

Agency's Program Integrity Assessment

Low Income Energy Assistance Program (LIHEAP)

MDHS/DCS is requiring further detail from Subgrantee Agencies on their FY2011 plans for preventing and detecting fraud, waste and improper payments. MDHS/DCS is also requiring that agencies highlight and describe all elements of the FY2011 plan which represent improvements or changes to the agency's FY2010 plan for preventing and detecting fraud, abuse and improper payment prevention.

Subgrantee/Agency:		Date/Fiscal Year:	
Recent Audit Findings			
<p>Describe any audit findings of material weakness and reportable conditions, questioned costs and other findings cited in FY2010 or the prior three years in annual audits, State monitoring assessments, Inspector General reviews, or other Government Agency reviews of LIHEAP agency finances.</p>	<p>Please submit whether the cited audit findings or relevant operations have been corrected. If not, please describe the plan and timeline for doing so in FY 2011.</p>	<p>If there is no plan in place, please explain why not.</p>	<p>Necessary outcomes from these systems and strategies</p>
N/A	N/A	N/A	N/A
Compliance Monitoring			
<p>Describe your agency's FY 2010 strategies that will continue in FY2011 for internal monitoring compliance with State and Federal LIHEAP policies and procedures by your agency.</p>	<p>Please highlight and strategies for compliance monitoring from your plan which will be newly implemented as of FY 2011</p>	<p>If you don't have a firm compliance monitoring system in place for FY11 please describe how your agency will verify that LIHEAP policy and procedures are being followed</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>The State of IMS utilizes an established monitoring system which is conducted in accordance to the Single Audit Act and OMB Circulars to ensure all subgrants are administered in compliance with the federal requirements and with the terms of the subgrant agreement. This system include annual onsite review of fiscal and using the Virtual ROMA system. The State will conduct quality control reviews as a check and balance system to ensure compliance.</p>	<p>The MDHS/DCS utilizes Virtual ROMA to allow desk audits to be performed on a quarterly basis and conducts annual site visits.</p>	N/A	N/A
Fraud Reporting Mechanisms			

<p>For FY2010 activities continuing in FY2011, please submit 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 and tools or mechanisms from your plan which will be newly implemented in FY2011, 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 submit 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>
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<p>The Department has a fraud hotline and all divisions have 1-800 numbers which are made available to the public, brochures, county offices and the DHS website. Matters brought to the attention of the department may be referred to the Division of Program Integrity for review and investigations.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
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Verifying Applicant Identities

<p>Describe all FY2010 agency policies continuing in FY2011 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 FY2011</p>	<p>If you don't have a system in place for verifying applicant's identities please explain why and how your agency is ensuring that only authentic and eligible applicants are receiving benefits.</p>	<p>Necessary outcomes from these systems and strategies</p>
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<p>Applicants must submit a Social Security card and birth certificate of all household members and a photo I.D. of the applicant.</p>	<p>MDHS is currently working on agreement with the State Department of Health, the Social Security Administration and the State Department of Corrections to further verify information. The department will establish a workgroup of other state agencies to help access information relative to client identities.</p>	<p>N/A</p>	<p>N/A</p>
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Social Security Number Requests

<p>Describe your agency's FY2011 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.</p>	<p>Please submit whether your agency's policy for requiring Social Security numbers is new as of FY2011, or remaining the same.</p>	<p>If your agency 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>
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<p>The Department currently requires Social Security numbers to verify eligibility of applicants and household members applying for LIHEAP benefits.</p>	<p>The Department's policy for requiring social security numbers will remain in effect for FY 2012. The department is working on an agreement with the Social Security Administration to verify information.</p>	<p>N/A</p>	<p>N/A</p>
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Cross-Checking Social Security Numbers Against Government Systems/Databases

<p>Describe if and how your agency used existing government systems and databases to verify applicant or household member identifies in FY2010 and continuing in FY2011. (Social Security Administration Enumeration Verification Systems, 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 FY2011.</p>	<p>If your agency won't be cross checking Social Security Numbers and ID information with existing government databases, please submit how the State will supplement this fraud prevention strategy.</p>	<p>Necessary outcomes from these systems and strategies</p>
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<p>The department does not currently use existing government systems and data bases to verify applicant and household members identity. However, we require applicants to submit social security cards and birth certificates of all household members .</p>	<p>The department is working on an agreement with the Social Security Administration to cross check numbers against its database.</p>	<p>N/A</p>	<p>N/A</p>
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Verifying Applicant Income

