

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

ATTACHMENT 1
PROGRAM INTEGRITY ASSESSMENT
Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT: HHS is requiring further detail from Grantees on their FY2012 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2012 plan which represent improvements or changes to the State's FY2011 plan for preventing and detecting fraud, abuse and improper payment prevention.

State, Tribe or Territory (and grant official): Vermont
Richard Moffi, Fuel Assistance Program Chief

Date/Fiscal Year: July 15, 2011 FFY2012

VERMONT Program Notes:

Seasonal Fuel Assistance (SFA) – Vermont's Seasonal Fuel Assistance Program is administered state-wide by Department for Children and Families' Economic Services Division (ESD) which includes the Office of Home Heating Fuel Assistance.

Crisis Fuel Assistance (CFA) – Vermont's Crisis Fuel Assistance Program is operated by the state's five community action agencies under grant agreements with the Office of Home Heating Fuel Assistance.

ACCESS Database – The Economic Services Division maintains a state-wide benefits database called ACCESS (not Microsoft Access). This database includes applicants and recipients for TANF, SNAP, LIHEAP, Medicare, Medicaid, all Vermont health benefit programs, and Child Support.

RECENT AUDIT FINDINGS

Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2011 or the prior three years, in annual audits, State monitoring assessments, Inspector General reviews, or other Government Agency reviews of LIHEAP agency finances.

Seasonal Fuel Assistance

For year ending June 30, 2009 KPMG auditors' report as required by OMB Circular A-133 found the following condition: "During our testwork over eligibility, we noted that 1 of the 40 applicants selected for testwork was not eligible to receive benefits as the participant's income exceeded the eligibility thresholds."

Crisis Fuel Assistance

CFA was audited as part of the audit noted above and there were no findings. The Crisis Fuel Assistance grant agreements with the community action agencies have single audit requirements and record maintenance requirements to support audits after a season and grant closes.

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 FY2012.

Seasonal Fuel Assistance

KPMG concluded that “Corrective action is not considered necessary as we believe further procedures are not warranted and would not be cost effective.”

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

No plan required based on the conclusions of the auditors.

Necessary outcomes from these systems and strategies.

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

COMPLIANCE MONITORING

Describe the State's FY2011 strategies that will continue in FY2012 for monitoring compliance with State and Federal LIHEAP policies and procedures by the State and local administering agencies.

Seasonal Fuel Assistance

The Office of Home Heating Fuel Assistance (the Fuel Office) functions in the Economic Services Division as a part of eligibility operations. In that capacity the three members of the Fuel Office provide staff training, monitor processing of applications and reviews, and undertake eligibility quality assurance. Compliance monitoring includes regular frequent (at least monthly, and often weekly) statistical reviews of applications, eligibility, denials, and benefits levels to observe any significant variations that may be the result of errors or misunderstanding of state or federal regulations.

Crisis Fuel Assistance

Vermont's Crisis Fuel Assistance Program is operated by the state's five community action agencies under grant agreements with the Office of Home Heating Fuel Assistance. The Fuel Assistance Program Chief conducts program reviews mid-season with two or three of the five agencies annually. Each agency is reviewed no less frequently than once every two years. Sample cases are selected for a detailed review of eligibility determination. Crisis Fuel Coordinators and the agency Executive Director are informed of the findings and any corrective action needed. Depending on the finding the Fuel Chief will issue a clarifying memo that can be circulated to all staff with the particular agency and to the Crisis Fuel Coordinators at the other agencies.

Crisis Fuel training is provided to all agencies prior to the start of the Crisis Fuel season (last Monday in November). Throughout the season monthly conference calls are conducted between the Fuel Office and Crisis Fuel Coordinators from each agency to identify, discuss and clarify any problems or issues that are being experienced.

Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of FY2012.

None to be newly implemented for FFY2012. Internal discussions anticipate that the ESD Fraud and Quality Control Unit may assume some aspects of compliance monitoring in the future but not during FFY2012.

If you don't have a firm compliance monitoring system in place for FY2012, please describe how the State is verifying that LIHEAP policy and procedures are being followed.

N/A

Necessary outcomes from these systems and strategies.

A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.

Vermont Outcome: A regular and predictable methodology utilizing program-knowledgeable staff to provide effective monitoring, information gathering, analysis and remediation

FRAUD REPORTING MECHANISMS

For FY2011 activities continuing in FY2012, 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.

