Developing Tribal LIHEAP Programs

Guidance for New Coordinators

June 12, 2012

NEUAC Session 4F
Objectives

- General announcements
- Web Resources
- Understanding Key Rules:
  - Administrative Costs
  - Carryover Report
  - Payment Matrix
  - Program Integrity
General Announcements
Background

• ACF administers the Low Income Home Energy Assistance Program (LIHEAP) at the Federal level

• ACF funds a total of more than 200 LIHEAP grantees which include State, Tribes and Tribal Organizations, and U.S. Territories
  – Of this, approximately 150 LIHEAP grantees are Tribes

• LIHEAP is funded on an annual basis. Congress issues funding to ACF after October 1st. The timing and amount of funding varies each year.

• Funding is made available upon receipt of a complete LIHEAP Plan each year. LIHEAP Plans are due to ACF no later than September 1.

• Plans should be submitted by email to: LIHEAPsubmissions@acf.hhs.gov

• Reports for the prior year must be received to receive funding the next year. These include the Carryover and Reallotment Report and the Household Report.
General Reminders

• **Tribal Contacts:** Notify ACF as soon as possible if your Tribal LIHEAP coordinator changes. We need their full contact information to follow-up about funding and other issues.

• **Extensions:** Meet due dates when applying for funds and submitting reports. If you think you can’t, request an extension in writing to ACF and your State before the deadline.

• **One-on-one ACF Assistance:** Contact your ACF liaison for technical assistance.

• **ACF Guidance:** Check the LIHEAP website often for new guidance, forms, and announcements (especially AT’s, IM’s, and Dear Colleague Letters). We also send these by email to the LIHEAP coordinator.

• **Resources:** Download copies of the LIHEAP Tribal Manual and the LIHEAP statute and regulations from the LIHEAP website.
Web Resources
Office of Community Services
Division of Energy Assistance

LIHEAP Web Site

Includes Information Memoranda (IMs), and Action Transmittals (ATs), the statute, regulations, ACF contacts, forms, and program information:

LIHEAP Clearinghouse website collects, develops, organizes and disseminates information on low-income home energy issues (including Tribe’s LIHEAP Plans): http://liheap.ncat.org/
Administrative Costs

Definition, Cap Maximum and Percentage Calculations
All LIHEAP grantees are required to develop their own definition of “administrative costs” and must track these costs throughout the year.

Your Tribe must also have a definition for what is an “obligation” and an “expenditure”. The LIHEAP statute requires that 90% of LIHEAP funds be obligated within the Federal Fiscal Year (FFY) in which the LIHEAP award is made by ACF and the remaining 10% be obligated by the following FFY.

Ideally, these should be written in your Tribe’s own policy and procedures manual for LIHEAP.

You may choose to adopt a definition of administrative costs based on a definition from a similar public assistance program, such as TANF.

See Section I of the ACF LIHEAP Tribal Manual for more information.
Administrative Costs Cap Maximums

• Tribes/Territories with allotments over $20,000 can use $4,000, plus 10% of the total LIHEAP funds payable after subtracting the first $20,000 of LIHEAP funds

• Tribes/Territories with allotments of $20,000 or less can use 20% of total LIHEAP funds payable

• “Funds payable” includes: regular LIHEAP allocation, supplemental or contingency funds, leveraging incentive award funds and reallocation funds. Funds payable does not include carryover funds from the prior year.

• Leveraging funds must not be obligated or expended for administrative costs.

• If planning and administrative costs exceed the allowable amount, non-Federal funds must be used to pay the excess
Calculating the Administrative Costs Cap Maximum

EXAMPLE

Total LIHEAP allotment of $100,000

- First $4,000

- Remaining allotment = $80,000
  
  $100,000 - $20,000

- 10% of remaining allotment $80,000 is:
  
  0.10 * $80,000 = $8,000

Total administrative cost cap = $12,000
Calculating the Percentage of Funds for Administrative Costs

**EXAMPLE**

Ask: What percentage of the total LIHEAP allotment is the administrative cost maximum?

Administrative Cost Max          Total Allotment

\[ \frac{12,000}{100,000} = 0.12 \]

Administrative Cost Percentage = 12%

\[ 0.12 \times 100 = 12\% \]
### Administrative Costs Plan Reporting

2605(c)(1)(C) → Please estimate what amount of available LIHEAP funds will be used for each component that you will operate: **The total of all percentages must add up to 100%**.