<p>Describe how your agency used State Directories of new hires or similar systems to confirm income eligibility in FY2010 and continuing in FY2011.</p>	<p>Please highlight which, if any, policies or strategies for using new hire directories will be newly implemented in FY2011.</p>	<p>If your agency won't be using new hire directories to verify applicant and household member incomes how will the state be verifying that information?</p>	<p>Necessary outcomes from these systems and strategies</p>
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<p>The department does not currently use state directories of new hires or similar systems to confirm income eligibility.</p>	<p>The department is currently working on an agreement with MS Employment Security Commission to verify new hires and the IRS to verify income.</p>	<p>N/A</p>	<p>N/A</p>
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Privacy-Protection and Confidentiality

<p>Submit the financial and operating controls in place in FY2010 that will continue in FY2011 to protect client information against improper use or disclosure.</p>	<p>Please highlight which, if any, controls or strategies from your plan which will be newly implemented as of FY2011.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
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<p>The department requires that subgrantees have in place a financial management system and a policies and procedures manual which contains adequate internal controls for the administration of the program. Each system has designated users who are given access to software. All documentation is kept under lock and key with designated personnel having access. Each subgrantee is required to carry liability insurance to cover staff and adhere to HIPPA.</p>	<p>Virtual ROMA has confidentiality statements signed by all users.</p>	<p>N/A</p>	<p>N/A</p>
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LIHEAP Benefits Policy

<p>Describe FY2010 agency policies continuing in FY2011 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.</p>	<p>Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY2011</p>	<p>If the State doesn't have policy in place to protect against improper payments when making payments or providing benefits on behalf of clients, what steps is the State taking to ensure program integrity</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>LIHEAP payments are made to energy vendors not clients. Clients must submit a valid energy bill when applying for assistance. Federal laws requires LIHEAP subgrantees to have vendor agreements in place.</p>	<p>All payments are made through Virtual ROMA. Agencies use vendor portals to ensure accounts are valid and that payments are not being duplicated.</p>	<p>N/A</p>	<p>N/A</p>

Procedures for Unregulated Energy Vendors

<p>Describe your agency's FY2010 procedures continuing in FY2011 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other unregulated energy utilities.</p>	<p>Please highlight any strategies policy in this area which will be newly implemented in FY2011</p>	<p>If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please submit how the State is ensuring program integrity.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All LIHEAP subgrantees have vendor agreements in place with energy vendors. All vendors are currently in Virtual ROMA.</p>	<p>The department requires subgrants to reverify the eligibility of energy vendors. All new vendors must have documentation and be approved by the local and state agency before their input into Virtual ROMA and be able to conduct business.</p>	<p>N/A</p>	<p>N/A</p>

Verifying the Authenticity of Energy Vendors

<p>Describe agency's FY2010 policies</p>		<p>If you don't have a system in</p>	
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<p>Describe agency's FY2010 policies continuing in FY2011 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of your agency's procedure for averting fraud.</p>	<p>Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY2011.</p>	<p>If you don't have a system in place for verifying vendor authenticity, please submit how your agency can ensure that funds are being distributed through valid intermediaries?</p>	<p>Necessary outcomes from these systems and strategies</p>
<p>All LIHEAP subgrantees have vendor agreements in place with energy vendors. All vendors are currently in Virtual ROMA.</p>	<p>The department requires subgrants to reverify the eligibility of energy vendors. All new vendors must have documentation and be approved by the local and state agency before their input into Virtual ROMA and be able to conduct business.</p>	<p>N/A</p>	<p>N/A</p>

Training and Technical Assistance

<p>In regards to fraud prevention, please submit elements of your FY2010 plan continuing in FY2011 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 FY2011</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>The department provides training and technical assistance to employees, subgrantee staff, clients and energy vendor annually. Further the department provide training and technical assistance at the DCS Implementation Workshop.</p>	<p>The training and technical assistance plan will be adjusted to meet specific needs and provide hands on training to subgrantee staff on Virtual ROMA.</p>	<p>N/A</p>	<p>N/A</p>

Audits of Local Administering Agencies

<p>Please submit the annual audit requirements in place for your agency in FY2010 that will continue into FY2011.</p>	<p>Please describe new policies or strategies to be implemented in FY2011.</p>	<p>If you don't have specific audit requirements for your local agency, 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>
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<p>Subgrantees are required to follow a procurement process for soliciting an independent auditor. A notice of selection is sent to the department. The department requires subgrantees that exceed \$500,000 in expenditures to follow the Single Audit Act and submit the audit report within 6 months of the fiscal year end date. Audit reports are reviewed by the Division of Program Integrity and Community Services (funding division).</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
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Additional Information

Please attach further information that describes the agency's Program Integrity Policies, including supporting documentation from program manuals, including pages/sections from established LIHEAP policies and procedures.