

ATTACHMENT 5

**WISCONSIN HOME ENERGY ASSISTANCE PROGRAM (WHEAP)
INTEGRITY ASSESSMENT SUPPLEMENT**
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 Grantees' FY2011 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): WISCONSIN	Date/Fiscal Year: 2012
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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, 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 FY2012.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
The Legislative Audit Bureau conducted an audit during the 2011 program year. The final report has not yet been received. Prior to that, the last audit was conducted by the Legislative Audit Bureau for FY2008. There were no findings of weaknesses, questioned costs, or other findings cited in the audit.	n/a	n/a	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

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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 2011 strategies that will continue in FY 2012 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 2012.	If you don't have a firm compliance monitoring system in place for FY 2011, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<p>The State of Administration, Division of Energy Services (DES) conducts regular monitoring of its grantees via onsite Administrative Reviews as well as regular Desktop Monitoring.</p> <p>The Administrative Review process was revised during the 2011 program year and covers areas related to contract compliance, program operations, program integrity, staffing, planning, protection of applicants' personal and identifiable information, quality assurance, reporting and claims, and fraud.</p> <p>Ongoing Desktop Monitoring includes, but is not limited to, the following areas: production activity, outreach activity, address integrity, accuracy of income (and types) reported, categorical eligibility, invalid Social Security Numbers, citizenship status, extraordinary low and high fuel usages reported, incomplete</p>			<p><i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i></p>

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<p style="text-align: center;">-Continued-</p> <p>and canceled applications, client complaint trends, current system access and user security, and overall worker documentation. When variations are discovered, the local agencies are contacted to correct the problems. Many of these inquiries are conducted before benefits are issued to applicants, and questioned cases are set aside from payment until the problem is corrected.</p> <p>Together these methods allow DES to determine sound practices for administering the program.</p>			

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FRAUD REPORTING MECHANISMS			
For FY 2011 activities continuing in FY 2012, 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.	Please highlight any tools or mechanisms from your plan which will be newly implemented in FY 2012, and the timeline for that implementation.	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.	Necessary outcomes of these strategies and systems
<p>The public can report fraud, inappropriate payments, waste, and abuse in a variety of ways including: directly reporting to the local administering agency; contacting the Division of Energy Services' (DES) toll free line (866-432-8947); sending letters to the DES; email DES by visiting our website (homeenergyplus.wi.gov), or directly (Heat@wisconsin.gov); contacting their state legislator; or contacting the Governor's office. We currently encourage stakeholders, vendors, and local organizations to establish lines of communication with the local office administering LIHEAP through our requirement of local coordination plans. Local coordination efforts are intended to encourage not only services to needy households but also to provide a way for other community resources and stakeholders to identify potential cases of abuse.</p>	<p>No new tools are proposed to garner public reports of fraud and inappropriate payments.</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>

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VERIFYING APPLICANT IDENTITIES			
Describe all FY 2011 Grantee policies continuing in FY2012 for how identities of applicants and household members are verified.	Please highlight any policy or strategy from your plan which will be newly implemented in FY 2012.	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.	Necessary outcomes from these systems and strategies
Identities are verified by visual inspection of the Social Security cards or official government documents identifying the person by name and showing the agency printing of the Social Security number for all members of the household. Further, all new applicant case heads must provide photo identification when applying for benefits.	A data exchange agreement between the Social Security Administration (SSA) and the Wisconsin Department of Administration has been established, which will allow the Division of Energy Services (DES) to access SSA data to administer its Low Income Home Energy Assistance Program (LIHEAP). Activities are underway to incorporate the output of the data exchange with our Wisconsin Home Energy Assistance Program (WHEAP) system. At this point, we cannot predict an implementation date.		<i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i>

SOCIAL SECURITY NUMBER REQUESTS			
Describe the Grantee's FY 2012 policy in regards to requiring Social Security Numbers from applicants and/or household members applying for LIHEAP benefits.	Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of FY2012, or remaining the same.	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.	Necessary outcomes from these systems and strategies
Wisconsin has required Social Security Numbers for all household members for several years. Households not providing SSNs for all household members have not completed the application and will not be paid. [A Social Security number (SSN) is	The policy will remain the same with the potential of verification with the Social Security Administration (SSA), as referenced above in the "VERIFYING APPLICANT IDENTITIES" section.		<i>All valid household members are reported for correct benefit determination.</i>

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<p align="center">-Continued-</p> <p>required for the case head and all persons in the household regardless of age. Section 2.1.3 of the Wisconsin Home Energy Assistance Program and Operations Manual]</p>			

CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES			
Describe if and how the Grantee used existing government systems and databases to verify applicant or household member identities in FY 2011 and continuing in FY 2012. (Social Security Administration Enumeration Verification System, prisoner databases, Government death records, etc.)	Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in FY 2012.	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.	Necessary outcomes from these systems and strategies
<p>The Wisconsin Division of Energy Services (DES) did not use existing government systems and databases to verify applicant or household member identities in FY 2011. DES did make substantial progress in securing a data exchange agreement between the Social Security Administration (SSA) and the Wisconsin Department of Administration has been established, which will allow DES to access SSA data to</p>	<p>See information referenced above in the "VERIFYING APPLICANT IDENTITIES" section.</p>	<p>DES hopes to be able to implement this new strategy during the 2012 program year. Until the data exchange agreement with SSA is implemented, DES will continue to perform Desk Monitoring in relation to Social Security Numbers and citizenship status as referenced, above, in the "COMPLIANCE MONITORING" section.</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>

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<p align="center">-Continued-</p> <p>administer its Low Income Home Energy Assistance Program (LIHEAP).</p>			

VERIFYING APPLICANT INCOME			
Describe how the Grantee or designee used State Directories of new hires or similar systems to confirm income eligibility in FY 2011 and continuing in FY 2012.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2012.	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?	Necessary outcomes from these systems and strategies
<p>The Wisconsin Division of Energy Services (DES) has attempted, but been unsuccessful in securing access to other State Department databases such as Department of Workforce Development which would allow querying of new hires and employer reported wage information to confirm income eligibility.</p>	<p>DES will again pursue gaining access for purposes of confirming income eligibility.</p>	<p>In the meantime, the current policies will remain the same for worker inspection of income documents including, but not limited to: pay stubs/ statements, award letters, tax returns, W-2s, and bank statements.</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></p>

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PRIVACY-PROTECTION AND CONFIDENTIALITY			
Describe the financial and operating controls in place in FY 2011 that will continue in FY 2012 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 2012.	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>The Wisconsin Division of Energy Services (DES) limits access to the database that contains applicant information. Wisconsin does not share applicant information with outside organizations, limits internal use to the energy programs operated, or evaluated by the State, and limits any external use to programs operated in conjunction with energy assistance (arrearage reduction programs conducted by fuel providers). Wisconsin expressly requires safe guards of confidentiality in the contract with local agencies, Article 26. DES has also limited the visibility of the Social Security Number and other personally identifiable information from all but the necessary local agency worker.</p>	<p>DES will implement two new strategies in FY 2012 to enhance privacy-protection and confidentiality:</p> <ol style="list-style-type: none"> 1. Release a new policy entitled "Contracted Agency Guidelines for Handling Sensitive Data" (Appendix A – draft guidelines). All agencies must be compliant by the start of the 2012 heating season (October 1, 2011). 2. Review compliance with the above policy as part of local agency Administrative Reviews. 	<p>n/a</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

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LIHEAP BENEFITS POLICY			
Describe FY 2011 Grantee policies continuing in FY 2012 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 2012.	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>The Wisconsin Division of Energy Services (DES) has several control factors in place to protect against improper payments. Some of these policies include: the Wisconsin Home Energy Assistance Program (WHEAP) system automatically calculates the amount of the benefit based on application data entered (workers do not manually calculate benefit amounts, nor do they have the authority to make changes to the benefit amount) and DES pays the energy vendors directly which reduces the incentive and opportunity for inappropriate payments. Only a relatively small number of applicants receive direct payments and this is limited to households that do not have an account with a vendor (landlord pays the heat) or the household burns wood. The system for determining benefits uses several factors such as household income, annual energy costs, number of rooms in the dwelling, type of fuel, and the number of eligible household members. The use</p>	<p>DES will strengthen its Internal Quality Assurance Review Policy for Emergency Furnace Program review at the local level, defining the percentage of cases which must be reviewed for both furnace repairs and replacements.</p> <p>DES will also create a WHEAP Quality Assurance tool, mini-guide and training curriculum for overall Internal Quality Assurance Reviews at the local level. It is anticipated that starting with FY2013; DES will require a comprehensive WHEAP Quality Assurance Plan from each grantee.</p>	<p>n/a</p>	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

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<p align="center">-Continued-</p> <p>of many factors to calculate the benefit makes anticipating the potential benefit difficult for an individual to adjust factors to increase the benefit amount.</p> <p>DES uses address checking software to ensure addresses are real, are used for residential purposes, and represent the actual residence of the applicant.</p> <p>To the extent systems are available DES takes advantage of utility operated information systems to verify annual fuel use, address, and account numbers. Three out of the five Class A utilities in Wisconsin currently have web portals which allow workers to get accurate and current usage and payment information.</p> <p>DES also has a required Internal Quality Assurance Review Policy for Emergency Furnace Program review at the local level. Enhancements will be made to this policy for FY 2012.</p> <p>As mentioned previously, DES</p>			

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<p align="center">-Continued-</p> <p>has implemented a new local agency Administrative Review process which directly covers the topics of applicant and worker fraud.</p> <p>Local agencies are instructed to turn all indications of deceit and fraud to the local fraud unit for additional investigation and potential prosecution as well as report to DES.</p>			

