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

**ATTACHMENTS 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):NEW YORK ST. REGIS MOHAWK TRIBE**

**Date/Fiscal Year: 2014**

**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**

*Audit was done the week of April 8,2013 and no discrepancy found*

N/A

N/A

*Thetjriiejyand thorough resolution of weaknesses or reportable conditions tis revegjed btythe audit*

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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.

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| **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** |
| *Monitoring checks to see that the program is doing what the tribe said it would do in its Liheap application. Monitoring looks at the program as it operating to see if the program is being run efficiently, and is in compliance with approved Liheap plan, law and regulations.* | Check with accounting department to see that correct payments are made timely and that there are checks and balances in the financial system. Results from monitoring can be used to design a more effective program year. | **N/A** | *A sound methodology, with a schedule for regular monitoring and a more effective monitorihg tool to gather information.* |

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| **FRAUD REPORTING MECHANISMS** |
| **For FY 2013 activities continuing** |  |  |  |
| **in FY 2014, please describe all (a)** |  | **If you don't have any tools or** |  |
| **mechanisms available to the** | **Please highlight any tools or** | **mechanisms available to the** |  |
| **public for reporting cases of** | **mechanisms from your plan** | **public to prevent fraud or** | **Necessary outcomes of these strategies and systems** |
| **suspected LIHEAP fraud, waste or** | **which will be newly** | **improper payments, please** |
| **abuse [These may include** | **implemented in FY 2014, and** | **describe your plan for involving** |
| **telephone hotlines, websites,** | **the timeline for that** | **all citizens and stakeholders** |
| **email addresses, etc.]; (b)** | **implementation.** | **; Involved with your program in** |  |
| **strategies for advertising these** |  | **detecting fraud.** |  |
| **resources.** |  |  |  |
| *If someone is receiving benefits* |  | We are familiar with all our | *Clear lines of* |
| *and has lied about any of the* |  | clients through our tribal | *communication for* |
| *following:* | Beginning with startup program | enrollment book. We have a | *citizens, grantees,* |
| *Income or assets* | in November 2013, a poster | good working relationship with | *clients, and employees* |
| *Town or city where they live* | outside our office telling how to | our vendors, so we make sure | *to use in pointing out* |
| *Their identity* | report fraud and numbers that | we have no duplications on | *potential cases of* |
| *Who is living in their house* | they can call. | payments and if one is detected | *fraud or improper* |
| *This can be report to our office or* |  | we are notify immediately by | *payments to State* |
| *compliance office.* |  | phone call or email. | *administrators.* |

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**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 FY20i4.**

**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**

*Liheap has always required that household members each year submit social security cards on all household members, Tribal ID cards, Birth certificate, Drivers license.*

All supporting documents must be included with the application before a payment can be processed through the Liheap office.

We have a tribal enrollment book that verifies all tribal members.

*Income dhd energy supplier data that allowprogram 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, of 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**

*AH applicants must provide social security cards for all household members. If they do not have a card we give them a form to fill out. Letting them know that the second Tuesday of every month a representative from Social Security Administration comes to the Tribal building to take applications.*

We will continue to require all household members to provide their tribal cards.

Through tribal cards, birth certificates and driver license

*All valid household members are reported for correct benefit determination.*

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**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 FY2014.**

**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**

*Through office of the Aging, the Department of Social Services in Franklin and St Lawrence county.*

**N/A**

We are familiar with all our clients because they are all tribal enrolled members. With all members that come into our office, we can verify social security numbers with that person. We have a Tribal enrollment book in our office to verify residence and membership.

*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**

*A majority of employment on our reservation is within the Tribal government and its subsidiaries. We request paystubsfor the last four weeks of income from employers, letters of determination from federal agencies, printout from the state office. A written statement of net income from self employed person. A statement of how the person's basic needs are met with no income.*

N/A

We can verify income through our payroll department and by contacting employers on our reservation

*Effective income determination achieved through coordination across programlines.*

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**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**

*Client's files are kept in a locked filing cabinet and doors are locked when staff leaves the building. Client name or other identifiable information is not shared with outside parties without a release of information or verbal permission by client to release to that party. Names on check request are not sent to accounting.*

**N/A**

**N/A**

*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**

**Necessary outcomes from these systems and strategies**

*The majority of our vendors that work with our programs are local. Benefits that are issued to the clients are done by fax or over the phone. We work very closely with vendors on a daily bases to check on payments to see that there are no duplications or over issuance.*

**Collect account data from vendors. Make sure that funds not used by household, e.g., if the household moves, are returned by the vendor to the tribe.**

**N/A**

*Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.*

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**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 utinties.**

**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**

*Our tribe prefers formal written agreement so there is less chance for misunderstanding about what each is required to do. Any vendor that doesn't comply they are not allowed on the reservation.*

**N/A**

**N/A**

*Participating vendors are thoroughly'^researched arid inspected before benefits are issued.*

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| --- | --- | --- |
| **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** |
| *Through our compliance officer a negotiated rate with energy supplier and the tribe is established before deliveries can be made.* | **All vendors must be register with the tribe before any services can be done. The majorities of the vendors that are utilized in this area are local and have been well established for many years.** | **N/A** | *An effective process that effectiv€l\^conflrrnsthe exi&nceofenWes receiving federal funds.* |

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**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) non­governmental 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**

***Our training and technical assistance is provided every year before start-up by NYS. Also, by Office of Community Service(OCS) Liheap Grantee Training meeting.***

N/A

Our program is very small. Two employees administer Liheap program that handle client information, applications, and eligibility. Both of us have been a part of our community for many years.

Our population that we serve is smaller and local, we are aware of each client's situation. This helps in fraud prevention.

***Thetimelyand 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**

***An independent auditor is hired annually to audit the Liheap program along with other tribal programs.***

We are audited yearly, and this will continue.

N/A

***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.