Seasonal Fuel Assistance

Crisis Fuel Assistance

The Economic Services Division in the Department for Children and Families has a Fraud and Quality Control Unit. SFA senior management accepts fraud concerns, complaints and referrals from clients, ESD/DCF staff, fuel suppliers and the general public. SFA documents and refers credible cases to the Fraud / QC Unit for investigation. CFA workers refer fraud concerns, complaints and referrals that they receive or observe to SFA for the same referral to the Fraud / QC Unit.

Fraud is defined by statute (33 VSA § 141) as:

- A. Use of a willfully false statement, representation, impersonation, or other fraudulent device to obtain, attempt to obtain or aid and abet any person to obtain assistance or benefits to which he is not lawfully entitled or a larger amount than that to which he is lawfully entitled; or
- B. Disposition of or knowingly aiding or abetting in disposition of property to obtain assistance to which a person is not entitled or a larger amount than that to which he is entitled.

Suspected Fraud is defined in policy 2015.1 at:

<http://humanservices.vermont.gov/on-linerules/esd/Group%202000%20Rules.pdf/view>

The Department for Children and Families website contains a "Complaints and Concerns" section where the public in general or clients in particular can go to find out how to register a complaint or express their concern, include issues related to fraud or abuse.

Please highlight any tools or mechanisms from your plan which will be newly implemented in FY2012, and the timeline for that implementation.

None to be newly implemented.

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.

The Fraud and QC unit is available to the public through department representatives.

Necessary outcomes of these strategies and systems

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.

Vermont Outcome: Open and direct communication between the public (including clients) and the Department is critical. As stated on the DCF website: "The work we do requires us to make difficult decisions on a daily basis—ones that affect people's lives and that not everyone will agree with. To make sure the decisions we make are in the best interest of the individuals, families, and children involved, we need to:

- Hear from you if you have concerns;
- Listen with an open mind; and
- Learn from what you have to say.

If you have a concern/complaint about a decision we've taken, the lack of action on our part, or the way you've been treated, we want to hear about it."

VERIFYING APPLICANT IDENTITIES

Describe all FY2011 State policies continuing in FY2012 for how identities of applicants and household members are verified.

Seasonal Fuel Assistance

Social security numbers for all members of a household are required on Seasonal Fuel Assistance applications. A sample application is available as a pdf document.

SFA Benefit Program Specialists (BPS) employed by ESD use the ESD ACCESS in enter client application data and determine eligibility and program benefits. The ACCESS database match the head-of-household's social security number to active and inactive benefit records and confirms identity of other members of the households listed or not listed on the Seasonal Fuel Application using their social security numbers.

Crisis Fuel Assistance

Social security numbers for all members of a household are required on Crisis Fuel Assistance applications. Sample applications are available as pdf documents.

CFA workers use the ESD ACCESS database system to match the head-of-household's social security number to active and inactive benefit records for the confirmation of income, benefit program eligibility and household composition. ACCESS is also used to confirm identity and other members of the households listed or not listed on the Crisis Fuel Application using their social security numbers.

Please highlight any policy or strategy from your plan which will be newly implemented in FY2012.

None to be newly implemented.

If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.

N/A. A system is in place using social security numbers.

Necessary outcomes from these systems and strategies

Income and energy supplier data that allow program benefits to be provided to eligible individuals.

Vermont Outcome: Access to consistent, accurate and up-to-date client information including but not limited to identity, income, and household composition.

SOCIAL SECURITY NUMBER REQUESTS

Describe the State's FY2012 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.

Seasonal Fuel Assistance

Crisis Fuel Assistance

Social security numbers for all members of fuel assistance households are required on Seasonal Fuel Assistance and Crisis Fuel Assistance applications.

Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2012, or remaining the same.

Seasonal Fuel Assistance

Crisis Fuel Assistance

Social security numbers for all members of fuel assistance households has been an ongoing requirement for both SFA and CFA for at least the last 15 years.

If the State is not requiring Social Security Numbers of LIHEAP applicants and/or household members, please explain what supplementary measures are being employed to prevent fraud.

Not applicable.

Necessary outcomes from these systems and strategies

All valid household members are reported for correct benefit determination.

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

Describe if and how the State used existing government systems and databases to verify applicant or household member identities in FY2011 and continuing in FY2012. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)

Seasonal Fuel Assistance
Crisis Fuel Assistance

ESD uses "Numident" on a nightly basis to confirm that social security numbers for clients in ACCESS are attributed to the correct individuals by name and date of birth. ESD Benefit Program Specialists (BPSs) or Supervisors enter a function in ACCESS to request the match for someone who has an unverified social security number. Once a month, regardless of individual requests by ESD workers ACCESS runs a tape match with Numident for all cases in our system.