PROCEDURES FOR UNREGULATED ENERGY VENDORS			
Describe the Grantee's FY 2011 procedures continuing in FY 2012 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 2012.	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
<p>All vendors must register with the Wisconsin Home Energy Assistance Program (WHEAP) by submitting a complete and signed vendor agreement before any payments will be made to the vendor. The vendor access to the WHEAP system is limited and does not allow vendors to enter information into the system.</p>	<p>The Vendor Agreement has been revised for FY 2012 (Appendix B).</p> <p>DES plans to add regular review of vendor payments to the current Desk Monitoring Review. This review will consist of selecting a sample of applicants and asking the vendor to submit account statements which reflect WHEAP benefits applied to the accounts. This cross reference</p>	<p>n/a</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>

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<p align="center">-Continued-</p> <p>Vendor payments are WHEAP system generated and based on approved applications.</p> <p>All vendors in Wisconsin must sign the standard vendor agreement after which they are placed on a registered vendor list. Over the years, Wisconsin believes that problem vendors have been eliminated from the list.</p>	<p align="center">-Continued-</p> <p>will help to ensure that payments are being properly accounted for.</p>		

VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2011 policies continuing in FY 2012 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 2012.	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>Vendors are only allowed to participate in the program (become eligible to receive payments) after referral by a local energy assistance agency and completion of a vendor agreement and information sheet.</p>	<p>See information above in the "PROCEDURES FOR UNREGULATED ENERGY VENDORS" section.</p>	<p>n/a</p>	<p><i>An effective process that effectively confirms the existence of entities receiving federal funds.</i></p>

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<p align="center">-Continued-</p> <p>Vendors can only be entered into the system by Wisconsin Division of Energy Services (DES) staff. Very few changes occur in the approved vendor list from year to year. The most common type of generally relates to the consolidation of vendors, not the addition of new vendors. Changes in the vendor information are only made after receipt of a written document.</p>			

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TRAINING AND TECHNICAL ASSISTANCE			
<p>In regards to fraud prevention, please describe elements of your FY 2011 plan continuing in FY 2012 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 regiment and technical assistance resources from your plan which will represent newly implemented in FY 2012.</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 Wisconsin Division of Energy Services (DES) conducts a two day 'Intake Training' program to provide local energy assistance staff with a detailed overview of eligibility criteria and procedures for taking applications. This program addresses some key issues related to prevention of fraud, waste, abuse, and issuance of improper payments.</p> <p>Each August DES conducts an 'Update' session for local energy assistance staff, utility staff, and staff of other stakeholders. This session focuses on changes for the coming heating season, specific policy changes, procedural changes, problems identified in monitoring that need to be addressed, and topics of special interest. Most of the discussion is focused on policy and procedures and is intended to avoid improper payments and avoid fraud.</p> <p>Each winter (usually in February) Wisconsin conducts a 2 day training conference. This conference has many purposes, but one of the underlying aims is to help local staff to understand and follow the program policies and procedures. As staff better understand policy and procedures, they help identify and</p>	<p>New training efforts for FY 2012 include:</p> <p>A two day 'WHEAP Coordinator' training program geared towards effective administration at the local level.</p> <p>A webinar training launching the new Internal Quality Assurance Review policy, tool and mini-guide referenced above in the "LIHEAP BENEFITS POLICY" section.</p>	<p>n/a</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

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<p align="center">-Continued-</p> <p>prevent fraud and inappropriate payments.</p> <p>Wisconsin has an annual training contract with Wisconsin Energy Conservation Corporation (WECC) to organize and operate designated training events and special topic training events of interest to workers throughout the state. In addition, DES has implemented a 'rapid response' training effort used to deal with local agencies where DES Compliance Monitoring efforts have identified issues, weaknesses, or new staff training needs.</p> <p>Not as a direct part of our training effort, but as a large part of our efforts to improve local staff's ability to avoid improper payments, DES operates a Help Desk dedicated to responding to questions and needs of local energy assistance program staff and vendor staff.</p> <p>This provides DES staff the opportunity to directly intervene in problems and to understand issues that should be addressed in other training areas.</p>	<p align="center" style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">DRAFT</p>	<p align="center" style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">DRAFT</p>	

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<p align="center">-Continued-</p> <p>A portion of what DES staff does on-site during agency visits is providing training and technical assistance to the local agencies.</p> <p>DES also uses its email system to send out special training advice to all workers when there is a need, when changes occur, and when reminders are appropriate.</p>			

AUDITS OF LOCAL ADMINISTERING AGENCIES			
<p>Please describe the annual audit requirements in place for local administering agencies in FY 2011 that will continue into FY 2012.</p>	<p>Please describe new policies or strategies to be implemented in FY 2012.</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>The contract with the local agencies (counties and tribes) sets forth the audit requirement of Wisconsin and of the Single Audit Act. Article 29 of the contract sets forth the audit requirements. These requirements have been in place and will be continued.</p>	<p>No new procedures planned for FY 2011.</p>	<p>n/a</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

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.

See attached Appendix A – draft guidelines, “Contracted Agency Guidelines for Handling Sensitive Data”

See attached Appendix B – draft FY 2012 Vendor Agreement

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