

ATTACHMENT 5
SAMPLE PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT TEMPLATE
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT:

HHS is requiring further detail from Grantees on their FY2014 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that Grantees highlight and describe all elements of this FY2014 plan which represent improvements or changes to the Grantees' FY2014 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): State Of Alaska		Date/Fiscal Year: 2014	
RECENT AUDIT FINDINGS			
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in FY2013 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 FY2014.	If there is no plan in place, please explain why not.	Necessary outcomes from these systems and strategies
<i>No issues in prior three years. We are currently being audited for FY 2013.</i>	N/A	N/A	<i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i>

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 2013 strategies that will continue in FY 2014 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 2014.	If you don't have a firm compliance monitoring system in place for FY 2014, please describe how the State is verifying that LIHEAP policy and procedures are being followed.	Necessary outcomes from these systems and strategies
<ul style="list-style-type: none"> • <i>Single Audit by legislative audit</i> • <i>5% of all seasoned workers' cases are reviewed by senior staff/Eligibility Office Manager.</i> • <i>100% of all new workers' cases are reviewed by same</i> 	Nothing new	N/A	<i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i>

FRAUD REPORTING MECHANISMS			
For FY 2013 activities continuing in FY 2014, 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 2014, 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
<ul style="list-style-type: none"> • <i>Information/Brochure on HAP website</i> • <i>Information in application packet</i> • <i>Help Us Stop Fraud Brochure</i> • <i>Reports to HAP office via phone, fax or e-mail by individuals and vendors alerting us to possible fraud situations.</i> 	Nothing new	N/A	<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>

VERIFYING APPLICANT IDENTITIES			
Describe all FY 2013 Grantee policies continuing in FY2014 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 2014.	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
<i>All applicants and household members are checked against the State's Eligibility Information System (EIS), the Dept. of Labor (DOL), Child Support and Enforcement (CSSD) databases. If the recipient receives social security, SVES is checked. For those who are self employed, they must submit tax returns.</i>	None planned	N/A	<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 2014 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 FY2014, 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
<i>Required for all household members before an award is issued.</i>	Remaining the same	N/A	<i>All valid household members are reported for correct benefit determination.</i>

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 2013 and continuing in FY 2014. (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 2014.	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><i>We will use SEVS to check proof of income, and therefore identify, for applicants who do not provide proof of social security income. As mentioned above, we also check our eligibility information system to verify the numbers.</i></p> <p><i>We also check our state's prisoner database, ACOM, to check for incarcerated applicants. This is done through a report from ACOM which is downloaded into our software system twice a month. An alert notifying the caseworker to check ACOM for more information, including dates of incarceration, pops up when they go to work the case if the applicant is on the ACOM report. This interface searches by name, DOB, and partial social security number.</i></p>	<p>Nothing new planned</p>	<p>The Program would like to have access to SOLQ for instant verification and access to social security databases but have been unable to obtain that. Any help would be appreciated.</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></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 2013 and continuing in FY 2014.	Please highlight any policies or strategies for using new hire directories which will be newly implemented in FY 2014.	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
<ul style="list-style-type: none"> • <i>We check the State's Dept of Labor database.</i> • <i>We check the State's EIS system to see what they have reported to other programs.</i> • <i>We will use SVES to verify income.</i> • <i>We will use the work number to verify income if available.</i> • <i>We also request that the client send proof of income.</i> 	<p>Nothing new</p>	<p>N/A</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></p>

PRIVACY-PROTECTION AND CONFIDENTIALITY

Describe the financial and operating controls in place in FY 2013 that will continue in FY 2014 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 2014.	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
<ul style="list-style-type: none"> • Confidentiality policies are spelled out in Alaska's Administrative Procedures Manual, Section 100-3 (see Attachment) the Heating Assistance Policy Manual Section 3000-1E, and Procedures Manuals Section 12. • The same workers who work cases do not deal with the money. Our account tech deals with money but does not process cases. • Info on cases is not shared with outside parties without a release of information or verbal permission by client to release to that party. • Confidential client information shared with anyone outside of the state is sent via a secure website. • Confidentiality is covered on page 2 of the vendor manual. 	Nothing new	N/A	Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.

