

suppliers, except when a supplier refuses to participate or a supplier has been removed from the list of participating vendors.

Pennsylvania will make payments only to those home energy suppliers who sign a standard vendor agreement. **EXCEPTION:** Occasionally a vendor will provide service one time only. In these instances, DPW will attempt to secure a signed agreement. However, payment will not be made until after crisis service has been rendered.

8. Equitable Treatment of Renters and Owners

In accordance with Pub. L. 97-35, Section 2605(b)(8), as amended, Pennsylvania will treat owners and renters equitably. The application requirements for cash, crisis and weatherization benefits apply equally to both owners and renters and will not be limited to the categorically eligible.

9. Administrative and Planning Costs

In accordance with Pub. L. 97-35, Section 2605(b)(9), as amended, Pennsylvania's total estimated planning and administrative costs will not exceed 10 percent of the total LIHEAP funding appropriated, of which none will be transferred to any other block grant. Any administrative and planning costs in excess of 10 percent of Pennsylvania's total allocation, should they be incurred, would be paid from non-Federal sources.

10. Monitoring and Audit

In accordance with Pub. L. 97-35, Section 2605(b)(10), as amended, Pennsylvania will provide fiscal control and fund accounting procedures as necessary to assure the proper disbursement of funds, which includes monitoring payments and an annual audit of Pennsylvania's expenditures.

- Application Monitoring Procedures: All applications approved at the local agency level and forwarded for payment will be submitted for all computerized eligibility checks before payment is made.

The computerized checking process includes:

- a. Check for duplicate Social Security Numbers in existing DPW systems;
- b. Verify Social Security Numbers, Social Security benefit amounts, and death information through data exchange with the Social Security Administration;
- c. Verify Supplemental Security Income payments through the State

Data Exchange (SDX);

- d. Check for criminal information on all household members through data exchange with the Commonwealth Judicial Information System
- e. Check tax information concerning earned or unearned income through data exchange with the Internal Revenue Service;
- f. Check on family size and income;
- g. Check for cash payment above \$1,000;
- h. Check for crisis payment below \$25;
- i. Check for total crisis payment above \$500;
- j. Determination of payment;
- k. All fields must contain acceptable established elements (characters or numbers);
- l. All required fields must be completed.

Agency Monitoring Procedures: The first step of the agency's monitoring strategy begins at the County Assistance Office (CAO).

- CAO staff members involved in determining LIHEAP eligibility participate in weekly knowledge reinforcement sessions. Each LIHEAP Knowledge Reinforcement Session (LKRS) is formatted as an e-learning module to be completed during the week that the session is posted. Credit for each session is given to the staff member when all five questions are correctly answered. Staff is able to access each session posted on the Staff Development Website throughout the LIHEAP Season.
- CAO supervisors involved in LIHEAP eligibility complete a mandatory number of reviews. The number of reviews to be completed is no less than 50 and determined by the proportion of LIHEAP applications received statewide for the given season. As all review data is captured in the state's Rushmore Review system, reports that facilitate trend identification can be generated which helps the commonwealth to accumulate meaningful and detailed statewide results. Both CAOs and the Bureau of Program Evaluation monitor the results of the supervisor reviews to implement corrective action activities based on the identified trends.

- Headquarter and CAO staff involved with LIHEAP participate in Friday Calls. The Friday Calls are weekly telephone conferences that provide the counties with real-time system, policy and operational updates that affect the LIHEAP workflow. The calls also provide a means for CAOs to get answers to questions or solutions to issues encountered. The frequency of the calls became bi-weekly as of February 1, 2013.

The second step of the agency's LIHEAP monitoring strategy is the Bureau of Program Evaluation's coordination of the annual LIHEAP monitoring reviews of the Philadelphia and Allegheny CAOs, the Crisis Contractors and the CAOs selected for review based on a two-year schedule. Additional CAOs are reviewed as needed based on extenuating circumstances such as a change in processing style or prior year results. LIHEAP reviews are completed by a field-based monitoring team.

- The team monitors CAO and Crisis Contractor administration of LIHEAP activities including eligibility, benefit determination and corrective action through LIHEAP application reviews and on-site visits.
- Annually, the monitoring team reviews over 2,600 LIHEAP applications that are randomly selected through data mining techniques and random samples.
- An independent auditing agency assists in review development and modification and participates in on-site reviews to ensure objectivity in the monitoring process.
- If information is received which suggests the possibility of misuse, misrepresentation, or any abuse, the monitoring team will investigate the allegation and appropriately escalate to address any pertinent issues.
- Preliminary and updated performance reports are issued to the counties in order to provide relevant information about the accuracy and composition of findings at both the county level and at the state level.
- Corrective action plans are developed and based on the findings from the monitoring team, implemented by OIM and monitored for compliance by the Bureau of Program Evaluation.
- Between LIHEAP seasons, the monitoring team is actively involved with implementing necessary program changes that will impact program accuracy and integrity; for example, working with Staff Development in the development of LIHEAP training for the next LIHEAP season that focuses on situations found to be prone to error.

The third step in the agency's monitoring strategy involves the Bureau of Financial Operations, who provides OIM with technical assistance and conducts

performance audits of specific CAOs and crisis contractors, as needed, to resolve systemic problems.

- Audit Procedures: Pennsylvania agrees, in accordance with Pub. L. 97-35, Section 2605(e), as amended, to a financial and compliance audit by an independent agent annually, according to the Comptroller General's standards.

A copy of the audit will be submitted within 30 days after completion of the audit to the Governor, the General Assembly, and the Secretary of DHHS. The audit report will also be made available to the public on a timely basis.

11. Federal Investigation

In accordance with Pub. L. 97-35, Section 2605(b)(11), Pennsylvania will permit and cooperate with Federal investigations undertaken in accordance with Pub. L. 97-35, Section 2608.

12. Public Participation

In accordance with Pub. L. 97-35, Section 2605(b)(12), as amended, Pennsylvania provided for timely and meaningful public participation in the development of the Plan as follows:

- A notice was published in several Pennsylvania newspapers announcing the public hearings schedule and the availability of the proposed Plan for public comment. This information was also posted on the DPW website.
- The LAC advised the Secretary of DPW on the administration of the LIHEAP block grant, including a review of the proposed Plan and recommendations on the final Plan. Members of the Advisory Committee are appointed by the Secretary of DPW and represent consumer and advocacy interests, service providers, fuel associations, and other concerned citizens of the Commonwealth.
- Area Agencies on Aging, legal services groups, fuel and utility associations, community action agencies, and members of the LAC are made aware of the availability of the proposed and final Plans on the DPW website. In addition, copies of the Plan are available upon written request to Director, Division of Federal Programs and Program Management, Department of Public Welfare, DGS Annex, Room 224, Willow Oak Building, 1006 Hemlock Drive, Harrisburg, PA 17110.
- In accordance with Pub. L. 97-35, Section 2605(a)(2), public hearings on the FY 2014 LIHEAP proposed State Plan will be held as follows: