OFFICE OF COMMUNITY SERVICES

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Chairman, Joseph J. Brings Plenty, Sr.

September 10, 2010

Lauren S. Christopher, Esq., M.P.P. Energy Program Operations Branch Chief Division of Energy Assistance Office of Community Services Administration for Children and Families 370 L'Enfant Promenade, S.W., 5th Floor West Washington, D.C. 20447

Dear Ms. Christopher,

The Cheyenne River Sioux Tribe (CRST) submits its FY 2011 Plan with this letter that serves as our own Program Integrity Assessment Supplement. This letter corresponds to the questions and descriptions laid out by the document labeled "Attachment 1 SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE, Low Income Home Energy Assistance Program (LIHEAP)" as follows:

1. RECENT AUDIT FINDINGS

The CRST submits its most recent audit and is resolving any issues associate therewith.

2. COMPLIANCE MONITORING

The CRST has recently adopted a stringent monitoring policy which was developed by the CRST to more closely monitor financial and other aspects of administering the LIHEAP Program. The LIHEAP Director, the agent primarily responsible for CRST-LIHEAP administration, does monthly compliance checks with her supervisor(s), namely CRST Administrative Officer, Harold Condon. An attorney will also be available to assist with compliance questions or issues made present at these meetings that occur at least once per month but as frequent as is necessary. See attached Corrective Action Plan

3. FRAUD REPORTING MECHANISMS

CRST finance operations are sufficient to provide proper oversight, and fraud reporting if necessary, to the LIHEAP Program as it reconciles CRST LIHEAP's financial information on a monthly basis. The Finance Department of the CRST has a duty to report any improper occurrences to the Chairman of the CRST.

4. VERIFYING APPLICANT IDENTITIES

The CRST LIHEAP Director personally verifies income and identity by requiring copies of drivers' licenses, tribal identification cards, check stubs or other reported, earned and unearned, income.

5. SOCIAL SECURITY NUMBER REQUESTS

The CRST LIHEAP Program requires a social security number from its potential applicants to avoid any improper benefit determinations.

6. CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES

The CRST cross checks, as necessary, applicant information with information made available by the CRST Housing Authority; a majority of CRST-LIHEAP beneficiaries are associated with this Tribal public housing provider administering federal funds.

7. VERIFYING APPLICANT INCOME

The CRST LIHEAP Program requires recent income verification documents, earned and unearned, from each of its applicants. The applicants bring original documents and file-copies are made for the applicant files.

8. PRIVACY PROTECTION AND CONFIDENTIALITY

All information is treated sensitively and confidentially. The CRST LIHEAP Director is the only person with access to all of the electronic information pertaining to applicants. All other sensitive and non-sensitive information is kept in hard copy in secure offices which are lock and key accessible by only the LIHEAP Director, file clerk and the LIHEAP Director's supervisors.

9. LIHEAP BENEFITS POLICY

The CRST LIHEAP Program has developed a comprehensive and effective benefits determination matrix. *Please see attached matrix*

10. PROCEDURES FOR UNREGULATED ENERGY VENDORS

The CRST LIHEAP Program has consistent compliance cooperation with its limited fuel suppliers on the reservation. Each of the three vendors is required to sign a vendor agreement assuring that they will comply with CRST LIHEAP Policies and Regulations. *Please see attached sample vendor agreement*.

11. VERIFYING THE AUTHENTICITY OF ENERGY VENDORS

The CRST LIHEAP Program has consistent compliance cooperation with its limited fuel suppliers on the reservation. Each of the three vendors is required to sign a vendor agreement assuring that it will comply with CRST LIHEAP Policies and Regulations. Each vendor is also required to obtain a CRST Official Tribal License to do business within the exterior boundaries of the reservation, on which vendors disclose information identifying corporate name and state of incorporation. *Please see attached sample vendor agreement*.

12. TRAINING AND TECHNICAL ASSISTANCE

As part of the Corrective Action Plan (attached) the CRST LIHEAP provides training as necessary to any intake agents. The current CRST LIHEAP Director and intake agent were trained in the proper calculation methods and use of the 2010 benefit determination matrix by the attorney that developed the matrix. Any new intake agents or others will be trained by the CRST LIHEAP Director. Any new training beyond the matrix and Corrective Action Plan will be done on an as needed basis.

13. AUDITS OF LOCAL ADMINISTERING AGENCIES

The CRST LIHEAP Program does not use any other entities to administer its services.

Please feel free to contact Anita Thompson, CRST LIHEAP Director, or myself at 605.964.8384 with any questions or needs for further correspondence.

Respectfully,

Joseph Brings Plenty, CRST Tribal Chairman