LIHEAP BENEFITS POLICY

<p>Describe FY 2013 Grantee policies continuing in FY 2014 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.</p>	<p>Please highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in FY 2014.</p>	<p>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.</p>	<p>Necessary outcomes from these systems and strategies</p>
<p><i>Benefits are paid directly to vendors unless a person self-harvests wood or their heat is included in their rent.</i></p> <p><i>If their heat is included in their rent, they must submit a copy of their lease verify this fact and a copy of their rent receipt. Then the payment is made directly to the client.</i></p> <p><i>If a client self-harvests wood, they must provide receipts showing that they purchased materials to self harvest such as chain saw blades, a chain saw, gas to run the chain saw, etc.</i></p> <p><i>Vendors must confirm all payments by sending back a copy of the client's award notice with their initials and the date the account was credited noted thereon.</i></p> <p><i>Clients are required to submit a copy of their bill with their application to prove costs and to verify account information.</i></p>	<p>Nothing new</p>	<p>N/A</p>	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

PROCEDURES FOR UNREGULATED ENERGY VENDORS			
Describe the Grantee's FY 2013 procedures continuing in FY 2014 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.	Please highlight any strategies policy in this area which will be newly implemented in FY 2014.	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><i>The State has vendor agreements with each vendor.</i></p> <p><i>Each vendor must confirm all payments by sending back a copy of the client's award notice with their initials and the date the account was credited.</i></p>	<p>We are updating vendor agreements to include the collection of performance measures data. The agreement will be approved at the state level and then mailed to vendors next spring for implementation in FY 2015.</p>	<p>N/A</p>	<p><i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i></p>
VERIFYING THE AUTHENTICITY OF ENERGY VENDORS			
Describe Grantee FY 2013 policies continuing in FY 2014 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 2014.	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><i>Vendors submit their EIN and/or taxpayer ID on a W-9 form along with their vendor agreement/application.</i></p>	<p>Nothing new.</p>	<p>N/A</p>	<p><i>An effective process that effectively confirms the existence of entities receiving federal funds.</i></p>

TRAINING AND TECHNICAL ASSISTANCE

<p>In regards to fraud prevention, please describe elements of your FY 2013 plan continuing in FY 2014 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 2014.</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><i>Employee training covers expectations, boundaries and the process they should follow to bring fraud issues or concerns to the supervisor for further action.</i></p> <p><i>Long-standing relationships with vendors have fostered an environment where they feel comfortable calling the HAP unit to report any concerns they have regarding fraud or improper use of fuel. The State's expectations and proper use of benefits is clearly covered in the vendor manual which is sent out annually with our pre-season information packets.</i></p>	<p>The program coordinator began meeting with vendors in FY 2013 and will continue to do so in FY 2014. During said meeting we are discussing performance measures data collection, program rules and policies, any issues the vendor may have or questions they may have about the program. During these visits we highlight topics including fraud and encourage vendors to report fraud to us.</p>	<p>N/A</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

AUDITS OF LOCAL ADMINISTERING AGENCIES

Please describe the annual audit requirements in place for local administering agencies in FY 2013 that will continue into FY 2014.	Please describe new policies or strategies to be implemented in FY 2014.	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.	Necessary outcomes from these systems and strategies
<i>N/A – do not use outside agencies</i>	N/A	N/A	<i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i>

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.

PLEASE SEE FRAUD BROCHURE THAT IS BEING ATTACHED AS A SEPARATE DOCUMENT.

STATE OF ALASKA

FY 2014

SUPPORT DOCUMENTS FOR INTEGRITY SUPPLEMENT

Compliance Monitoring:

From HAP Procedures Manual Section 12.17

12.17 QUALITY ASSURANCE

A random sample of approved cases is reviewed daily by the Eligibility Office Manager or Lead Worker, ET III, prior to printing the vendor NOAs. If errors are found, the Eligibility Office Manager will make the necessary changes and notify the worker. Errors are logged and are used to review work quality for the office. The person checking the file initials the file copy of the NOA to indicate that the case was reviewed.

Heating Assistance Policy Manual Section addressing confidentiality and privacy:

3000-1 E. DISCLOSURE AND USE OF INFORMATION

The DPA restricts the disclosure and use of information obtained from heating assistance households to:

1. Persons directly connected with the administration or enforcement of the Heating Assistance Program.
2. Employees of other federal assistance or federally assisted State means-tested programs for low-income individuals such as TANF, ATAP, Food Stamps, Medicaid, and SSI.
3. Employees of Legislative Audit for audit examination.
4. Officials of local, State, or federal law enforcement agencies to investigate alleged violations of the Heating Assistance Program, if a written request is provided.