<table>
<thead>
<tr>
<th>Component</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating assistance</td>
<td>____%</td>
</tr>
<tr>
<td>Cooling assistance</td>
<td>____%</td>
</tr>
<tr>
<td>Crisis assistance</td>
<td>____%</td>
</tr>
<tr>
<td>Weatherization assistance</td>
<td>____%</td>
</tr>
<tr>
<td>Carryover to the following fiscal year</td>
<td>____%</td>
</tr>
</tbody>
</table>

**12%** % administrative and planning costs

2605(b)(9) % services to reduce home energy needs including needs assessment (assurance 16)

2605(b)(16) % used to develop and implement leveraging activities (limited to the greater of 0.08% or $35,000 for States, the greater of 2% or $100 for territories, tribes and tribal organizations).

______ TOTAL
Administrative Costs Questions

Consult Section I of the LIHEAP Tribal Manual at:

ACF Presenter:
Ms. Lauren Christopher
Lauren.Christopher@acf.hhs.gov
202-401-4870
Carryover and Reallotment Funds

Policy and Reporting
Carryover Policy

- Policy
  - 90% of funds allotted must be obligated within the same federal fiscal year
  - 10% of funds can be carried over into the next federal fiscal year

- Federal Fiscal Year (FFY) means October 1 – September 30

- FFY 2012 is October 1, 2011 through September 30, 2012

- LIHEAP Carryover and Reallotment Report due to ACF by August 1st by email to: LIHEAPsubmissions@acf.hhs.gov
Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) $____________________

2) 10 percent of amount payable $____________________

3) Projected unobligated balance $____________________

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report $0 funds for reallocation.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallocation amount below.

**Carryover amount** $____________________
(Funds to be carried over for obligation in the following fiscal year.)

**Reallocation amount** $____________________
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) **briefly** state reasons that these funds will not be used in the fiscal year for which they were allotted

b) **briefly** describe the types of assistance to be provided with the amount held available for the following fiscal year:

________________________________________
________________________________________
____________________________            ________________
Signature and Title                    Telephone Number
Carryover Policy

EXAMPLE

• XYZ Tribe was allotted $150,000 on Nov. 15, 2011
  – Nov. 15, 2011 is in FFY 2012
  – FFY 2012 ends on September 30, 2012
• XYZ Tribe must obligate 90% of its total allotment by the end of FFY 2012:
  – Multiply 0.90 by $150,000 (total funding) = $135,000
  – This amount ($135,000) must be obligated by September 30, 2012
• XYZ Tribe can carry over up to 10% of its allotment for use in FFY 2013
  – Multiply 0.10 by $150,000 (total funding) = $ 15,000
  – This amount ($15,000) must be obligated by September 30, 2013
Carryover Report

There are four steps to completing the annual LIHEAP Carryover and Reallotment Report. A response on each line of the report is required. The following slides show an example of how to complete the report:

Step 1: Add up all LIHEAP funds received in FFY 2012

EXAMPLE

Regular block grant funds

Leveraging funds

Emergency/contingency funds

Oil overcharge funds

Reallotment funds

$100,000

$7,000

$5,000

$0

$1,200

$113,200
Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) $113,200

2) 10 percent of amount payable $_______________________

3) Projected unobligated balance $_______________________

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report $0 funds for reallocation.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallocation amount below.

**Carryover amount** $_______________________
(Funds to be carried over for obligation in the following fiscal year.)

**Reallocation amount** $_______________________
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) **briefly** state reasons that these funds will not be used in the fiscal year for which they were allotted

b) **briefly** describe the types of assistance to be provided with the amount held available for the following fiscal year:

_________________________________________________________  __________________________
Signature and Title                                      Telephone Number
Carryover Report

Step 2: Multiple 10% by the total LIHEAP funds received in FFY 2012 from step 1

EXAMPLE  $113,200 \times 0.10 = $11,320
Carryover and Reallotment Report for FY 2012  
Due August 1, 2012  

Grantee: XYZ Tribe  
Date: July 15, 2012  

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds)  
   $113,200

2) 10 percent of amount payable  
   $11,320

3) Projected unobligated balance
   

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report $0 funds for reallocation.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallocation amount below.