The ACCESS database runs monthly tape matches with Vermont Unemployment Compensation. The Vermont Office of Child Support (OCS) automatically crosses-over child support, alimony and tax intercept payments received by clients. OCS provides limited/restricted information for incarcerated individuals linked to client households. OCS uses the federal parent locator service (FPLS) nationwide for physical addresses and matches are updated in the OCS and ESD sides of ACCESS. (OCS occupies a separate section of the ACCESS database.)

Medicare and Medicaid benefits and Vermont's healthcare and pharmacy programs reside in ACCESS. Client deaths are entered into ACCESS and are readily accessible.

Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY2012.

None to be newly implemented.

If the State won't be cross checking Social Security Numbers and ID information with existing government databases, please describe how the State will supplement this fraud prevention strategy.

Not applicable.

Necessary outcomes from these systems and strategies

Use of all available database systems to make sound eligibility determination.

VERIFYING APPLICANT INCOME

Describe how the State or designee used State Directories of new hires or similar systems to confirm income eligibility in FY2011 and continuing in FY2012.

Seasonal Fuel Assistance
Crisis Fuel Assistance

ACCESS contains verified income from all sources (earned and unearned) for benefit programs including SNAP, TANF, Medicare, Medicaid, Vermont healthcare and pharmacy programs, State General and Emergency Assistance.

Monthly tape matches run by ACCESS with Vermont Unemployment Compensation and employment earnings reported through Reach Up (Vermont's TANF program) provide the bulk of income information related to new hires.

Both Seasonal and Crisis Fuel Assistance policies allow workers to require documentation of income or any other factor related to eligibility that may be questionable, incomplete or not available through ACCESS.

Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY2012.

None to be newly implemented.

If the State won't be using new hire directories to verify applicant and household member incomes how will the State be verifying that information?

N/A. Information available in ACCESS from Reach Up (TANF) and State Unemployment Compensation provide the necessary information.

Necessary outcomes from these systems and strategies
Effective income determination achieved through coordination across program lines.

PRIVACY-PROTECTION AND CONFIDENTIALITY

Describe the financial and operating controls in place in FY2011 that will continue in FY2012 to protect client information against improper use or disclosure.

Seasonal Fuel Assistance

All employees of the Economic Services Division sign a confidentiality agreement at the start of employment. The ACCESS database requires a user to be authorized by the IT division and entry is protected by two separate passwords that are required to be changed at monthly and quarterly intervals.

All applicants of benefits from the Economic Services Division, including Seasonal Fuel Assistance, are advised of the "Rights and Responsibilities," including confidentiality on the application and benefit notices.

All fuel suppliers certified by the Office of Home Heating Fuel Assistance agree to a "Confidentiality" clause as part of the certification agreement.

The operation of the Department for Children and Families operate under formal business practices that are subject to general financial audits and program specific audits on an annual basis.

Crisis Fuel Assistance

The Crisis Fuel Assistance grant agreements with the community action agencies contain specific requirements for: privacy and security standards, security and data transfers, computing and communication, safeguarding and reporting responsibilities for personal identifiable information, and security guidance for contractors and grantees of the Agency of Human Services.

To access the ACCESS database crisis fuel workers must have systems approval for a "Citrix" account to connect to the database and be issued a "key fob" assigned for their use that provides a constantly changing entry authorization number. The ACCESS database requires a user to be authorized by the IT division and entry is protected by two separate passwords that are required to be changed at monthly and quarterly intervals.

Please highlight any controls or strategies from your plan which will be newly implemented as of FY2012.

None to be newly implemented.

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.

Not applicable.

Necessary outcomes from these systems and strategies
Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.

LIHEAP BENEFITS POLICY

Describe FY2011 State policies continuing in FY2012 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.

Seasonal Fuel Assistance

Fuel suppliers certified by the Fuel Office agree to the terms and conditions of certification found at: http://dcf.vermont.gov/sites/dcf/files/pdf/esd/fuel/Cert_Agr_Terms_Cond.pdf
Clause #7, 8, 9 and 10: Direct Bank Deposit, Benefit Data, Line of Credit and Use of Line of Credit (respectively) all ensure that proper individual benefit payments for individual eligible clients are being made to fuel suppliers.

Benefit Payments are issued only by the Office of Home Heating Fuel Assistance through the Department and State business offices directly into verified bank accounts of certified fuel suppliers. At least annually the Fuel Office runs a “pre-note” test to confirm supplier bank accounts. Pre-notes are also run when a supplier changes a bank account or becomes newly certified.

