

Delaware	LIHEAP Program Integrity Assessment Plan		FFY 2012
RECENT AUDIT FINDINGS			
<p>LIHEAP received two findings (1) that cited LIHEAP for insufficient contractor agency monitoring and (2) insufficient documentation of expenditures which could lead to disallowed costs.</p>	<p>Delaware has revised its policies and procedures on monitoring to include a more comprehensive list of activities which will lead to better documented tracking of client eligibility and benefits.</p>	N/A	<p>Strengthened program and fiscal monitoring and increased documentation of payments</p>
COMPLIANCE MONITORING			
<p>Delaware has revised its 2011 Monitoring form used for programmatic monitoring of both the regular heating program and the Summer Cooling Assistance Program (SCAP) which has resulted in a more comprehensive monitoring than had occurred in the past. Temporary staff was also brought on to increase the number of client files</p>	<p>Delaware plans to combine some of its programmatic monitoring with fiscal monitoring and providing a comprehensive monitoring report for contractor agencies to better assess the effectiveness of their programs. The first comprehensive report is scheduled for the Spring of 2012.</p>	N/A	<p>A comprehensive schedule will be used to track monitoring reports, corrective action plans and follow-up for Delaware's contractor agencies on or before June 30, 2012.</p>
FRAUD REPORTING MECHANISMS			
<p>The State of Delaware's Auditor's Office maintains an anonymous Delaware referral site to facilitate the reporting of allegations of Fraud, Waste and Abuse of State government resource. Delaware also have hotline - 1-800-55-FRAUD (1-800-553-7283)</p>	<p>No additional plans at this time to enhance fraud reporting mechanisms.</p>	N/A	<p>ALL reported cases of fraud, waste, and or abuse, will be addressed by the LIHEAP Program Administrator as outlined in the Policies and Procedures Manual.</p>

VERIFYING APPLICANT IDENTITIES		
<p>Delaware has consistently required that a social security card or birth certificate be made available for every applicant. Copies of these are kept on file. All new applicants must call for an appointment at which time they are told what documents are essential to insure the validity of an application.</p>	<p>While we require all applicants and household members aged 6 months or older to produce a social security card, Delaware will research the feasibility of linking to the Social Security Administration to verify these social security numbers. Our current policy requires submitting a document with an SSN, though not necessarily an actual SS card.</p>	<p>Enhanced documentation that LIHEAP eligible households are receiving benefits.</p>
SOCIAL SECURITY NUMBER REQUESTS		
<p>Delaware has consistently required that a social security card or birth certificate be made available for every applicant. Copies of these are kept on file. All new applicants must call for an appointment at which time they are told what documents are essential to insure the validity of an application.</p>	<p>Policy remains the same. It will be fully articulated in the new policies and Procedures manual.</p>	<p>Enhanced documentation that LIHEAP eligible households are receiving benefits.</p>
CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES		
<p>Delaware does not employ any existing government systems and databases to verify applicant or household member identities.</p>	<p>Delaware is researching the cost benefit of such services. In the ongoing development of our policies and procedures, as described above, Delaware will be making a determination whether to check 100% of ID's or a sampling. Delaware would employ an existing government system and/or our own in-state CAPS system.</p>	<p>Delaware is working with other agencies within the state to cross reference SSN's with state identifiers known as Master Client Identifier or (MCI) numbers for all LIHEAP applicants as part of the state's own CAP system database.</p>
		<p>Cross referencing SSN's with LIHEAP clients and state MCI numbers will enhance the validity of clients submitting SSN's when applying for LIHEAP.</p>

VERIFYING APPLICANT INCOME

<p>While Delaware requires that applicants provide proof of income in order to determine their eligibility for LIHEAP, the state does not verify income with other state directories.</p>	<p>For FY11, Delaware is researching developing a cooperative relationship with the Delaware Department of Labor Unemployment Insurance Agency to match recipient employment data, seeking to verify potential current employment history and unemployment benefits. Delaware would inform clients that this would occur with cross checking such services. Delaware have begun to revise policies and plan to institute training on earnings computation procedures. Under consideration is instituting second party review and state monitoring of re-figure within in the case file</p>	<p>Delaware has no additional plans to verify income at this time. We will rely on the work of the Program Integrity Workgroup to guide us in this process.</p>	<p>Effective income determination achieved through coordination across program lines.</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------

