Attachment 1-2 - Chapter 13 - Monitoring Program Compliance

I.   Introduction

Monitoring is the process by which State OHEP periodically reviews the implementation of regulations, policies and procedures as set forth in COMAR, the Operations Manual, and transmittals issued by the OHEP office. It, also, is used to assess the fulfillment of contractual obligations.

The purpose of monitoring is:

- To assure implementation and adherence to regulations, policies and procedures as promulgated by State OHEP.
- To fulfill the requirement of the Federal Block Grant for Low Income Home Energy Assistance (Public Law 97-35, sec. 2605(b10)) for a regular review of all local administrating agencies' (LAA) program operations.
- To protect applicant's rights and insure good public service.
- To identify potential programmatic or procedural issues that may require revised policies.
- To prevent future audit issues.

These monitoring visits are an opportunity to help local agency staff assess program operation procedures. State program management can learn about local problems with the Operation Manual procedures. Sometimes these visits lead to program clarification of operation procedures. During the year of the visit, changes in procedure replace the old ones by means of special additions to the Operations Manual called "Transmittals".

II.   Procedures

A. A monitoring staff person contacts an LAA or energy supplier to schedule an appointment for an on-site visit. In the case of an LAA, the person contacted is the OHEP director or coordinator. It is the responsibility of the local OHEP director to inform other pertinent agency personnel of the visit.

B. A letter confirming the date and purpose of the visit is sent along with a copy of the monitoring tool.

C. The visit will consist of an initial entrance meeting with the OHEP director and appropriate staff explaining the purpose of the visit and what can be expected.

D. State OHEP monitoring staff will conduct the specific monitoring interview and review records randomly selected as appropriate. A sample of the local agency files are reviewed in each stage of application processing: pending, certified, paid, denied, and crisis.

E. After completion of the interview and record review the monitoring staff shall conduct an exit conference with the OHEP director and other pertinent staff. It is recommended that the agency director be present at the exit conference. During the exit conference the monitoring staff will identify findings and suggest strategies for corrective action if problems are found. A copy of the monitoring visit report is left with the LAA at the completion of the visit.

F. The state office will send a follow-up letter summarizing the visit findings and suggesting corrective actions the local agency must do to correct any findings that did not meet standards or requirements. If the findings warrant, a written corrective action plan will be requested of the local agency. Additional follow-up may be required to assure implementation of the corrective action plan.

G. The State OHEP Office maintains a record of correspondence, interviews and any documentation from the field review.

APPENDIX G – OHEP MONITORING TOOL

DEPARTMENT OF HUMAN RESOURCES

FAMILY INVESTMENT ADMINISTRATION

OFFICE OF HOME ENERGY PROGRAMS (OHEP)

LOCAL ADMINISTERING AGENCY (LAA) MONITORING REPORT

MARYLAND ENERGY ASSISTANCE PROGRAM (MEAP)

And

ELECTRIC UNIVERSAL SERVICE PROGRAM (EUSP)

FY 2014

SITE VISIT FINDINGS

LAA: _____

DATE OF VISIT: _____

Contact Person(s) for this review (include phone number):

    1. _____

    2. _____

Exit Interview with (include phone number): _____

        Title: _____

OHEP Monitor(s): _____

                _____

Where appropriate, please write in yes or no.

OUTREACH:

1. What has the agency done to reach the following populations?

    A. Elderly/disabled population:

        Comments: _____

        _____

    B. Persons with the lowest incomes with the highest energy burdens:

        Comments: _____

        _____

2. What is your most effective outreach tool?

    Comments: _____

    _____

Local Training:

1. How often are staff meetings held? _____

2. Have all workers been trained in confidentiality and computer security? _____

3. How many OHEP dedicated workers does your agency have? FT _____   PT_____

4. Are the following logs current?
      a. Complaint Log   _____
      b. Hearing Log   _____
      c. Other: ....   _____

Intake and Eligibility Process:

1. Does the Agency have interview space that assures confidentiality? _____

2. Are there restrooms available for use by applicants? _____

3. Are the applications filled out and printed in the data base for the customer? _____

4. Are interviews being scheduled by appointment? _____

5. What is the average length of an interview? _____

6. What are the major issues in collecting and verifying income information?
   Comments/Issues of Concern: _____

   _____

7. Are customers files kept in a confidential and secure area? _____

8. What measures are used to ensure confidentiality with applications filed by employees?

   _____

   _____

SAIL (Service Access and Information Link) Applications:

1. Are you receiving any SAIL applications? _____

2**.** Who retrieves the SAIL applications for your agency? _____

3. How are the applications tracked? _____

   _____

4. What are the major issues/concerns in processing the applications?

   Comments: _____

Applicant Pending Procedures:

1. Number of applications pending computer data entry today: _____

	MEAP	**EUSP**
2. Number of applications awaiting certification:	_____	_____
3. Number of applications pending household information:	_____	_____

4. Where are your pending files?

   _____

5. How are files pending agency action or household information tracked?

   _____

6. How many applications are pending over 45 days from the date of the monitoring visit? ____

Denial Procedures: MEAP   EUSP

1. The percentage of denials to applications taken is   _____%   _____%
   (OHEP will calculate the percentage by dividing the type of applications taken into the number of denials.)