Crisis Fuel Assistance

Each community action agency has a separate purchase order, invoice tracking and payment monitoring system for the issuance of crisis fuel benefit to fuel and energy suppliers. Although the system details are different the basics are the same: authorization to fuel suppliers is made by the community action representative, invoices are received after fuel is delivered or after client accounts for regulated utilities are credited, and those invoices are matched against a crisis fuel grant made by an authorized agency representative.

Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY2012.

None to be newly implemented in FFY2012

Seasonal Fuel Assistance

The Fuel Program Statute (Title 33 Chapter 26) was amended by Act 88 on 4/29/10 to require: “No later than September 1, 2011, the secretary of human services or designee shall implement a payment system to pay fuel benefits to certified fuel suppliers after the fuel is delivered or, for metered fuel and regulated utilities, after the beneficiary’s account has been billed.” The “fuel dealer secure web portal” being developed will roll-out in two phases: Phase 1 in FFY2012 will provide for the transfer of client benefit documentation only; Phase 2 in FFY2013 will include the “payment-after-delivery” function.

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 supplementary steps is the State taking to ensure program integrity.

Not applicable.

Necessary outcomes from these systems and strategies

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

Vermont Outcome: Fuel suppliers receive only benefits approved either by the Fuel Assistance Office for Seasonal Fuel Assistance or by the community action agency for Crisis Fuel Assistance.

PROCEDURES FOR UNREGULATED ENERGY VENDORS

Describe the State's FY2011 procedures continuing in FY2012 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.

Seasonal Fuel Assistance

Fuel suppliers certified by the Fuel Office agree to the terms and conditions of certification found at: http://dcf.vermont.gov/sites/dcf/files/pdf/esd/fuel/Cert_Agr_Terms_Cond.pdf

Applicants for Seasonal Fuel Assistance identify their fuel supplier on their application for assistance. Suppliers, including regulated utilities, are certified by the Office of Home Heating Fuel Assistance after original, signed and dated acceptable documentation is submitted to the Office. A bank account "pre-note" test is run to verify the supplier's bank account. When the existence or authenticity of a dealer is questioned additional information is sought either from the dealer or the Secretary of State's Office and public records.

Clause #15 "Outstanding Credit Balances" requires certified suppliers to submit a "Refund Report" to the Fuel Office a full accounting of the use of benefits in the prior heating season. For the past thirteen heating seasons the Fuel Office provides the base data forms (client name, ID#, address, fuel type, total benefits issued) to the suppliers to ensure consistency of data submission. Refund reports are reviewed by Fuel Office staff and discrepancies or questionable patterns are reported to the Fuel Chief for further investigation and referral to the Fraud Unit if necessary. In addition, benefit recipients provide a self-interest level of monitoring of the use of their benefit by fuel supplies thus ensuring they receive the full benefit of their fuel assistance.

Crisis Fuel Assistance

Each community action agency has a separate purchase order, invoice tracking and payment monitoring system for the issuance of crisis fuel benefit to fuel and energy suppliers. Although the system details are different the basics are the same: authorization to fuel suppliers is made by the community action representative, invoices are received after fuel is delivered or after client accounts for regulated utilities are credited, and those invoices are matched against a crisis fuel grant made by an authorized agency representative.

Please highlight any strategies policy in this area which will be newly implemented in FY2012.

Seasonal Fuel Assistance

The Fuel Assistance Office as of FFY2011 no longer certifies suppliers of firewood or wood pellets. Benefits payments in FFY2012 will be made directly to the eligible head of household who can negotiate the purchase of firewood or pellets with any supplier they choose. Issues related to fraud, high prices, and/or quality of product by the supplier led to this benefit payment change.

The Fuel Program Statute (Title 33 Chapter 26) was amended by Act 88 on 4/29/10 to require: "No later than September 1, 2011, the secretary of human services or designee shall implement a payment system to pay fuel benefits to certified fuel suppliers after the fuel is delivered or, for metered fuel and regulated utilities, after the beneficiary's account has been billed." The "fuel dealer secure web portal" being developed will roll-out in two phases: Phase 1 in FFY2012 will provide for the transfer of client benefit documentation only; Phase 2 in FFY2013 will include the "payment-after-delivery" function.

If you don't have a firm plan for averting fraud when dealing with unregulated energy vendors, please describe how the State is ensuring program integrity.

Seasonal Fuel Assistance

N/A. The current "Fuel Supplier Certification" of fuel and energy suppliers (including regulated utilities) helps to avert fraud by non-existing entities. The current dual monitoring system of "Refund Reports" and client self-interest monitoring provides an acceptable system to identify fraud committed by suppliers who have been certified by the Fuel Office.

Necessary outcomes from these systems and strategies

Participating vendors are thoroughly researched and inspected before benefits are issued.

Vermont Outcome: Certified fuel suppliers are reviewed and approved for certification prior to the issuance of seasonal fuel benefits. Fuel and energy suppliers of crisis fuel assistance receive benefit payments only after product is delivered or a client account has been credited.

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

Describe State FY2011 policies continuing in FY2012 for verifying the authenticity of energy vendors being paid under LIHEAP, as part of the State's procedure for averting fraud.

Seasonal Fuel Assistance

Applicants for Seasonal Fuel Assistance identify their fuel supplier on their application for assistance. Suppliers, including regulated utilities, are certified by the Office of Home Heating Fuel Assistance after original, signed and dated acceptable documentation is submitted to the Office. A bank account "pre-note" test is run to verify the supplier's bank account. When the existence or authenticity of a dealer is questioned additional information is sought either from the dealer or the Secretary of State's Office and public records.

Crisis Fuel Assistance

Community action agencies work directly with fuel and energy suppliers. Only those suppliers who receive a purchase order for a crisis fuel delivery or account credit (on a client's regulated utility bill) will receive a LIHEAP payment from the community action agencies' business office when proper documentation is submitted.

Please highlight any policies for verifying vendor authenticity which will be newly implemented in FY2012.

None being implemented in FFY2012.

If you don't have a system in place for verifying vendor authenticity, please describe how the State can ensure that funds are being distributed through valid intermediaries?

N/A

Necessary outcomes from these systems and strategies

An effective process that effectively confirms the existence of entities receiving federal funds.

TRAINING AND TECHNICAL ASSISTANCE

In regards to fraud prevention, please describe elements of your FY2011 plan continuing in FY2012 for training and providing technical assistance to (a) employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors.

Seasonal Fuel Assistance

Economic Services Division Benefit Program Specialists (BPSs) are responsible for eligibility determination for Seasonal Fuel Assistance. Through their work with SNAP, TANF, Medicare and Medicaid these BPSs are trained on the fraud referral process through their supervisors to the ESD Fraud and Quality Control Unit.

Clients are advised when they sign their application or review for ESD benefits that they are subject to the "Rights and Responsibilities" identified in the application packet including: fraud penalties, quality control review, benefits from another state, true and complete information, and reporting changes.

Fuel suppliers certified by the Office of Home Heating Fuel Assistance agree to report "Multiple Benefits" received for a single fuel storage system.

The Fuel Assistance Office annually reminds and advises fuel suppliers and other interested persons that they are encouraged to refer to the Fuel Assistance Program Chief matters related to fraud or program abuse by any parties directly

Crisis Fuel Assistance

Crisis Fuel workers at the five community action agencies receive annual training in Crisis Fuel eligibility determination including fraud prevention. If issues related to fraud or quality control are identified in one agency, all agencies are advised pro-actively of the situation and appropriate remedies to be taken.

Clients are advised of their rights and responsibilities for obtaining Crisis Fuel Assistance by each of the five community action agencies of the

Please highlight specific elements of your training regiment and technical assistance resources from your plan which will represent newly implemented in FY2012.

None to be newly implemented in FFY2012

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.

Not applicable.

Necessary outcomes from these systems and strategies

The timely and 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 FY2011 that will continue into FY 2012.

Crisis Fuel Assistance

Vermont's Crisis Fuel Assistance Program is operated by the state's five community action agencies under grant agreements with the Office of Home Heating Fuel Assistance. The Fuel Assistance Program Chief conducts program reviews mid-season with two or three of the five agencies annually. Each agency is reviewed no less frequently than once every two years. Sample cases are selected for a detailed review of eligibility determination. Crisis Fuel Coordinators and the agency Executive Director are informed of the findings and any corrective action needed. Depending on the finding the Fuel Chief will issue a clarifying memo that can be circulated to all staff with the particular agency and to the Crisis Fuel Coordinators at the other agencies.

Crisis Fuel training is provided to all agencies prior to the start of the Crisis Fuel season (last Monday in November). Throughout the season monthly conference calls are conducted between the Fuel Office and Crisis Fuel Coordinators from each agency to identify, discuss and clarify any problems or issues that are being experienced.

The five Community Action Agencies receive block grant funding from the State Office of Economic Opportunity (OEO) which is also in the Vermont Department for Children and Families. OEO conducts annual financial and business practice audits of the agencies and those audits include the administration of LIHEAP funds for Crisis Fuel Assistance.

Please describe new policies or strategies to be implemented in FY2012.

None to be newly implemented in FFY2012

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.

Not applicable.

Necessary outcomes from these systems and strategies

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.

No additional information is attached.

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 hour 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.