Carryover amount  
(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount  
(Funds that exceed the 10% carryover amount and are to be returned to the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

____________________________________  __________________________
Signature and Title  Telephone Number
Carryover Report

Step 3: Estimate unobligated balance of FFY 2012 LIHEAP funding that will not be committed for some LIHEAP purpose by September 30, 2012

EXAMPLE Let’s say $12,000

Note:

It is helpful to have a spreadsheet (Microsoft Excel) to track the planned/estimated budget compared to commitments of funds and actual expenditures. It is important to update the budget regularly.
Carryover and Reallotment Report for FY 2012
Due August 1, 2012

Grantee ____________________________ Date ________
XYZ Tribe ___________________________ July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) $113,200

2) 10 percent of amount payable $11,320

3) Projected unobligated balance $12,000

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report $0 funds for reallocation.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallocation amount below.

Carryover amount $__________________
(Funds to be carried over for obligation in the following fiscal year.)

Reallotment amount $__________________
(Funds that exceed the 10% carryover amount and are to be returned to the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

__________________________________________
Signature and Title

__________________________________________
Telephone Number
Carryover Report

Step 4: Ask yourself, “Which amount is less?”, and subtract

A: Projected unobligated funds (step 3)
   OR
B: 10% of total funds received (step 2)

EXAMPLE

$12,000

$11,320

reallotment = $680

If A is less than B, then your Tribe can carryover the amount for A
If B is less than A, then the amount B is what your Tribe must report as available for reallocation by ACF

In this example, the Tribe has $680 reallocation and $0 in carryover (you cannot have both)

Note: Reallocation funds must not be used by grantees after the FFY expires.
Carryover and Reallocation Report for FY 2012
Due August 1, 2012

Grantee  ___ XYZ Tribe ___

Date  _______ July 15, 2012

Section 2607(b)(2)(B) of the LIHEAP statute requires that at least 90% of funds available must be obligated in the year in which they are appropriated. Not more than 10 percent of the amount payable for a fiscal year may be held for obligation in the succeeding fiscal year.

1) Current year amount payable (regular block grant funds, contingency funds, and oil overcharge funds) $______

2) 10 percent of amount payable $______

3) Projected unobligated balance $______

If line 3 is equal to or less than line 2, report the amount on line 3 as your Carryover amount below. Report $0 funds for reallocation.

If line 3 is larger than line 2, then report the amount on line 2 as your Carryover amount below. Report the difference between line 2 and line 3 as the reallocation amount below.

Carryover amount $______ $0
(Funds to be carried over for obligation in the following fiscal year.)

Reallocation amount $______ $680
(Funds that exceed the 10% carryover amount and are to be returned the Federal government.)

If you report a Carryover amount above, please provide the following:

a) briefly state reasons that these funds will not be used in the fiscal year for which they were allotted

b) briefly describe the types of assistance to be provided with the amount held available for the following fiscal year:

Jane Doe, LIHEAP Coordinator (123) 555-1212
Signature and Title Telephone Number

As our example had a reallocation, enter $0 on the carryover line.

List amount from Step 4 calculation on the appropriate line here, in this case the reallocation line.

Lastly, sign the report.
Carryover and Reallotment Questions


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Creating a Payment Matrix to Determine Benefit Levels
Why Distinguish Levels of Benefits?

• Section 2605(b)(5) of the LIHEAP Statute (42 U.S.C. § 8624(b)(5)) requires that the highest level of assistance go to:

  – Households which have the lowest incomes.
  AND
  – Households with the highest energy costs or needs.
Three Required Variables to Determine Benefit Level

1. Household Income
2. Household Size
3. Energy Cost or Need
Determining Lowest Income

• Vary benefit based on percentage of:
  
  – Federal Poverty Guidelines (FPG)
    OR
  – State Median Income (SMI)

Note: HHS publishes the FPG’s each year through an IM on the LIHEAP web site. Grantees must use the most currently available FPG’s at the time of submitting their LIHEAP Plans (45 C.F.R. § 96.85).
## 2012 Federal Poverty Guidelines

<table>
<thead>
<tr>
<th>Household Size</th>
<th>Poverty guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$11,170</td>
</tr>
<tr>
<td>2</td>
<td>15,130</td>
</tr>
<tr>
<td>3</td>
<td>19,090</td>
</tr>
<tr>
<td>4</td>
<td>23,050</td>
</tr>
<tr>
<td>5</td>
<td>27,010</td>
</tr>
<tr>
<td>6</td>
<td>30,970</td>
</tr>
<tr>
<td>7</td>
<td>34,930</td>
</tr>
<tr>
<td>8</td>
<td>38,890</td>
</tr>
</tbody>
</table>
# Sample Calculations