2. The main reason for denials is _____

Potential Fraud Situations:

1. Have any potential or actual fraud cases been reported?
   If yes, give further information:
   _____

   _____

2. How many fraud cases been referred to Office of Inspector General (OIG)? _____

3. Are the fraud posters visible? _____

4. What local special measures are used to prevent fraud?
   _____

   _____

Fiscal Administrative Expenditures:

1. Are current signed financial monthly reports on file?

   With the Program Director? _____
   With the Fiscal Office?   _____

2. What is the status of last year's audit? Read OHEP part of audit.
   Comments:

3. How many appeals requested? _____

Utility Company Contact Procedure:

1. Who is your LAA's local utility company?   _____

   _____

2. What is your LAA's process for obtaining customer kilowatt-hour, therm usage and arrearage information from the local electric company?
   _____

   _____

Computer Information:

1. Have you/your staff been experiencing any connectivity difficulties? If yes, please detail.

    _____

    _____

2. What is the number of data entry workstations that your LAA has operational? _____
    Comments/Issues of Concern:

3. Do all workers using the OHEP data system have their own log-on? _____

4. Have log-on it's for all former employees been deleted? _____

Monitoring for Contract Deliverables:

Are the following contract deliverables current and on file at the state OHEP office?
        a. Annual Outreach Plan   _____
        b. Monthly Outreach Logs   _____
        c. Annual Crisis Plan   _____

SAMPLE REVIEW
Does the sample of certified applications (both mail-in and regular) by categories listed
Below meet the Minimum State standards?

       95% accuracy to determine eligibility/grant and
       90% accuracy in transcribing information in the applicant file
       (See the summary and worksheets for applicant file review)

Sample categories are:
1. Wage earners (at least 3)
2. Fixed Income (at least 3)
3. Zero Income (at least 2)
4. Energy Crisis Assistance (at least 2)
5. Subsidized Housing (at least 2)
6. Renters where heat is included in the rent (at least 2)
7. Renters where heat is not included in the rent (at least 2)
8. Roomers and/or boarders (at least 1)
9. Self-employed (at least 1)
10. Level 1 Utility user (at least 1)
11. Direct payment (at least 2)

DOES THE SELECTED SAMPLE REVIEW?

1. Assure that households applying for energy crisis grant receive assistance
   within the specified time frames?   _____

2. Confirm that local internal control system assures that services are provided
   only to eligible participants?   _____

3. Confirm that homeowners and renters are treated equitably?   _____

4. Confirm that assistance was provided to households with the lowest income
   that pays a high proportion of their income for home energy?   _____

5. Confirm that all recipient households received a notification of the amount of their
   assistance and the name of the energy supplier?   _____

6. Is the LAA following Operations Manual procedures in the
         a. Application Process   _____
         b. Crisis Assistance Application Process   _____
         c. Utility Service Protection Program   _____
         d. Zero income applications   _____
         e. Family Energy Services (FES) procedures

         _____
         f. Applicant file organization   _____
         g. Quality Control (Certification Procedures)   _____

Summary Sheet-Certified File Review:

Sample size _____

I. Applicant's documents compared with data management system data file's hard copy or household notification letter.

    1. Name, address, etc. consistent _____

    2. Supplier name, code, fuel type consistent _____

II. Application, Income Area, Documentation Review

    3. Proof of identity _____

    4. Proof of residence _____

    5. Number in household consistent with documents (income) _____

    6. SS cards/SS verification for all adults and children _____

    7. Documentation recorded correctly _____

    8. Household numbers consistent _____

    9. Dated legible signatures of two different LAA staff; no initials or last name only_____

    10. Dated household benefit notification letter in file or available on the database _____

    11. Kilowatt and/or therms recorded correctly and if not in the file referenced on the back of the application as to its location _____

    12. Application completed _____

Total _____

*ADMINISTRATIVE ERROR RATE IS _____%

III. Accuracy of Computations and Documentation of Eligibility

    1. Sufficient documentation _____

    2. Income transcribed accurately _____

    3. Grant amount correct _____

Total _____

PAYMENT ERROR RATE IS _____%

* **Administrative error rates are calculated by dividing the sample size x 12 into the sum of errors**.

**Payment error rates are calculated by dividing the sample size x 3 into the sum of errors.

GENERAL COMMENTS SECTION

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   P. Watson

PPLICATION/CERTIFIED: PAID FILES

LAA: _____

DATE: _____
Code: Yes - Blank   No - X   Sample Size: _____

APPLICANT NAME	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	COMMENTS