening, including alleged case of fraud, waste, abuse may be reported to the appropriate Tribal officials that have oversight Responsibilities for the program. If necessary, the officials will refer the situation to the Tribal police officer in charge of investigation who will then follow enforcement protocols. b. The procedure is included in the employee handbook and is also available at the tribal complex for the public.</i>	Not Applicable	Not Applicable	<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>

**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
<i>The tribe verifies applicant and spouse identities by either contacting the Tribal enrollment officer to check the Tribal database. If Tribal enrollment is not verifiable, the project officer may request to view another form of government issued photo identification.</i>	Not Applicable	Not Applicable	<i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i>

**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
<i>The Tribe requires applicants to provide social security numbers for all household members on the application.</i>	Not Applicable	Not Applicable	<i>All valid household members are reported for correct benefit determination.</i>

<b>CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES</b>			
<p><b>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.)</b></p>	<p><b>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2014.</b></p>	<p><b>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.</b></p>	<p><b>Necessary outcomes from these systems and strategies</b></p>
<p><i>The Tribe verifies applicant and spouse identities by either contacting the Tribal Enrollment officer to check the Tribal Enrollment database. If tribal enrollment is not verifiable, the project officer may request to view another form of government issued photo identification.</i></p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>
<p><b>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.</b></p>	<p><b>Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.</b></p>	<p><b>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?</b></p>	<p><b>Necessary outcomes from these systems and strategies</b></p>
<p><i>Applicant are required to submit their prior year 1040 as well as current year income details including wage stubs, check stubs ledgers, etc. The project officer reviews the documents that were turned in and makes an eligibility determination based on the information provided.</i></p>			<p><i>Effective income determination achieved through coordination across program lines.</i></p>

<b>PRIVACY-PROTECTION AND CONFIDENTIALITY</b>			
<b>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.</b>	<b>Please highlight any controls or strategies from your plan which will be newly implemented as of FY 2014.</b>	<b>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.</b>	<b>Necessary outcomes from these systems and strategies</b>
<i>Client information is stored securely with individuals that determine program eligibility. Financial information is password protected and payment invoices are stored securely.</i>	Not Applicable	Not Applicable	<i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i>

<b>LIHEAP BENEFITS POLICY</b>			
<b>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.</b>	<b>Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY 2014.</b>	<b>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.</b>	<b>Necessary outcomes from these systems and strategies</b>
<i>The Tribe required a copy of the most recent energy bill, as well as any other correspondence relating to that particular account and made payment to the utility vendor.</i>	Not Applicable	Not Applicable	<i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients</i>

<b>PROCEDURES FOR UNREGULATED ENERGY VENDORS</b>			
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
<i>If the vendor is not recognizable as a major supplier in this area, the Tribe will make inquiries prior to issuing payment in order to determine that the vendor is reputable using any of the following methods: Telephone verification, on-site inspection, internet searches, better business bureau referrals, etc.</i>	Not Applicable	Not Applicable	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>

<b>VERIFYING THE AUTHENTICITY OF ENERGY VENDORS</b>			
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
<i>The majority of energy payments are made to regulated energy utility companies that are widely recognized. In the event that a vendor is not recognizable as a major supplier, the project officer will make inquiries to determine that the vendor is reputable using any of the following methods. Telephone verification, on-site inspection, internet searches, better business bureau referrals, etc.</i>  <i>verification of the vendor will take place prior to issuing payment.</i>	Not Applicable	Not Applicable	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

<b>TRAINING AND TECHNICAL ASSISTANCE</b>			
<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>
<p>a. Employees may attend continuing education classes provided that the classes are necessary, reasonable, within budget, and have proper approval b. N/A c. Clients may request that the project officers assist in completing the necessary application. d. N/A</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</p>
<b>AUDITS OF LOCAL ADMINISTERING AGENCIES</b>			
<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 is the administering agency, and is subject to an A-133 compliance audit.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</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.