**HH Size = 4**  
**FPG = $23,050**

<table>
<thead>
<tr>
<th>% of FPG</th>
<th>Calculation</th>
<th>Maximum Annual Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 25%</td>
<td>0.25 x $23,050</td>
<td>$5,763</td>
</tr>
<tr>
<td>26% - 50%</td>
<td>0.50 x $23,050</td>
<td>$11,525</td>
</tr>
<tr>
<td>51% - 100%</td>
<td>1.00 x $23,050</td>
<td>$23,050</td>
</tr>
<tr>
<td>101% - 125%</td>
<td>1.25 x $23,050</td>
<td>$28,813</td>
</tr>
<tr>
<td>126% - 150%</td>
<td>1.50 x $23,050</td>
<td>$34,575</td>
</tr>
</tbody>
</table>
Determining Energy Cost or Need

- Fuel Type
- Individual Bill Amount
- Energy Burden
- Climate or Region
- Dwelling Type
- Household Need (specific to situation)
Considerations for Varying Benefits Based on Fuel Type

• Determine cost of fuels and rank fuel types, most to least expensive.
• Highest benefit should go to households using most expensive fuel type as primary source of heating.
• For each fuel type, vary benefit based on level of income.
Sample Benefits Matrix
Based on Fuel Type

<table>
<thead>
<tr>
<th>Household Size:</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>FO, Kero Propane</th>
<th>Electric</th>
<th>Natural Gas</th>
<th>Others</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>$2,707.50</td>
<td>$3,642.50</td>
<td>$4,577.50</td>
<td>$5,512.50</td>
<td>$6,447.50</td>
<td>$7,382.50</td>
<td>$8,317.50</td>
<td>$9,252.50</td>
<td>Up to 25%</td>
<td>$750</td>
<td>$600</td>
<td>$550</td>
<td>$510</td>
</tr>
<tr>
<td>$5,415.00</td>
<td>$7,285.00</td>
<td>$9,155.00</td>
<td>$11,025.00</td>
<td>$12,895.00</td>
<td>$14,765.00</td>
<td>$16,635.00</td>
<td>$18,505.00</td>
<td>Over 25% to 30%</td>
<td>$725</td>
<td>$570</td>
<td>$525</td>
<td>$480</td>
</tr>
<tr>
<td>$8,122.50</td>
<td>$10,927.50</td>
<td>$13,732.50</td>
<td>$16,537.50</td>
<td>$19,342.50</td>
<td>$22,147.50</td>
<td>$24,952.50</td>
<td>$27,757.50</td>
<td>Over 30% to 50%</td>
<td>$700</td>
<td>$550</td>
<td>$500</td>
<td>$450</td>
</tr>
<tr>
<td>$10,830.00</td>
<td>$14,570.00</td>
<td>$18,310.00</td>
<td>$22,050.00</td>
<td>$25,790.00</td>
<td>$29,530.00</td>
<td>$33,270.00</td>
<td>$37,010.00</td>
<td>Over 50% to 75%</td>
<td>$680</td>
<td>$520</td>
<td>$480</td>
<td>$420</td>
</tr>
<tr>
<td>$13,537.50</td>
<td>$18,212.50</td>
<td>$22,887.50</td>
<td>$27,562.50</td>
<td>$32,237.50</td>
<td>$36,912.50</td>
<td>$41,587.50</td>
<td>$46,252.50</td>
<td>Over 75% to 100%</td>
<td>$650</td>
<td>$500</td>
<td>$430</td>
<td>$390</td>
</tr>
<tr>
<td>$16,245.00</td>
<td>$21,855.00</td>
<td>$27,465.00</td>
<td>$33,075.00</td>
<td>$38,685.00</td>
<td>$44,295.00</td>
<td>$49,905.00</td>
<td>$55,515.00</td>
<td>Over 100% to 125%</td>
<td>$630</td>
<td>$480</td>
<td>$400</td>
<td>$360</td>
</tr>
<tr>
<td>$18,952.50</td>
<td>$25,497.50</td>
<td>$32,042.50</td>
<td>$38,587.50</td>
<td>$45,132.50</td>
<td>$51,577.50</td>
<td>$58,222.50</td>
<td>$64,757.50</td>
<td>Over 125% to 150%</td>
<td>$620</td>
<td>$450</td>
<td>$370</td>
<td>$330</td>
</tr>
<tr>
<td>$21,660.00</td>
<td>$29,140.00</td>
<td>$36,620.00</td>
<td>$44,100.00</td>
<td>$51,580.00</td>
<td>$59,060.00</td>
<td>$66,540.00</td>
<td>$74,020.00</td>
<td>Over 150% to 175%</td>
<td>$610</td>
<td>$425</td>
<td>$330</td>
<td>$300</td>
</tr>
</tbody>
</table>
Considerations for Varying Benefits Based on Energy Burden

• Energy Burden =
  current energy cost / total monthly income

• Decision Point:
  include or exclude any low-income rate discounts in total cost of energy bill?
Sample Benefits Matrix Based on Energy Burden

<table>
<thead>
<tr>
<th>Energy Burden</th>
<th>HH Size (1-3)</th>
<th>HH Size (4 or more)</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.5% &amp; higher</td>
<td>$450</td>
<td>$500</td>
</tr>
<tr>
<td>18% - 24.4%</td>
<td>$350</td>
<td>$400</td>
</tr>
<tr>
<td>10% - 17.9%</td>
<td>$250</td>
<td>$300</td>
</tr>
<tr>
<td>9.9% or less</td>
<td>$150</td>
<td>$200</td>
</tr>
<tr>
<td>24.5% &amp; higher</td>
<td>$450</td>
<td>$500</td>
</tr>
</tbody>
</table>
Payment Matrix Questions

Consult Section D of the LIHEAP Tribal Manual:

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Ms. Yuliya Rzad
Yuliya.Rzad@acf.hhs.gov
202-401-9228
Program Integrity
Program Integrity Activities

• Preventing Waste, Fraud, and Abuse
  – Preventing improper benefits through:
    • Verification of Identity
      – Collecting and verifying Social Security Numbers (SSNs)
      – Requiring proof of identity from all household members
    • Verification of Income
      – Documentation requirements
      – Verification through existing databases
Program Integrity Activities

• Preventing Waste, Fraud, and Abuse
  – Preventing improper payments to vendors through:
    • Verifying the authenticity of vendors
      – Taxpayer Identification Number (TIN)/Employer Identification Number (EIN)
      – State registration/business licensing
    • Systems and accounting practices to prevent duplicate or incorrect payments
  – Preventing fraud by LIHEAP staff through:
    • Training
    • Review of files and payments
    • Separation of duties
Program Integrity Assessment

• Electronic submission due: September 1 (required for funding)
• Make PIA available for public comment in the same manner as the plan
• Resources:
  – [LIHEAP-IM-2012-05](#) – Updated form and clarifying instructions for FY 2013
  – [LIHEAP-AT-2010-06](#) – Introducing new PIA requirement
Program Integrity Assessment

• For overlapping questions, referring to a previous answer within the PIA is permissible (but do not refer to pages in your plan)
• Be specific and as detailed as possible
• Complete all boxes/areas and address activities done in FY 2012 and planned changes for FY 2013
• Distinguish:
  – documentation versus verification procedures
  – required versus requested information
  – applicant versus all household members requirements
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT: HHS is requiring further detail from Grantees on their FY2013 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2013 plan which represent improvements or changes to the Grantees’ FY2013 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.

<table>
<thead>
<tr>
<th>State, Tribe or Territory (and grant official):</th>
<th>Date/Fiscal Year:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**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 FY2013.

If there is no plan in place, please explain why not.

Necessary outcomes from these systems and strategies

The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.

Answer or say “None” or “N/A”

Answer or say “None” or “N/A”

Answer or say “None” or “N/A”
Required Program Integrity Responses

- 13 areas including:
  - Audit findings
  - Compliance monitoring
  - Fraud reporting
  - Verifying applicant identities
  - Social security number requests
  - Cross-checking social security numbers against government systems
  - Verifying applicant income
  - Privacy protection and confidentiality
  - Benefits policy
  - Procedures for unregulated energy vendors
  - Verifying authenticity of energy vendors
  - Training and technical assistance
Program Integrity Questions


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Questions and Comments