

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 their 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):			Date/Fiscal Year:
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
<p><i>Auditors found one over payment and one underpayment in FY2010. The under payment was due to a manual computation error. The over payment was due to human error (the eligibility worker failed to include all of the income listed on the application in the computation determining the benefit level).</i></p> <p><i>Auditors found no findings in FY2011</i></p> <p><i>Auditors found no findings in</i></p>	<p><i>Auditors found that this finding in FY2010 was resolved in FY2011 in addition to having no findings in FY2012. Program staff have been directed to use the LIHEAP data software program only, to compute benefit levels (no manual computation).</i></p> <p><i>All case files are reviewed prior to authorizing heating assistance payment to household by either the Work Assistant Director or another</i></p>	<p>N/A</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

FY2012	LIHEAP staff who has not processed the application		
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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.

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
<p><i>The Client Development Director, who has been administering the TCC LIHEAP for the past 30 years, samples applications received on a monthly basis to test for program compliance with state and federal statutes, regulations current program instructions.</i></p> <p>All case files are reviewed prior to authorizing heating assistance payment to household by either the Work Assistant Director or another LIHEAP staff who has not processed the application.</p> <p>All LIHEAP supervisory and administrative support staff will receive a minimum of four hours of training from the Client Development Director (or designee) regarding the compliance parameters of state and federal program rules and regulations and jointly participate in the monthly monitoring activities of the Client Development Director (or</p>	N/A	N/A	<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

designee). Test sample case files will be jointly reviewed by the full contingent of LIHEAP program staff.

FRAUD REPORTING MECHANISMS

<p>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.</p>	<p>Please highlight any tools or mechanisms from your plan which will be newly implemented in FY 2014, and the timeline for that implementation.</p>	<p>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.</p>	<p>Necessary outcomes of these strategies and systems</p>
<p><i>(a) TCC maintains a toll free 1.800 telephone hot line available for to the public to report fraud. E-mail address available to report fraud located on TCC website.</i></p> <p><i>(b) Poster is mailed out to each Tribal Council and Post Office listing the 1.800 telephone hot line to report fraud and email address. TCC Website will have contact information listed as well.</i></p>	<p>Email address to report fraud located on the TCC website</p>	<p>N/A</p>	<p><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></p>

VERIFYING APPLICANT IDENTITIES

<p>Describe all FY 2013 Grantee policies continuing in FY2014 for how identities of applicants and household members are verified.</p>	<p>Please highlight any policy or strategy from your plan which will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
			<p><i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i></p>

SOCIAL SECURITY NUMBER REQUESTS

<p>Describe the Grantee's FY 2014 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</p>	<p>Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2014, or remaining the same.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>TCC employs, locally-based Tribal Workforce Development Specialists(TWDS) and Tribal Family/Youth Specialists (TFYS) in each of the 37 isolated/rural communities served by the TCC LIHEAP who review and sign each completed application submitted locally and certify information regarding applicant identity and household composition along with ensuring all household members have their social security number documented on the application.</i></p>	<p>Remaining the same.</p>	<p>N/A</p>	<p><i>All valid household members are reported for correct benefit determination.</i></p>

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

<p>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.)</p>	<p>Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>TCC's LIHEAP program is administered within its Client Development division which also administers Tribal TANF, General Assistance, Child Care Assistance, Employment and Training, Education and Vocational Training and Head Start programs which all document applicant/participant household income to determine eligibility. These programs share data regarding Household composition and verified income documentation on file. An electronic data interface allowing access to Unemployment Compensation systems and public assistance systems is now available from the state of Alaska through a separate agreement. Allowing LIHEAP staff to verify SSN with other state data base systems and with TCC internal data base systems that operate TANF, General Assistance and Child Care programs.</p>	<p>N/A</p>	<p>N/A</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>

VERIFYING APPLICANT INCOME

<p>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.</p>	<p>Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.</p>	<p>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?</p>	<p>Necessary outcomes from these systems and strategies</p>

TCC has access to the state of Alaska, External Information System (EIS) and utilizes the system to verify income for persons included in their system. TCC has access to the Department of Labor data base were verification of current or previous employment may be viewed along with verifying if anyone in the household may be getting unemployment benefits.