PRIVACY-PROTECTION AND CONFIDENTIALITY

<p>LIHEAP Contractor agency staff must sign a confidentiality agreement, including temporary employees that states they will not share privileged and client information with any unauthorized person or agency. Client files are kept in locked file cabinets and access to client databases are password protected.</p>	<p>No new policies or procedures being implemented for 2012. However, Delaware is continually looking at best practices for consideration in modifying its own policies and procedures to enhance privacy and confidentiality of its LIHEAP clients.</p>	<p>N/A</p>	<p>Any enhancements to protect clients confidentiality is encouraged and will be reviewed, especially recommendations by the Program Integrity Workgroup.</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------

LIHEAP BENEFITS POLICY

<p>LIHEAP databases track all clients and household members by SSN to minimize the potential for receiving fraudulent benefits.</p>	<p>No initiatives at this time.</p>	<p>N/A</p>	<p>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</p>
-------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------	------------	-----------------------------------------------------------------------------------------------

PROCEDURES FOR UNREGULATED ENERGY VENDORS

<p>Contractor agency staff spot check vendor prices from time to time to ensure that LIHEAP clients are not being charged any differently than non LIHEAP clients. Staff make blind calls to agencies to track prices. Clients may report potential fraud to LIHEAP agencies. LIHEAP agencies inform LIHEAP Administrator who will turn over this information to the Division of Weights and Measures which has the responsibility of monitoring fuel trucks and deliveries.</p>	<p>Contractor agencies will do sight visits on select unregulated fuel vendors to monitor activities and services to LIHEAP households.</p>	<p>Delaware has methods in place for addressing fraud in its Policies and Procedures Manual which is available upon request.</p>	<p>Participating vendors are thoroughly researched and inspected before benefits are issued.</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

<p>The State of Delaware checks the list of non-regulated utility vendors that Catholic Charities contracts with on an annual basis to provide fuel to Low-Income Home Energy Assistance Program (LIHEAP) eligible households. The LIHEAP Administrator goes to the Excluded Parties List System (EPLS) types in the vendor name, and clicks to see if the vendor name comes up. If the name does not come up, the indication is that the vendor has not been barred or suspended from doing business under the name the State and sub grantee has for the unregulated utility vendor.</p>	<p>For FY11, Delaware will review and strengthen sub grantee vendor agreements. Per above, Delaware will be recommending sub grantees guarantee second party review of selected cases. Delaware will institute a random review of files to verify addresses with utility company.</p>	<p>We have a plan in place that is described in the first section of this area. In addition, Delaware vendors must have a valid and current State of Delaware Business License, where applicable.</p>	<p>These strategies enable Delaware to be confident that the vendors they are using to provide energy assistance to LIHEAP households are viable business entities and are not barred from providing services in the State of Delaware.</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

TRAINING AND TECHNICAL ASSISTANCE			
<p>LIHEAP staff attend conference and workshops sponsored by such agencies as the National Energy Assistance Directors' Association (NEADA) and the National Low-Income Energy Consortium (NUEC), which both provide training and technical assistance on LIHEAP fraud prevention, as well as an opportunity to network with other state LIHEAP Administrators. HHS provides Information Memorandums that are invaluable in helping to prevent fraud and providing TSTA. LIHEAP Administrator passes this knowledge on to contractor agencies and vendors in meetings.</p>	<p>No new TB TA activities planned for 2012 except on-going meetings with contractor agencies. If an IM for HHS requires additional training, the LIHEAP Administrator will arrange for any necessary TSTA to contractor agencies, vendors, staff, etc.</p>		<p>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</p>
AUDITS OF LOCAL ADMINISTERING AGENCIES			
<p>all agencies are required to have an A-133 audit annually and present same to Delaware LIHEAP office annually.</p>	<p>No new policies and procedures in place for 2012.</p>	<p>N/A</p>	<p>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible</p>
<p>Additional Information</p> <p>Any additional information to document statements made in this Program Integrity Assessment Plan are available upon request by HHS.</p>			