N/A

N/A

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
<p><i>As part of the application process, applicants sign a release of information for the sole purpose of determining eligibility.</i></p> <p><i>TCC Personnel Policies (which include all accounting and program staff) prohibit the disclosure of confidential information [resulting in immediate termination from employment.]</i></p> <p><i>TCC manual filing systems and accounting and program data storage software include the following; locking cabinet storage and firewall and user security protections to safeguard unauthorized access</i></p>	N/A	N/A	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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
<p><i>TCC maintains Accounting: The Tanana Chiefs Conference has an automated accounting system. The accounting format utilized by Tanana Chiefs Conference has been approved by State and federal auditors as meeting all criteria to comply with State and federal grants and contract reporting requirements.</i></p> <p><i>Monitoring: The TCC automated accounting system and program reports also allows the LIHEAP grant to be monitored regularly for accuracy. The Tanana Chiefs</i></p>	N/A	N/A	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

Conference staff will make every effort to see that the program is delivered in compliance within the regulations of LIHEAP by conducting monthly random samples of applications paid and testing them for accuracy, compliance and fraud.

Audit: An independent audit is a standard procedure of Tanana Chiefs Conference accounting system. As part of the audit, a random sample of applications from the households served will be reviewed to assure eligibility and proper payment dispersal. The use and involvement of local tribal council staff provides Tanana Chiefs Conference with readily available feedback as to the application process and any problems that might develop in the delivery of services. The participation of locally-based tribal staff allows Tanana Chiefs Conference to correct errors expeditiously and to effectively respond to reports of fraud.

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 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>TCC maintains a toll free 1 800 Hot Line for the public to report vendor fraud. TCC program staff with randomly audit 10% of all fuel vendors during the program year. Audit shall include proof of receipt indicating the quantity of all fuels delivered.</i>	N/A	N/A	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>

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
<p><i>All private business vendors are required to have a current, state of Alaska business license and submit a completed W-9 form.</i></p> <p>All private business vendors will be required to provide documentation of their current, state of Alaska business license as an attachment to their vendor contract.</p>	N/A	N/A	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

TRAINING AND TECHNICAL ASSISTANCE

<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><i>(a) LIHEAP on-site staff receive hands on anti-fraud training by the program director using the program operations manual where step by step instructions are given on how fraud cases are identified. An internal spreadsheet documents the fraud finding and the action taken. Off-site Tribal Workforce Development Specialist are provided with instructions via teleconference on how the application needs to be completed along with information on what the program requirements are, what fraud is and how to prevent fraud.</i></p> <p><i>(b) Non-governmental staff involved in the eligibility process- None</i></p> <p><i>(c) Each year clients are mailed out Energy Assistance Application (Attachment F) the cover letter along with the application itself includes a section that warns the client against fraud and the penalties that will be imposed.</i></p> <p><i>(d) Each year vendors are mailed out new vendor agreement (Attachment B) included in the cover provides the vendor the 1-800 hot line to report fraud.</i></p>	<p>N/A</p>	<p>N/A</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

AUDITS OF LOCAL ADMINISTERING AGENCIES

<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><i>Accounting: The Tanana Chiefs Conference has an automated accounting system. The accounting format utilized by Tanana Chiefs Conference has been approved by State and federal auditors as meeting all criteria to comply with State and federal grants and contract reporting requirements.</i></p> <p><i>Audit: An independent audit is a standard procedure of Tanana Chiefs Conference accounting system. As part of the audit, a random sample of applications from the households served will be reviewed to assure eligibility and proper payment dispersal.</i></p> <p><i>The use and involvement of local tribal council staff provides Tanana Chiefs Conference with readily available feedback as to the application process and any problems that might develop in the delivery of services. The participation of locally-based tribal staff allows Tanana Chiefs Conference to correct errors expeditiously and to effectively respond to reports of fraud.</i></p> <p><i>The Tanana Chiefs Conference L.I.H.E.A.P. is audited annually for fiscal and program compliance.</i></p>	<p>N/A</p>	<p>N/A</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>