All information about an applicant must remain confidential. Discussing a case with a co-worker in order to complete a determination is acceptable. Discussing a case with another DPA employee involving a family member or friend is **not** acceptable. Discussing a case with a friend/acquaintance outside of the office is **not** acceptable.

All written information which specifically identifies an applicant must be properly stored in the appropriate file cabinet when not in use, and properly discarded as necessary (i.e. shredded, ripped up, burned, or archived.)

STATE OF ALASKA

FY 2014

Workers must not leave identifying applicant information exposed to office visitors.

Workers must not give applicant information to the applicant's landlord, or request applicant information from a landlord, unless the applicant authorizes it or has listed the landlord as a collateral contact. Many applicants do not want their landlords to know that they have applied for heating assistance. Workers must respect applicant privacy.

The following people may be given information regarding a case, upon request. Requests from people other than those listed must be referred to the Program Coordinator. Requests for information from newspaper or radio reporters must always be referred to the Program Coordinator.

Applicant - If an applicant calls to ask for information regarding their HAP case, the worker should ask the person to identify themselves by providing their social security number before revealing any information. The worker must ensure that the information the caller provides matches the information on the application.

Concerned Agency Representatives, Friends, Interpreters - Information may be given to third party representatives **only if** the applicant has authorized their participation and there is a justifiable reason why this person is intervening (for example, language barrier, hearing disorder, disability, etc.).

Fee Agent and Department of Public Assistance (DPA) Employees - Workers may answer questions from DPA representatives regarding specific applications.

Legislator or Legislator's Staff - Requests for case specific information in response to a constituent request may be answered by the worker. The Program Coordinator must be informed about the contact.

Ombudsman's Office - Requests for case specific information may be answered by the worker. The Program Coordinator must be informed about the contact. All other Ombudsman calls must be referred to the Program Coordinator.

Vendor - If a vendor calls to ask if one of their customers has applied for heating assistance, the answer to that question may be provided. Information regarding payment to that vendor **only** may be provided.

For specific confidentiality rights and responsibilities, refer to Division of Public Assistance Administrative Procedures Section 100-3, Alaska State Statutes 47.05.020 through 47.05.030, and Alaska Administrative Codes 7 AAC 37.010 through 7 AAC 37.130.

STATE OF ALASKA

FY 2014

Heating Assistance Procedures Manual Section addressing confidentiality and privacy

12.2 CONFIDENTIALITY

All information about an applicant must remain confidential. Discussing a case with a co-worker in order to complete a determination is acceptable. Discussing a case with another DPA employee involving a family member or friend is not acceptable. Discussing a case with a friend/acquaintance outside of the office is not acceptable.

All written information which specifically identifies an applicant must be properly stored in the appropriate file cabinet when not in use, and properly discarded as necessary (i.e. shredded, ripped up, burned, or archived.)

Workers must be conscientious about not leaving identifying applicant information exposed to office visitors.

Workers must not give applicant information to the applicant's landlord, unless the applicant authorizes it or has listed the landlord as a collateral contact. A worker may contact a landlord to learn if heat is included in the rent, if the rent is subsidized, etc. Workers should respect applicant privacy.

The following people may be given information regarding a case, upon request. Requests from people other than those listed must be referred to the Program Coordinator. Requests for information from newspaper or radio reporters must always be referred to the Program Coordinator.

Applicant - If an applicant calls to ask for information regarding their HAP case, the worker should ask the person to identify themselves by providing their Social Security number before revealing any information. The worker must ensure that the information the caller provides matches the information on the application.

Concerned Agency Representatives, Friends, Interpreters - Information may be given to third party representatives **only if** the applicant has authorized their participation and there is a justifiable reason why this person is intervening (i.e. language barrier, hearing disorder, disability, etc.).

Fee Agent and Department of Public Assistance (DPA) Employees – Workers may answer questions from DPA representatives regarding specific applications.

Legislator or Legislator's Staff - Requests for case specific information in response to a constituent request may be answered by the worker. The Program Coordinator should be informed about the contact.

Ombudsman's Office - Requests for case specific information may be answered by the worker. The Program Coordinator should be informed about the contact. All other Ombudsman calls should be referred to the Program Coordinator.

STATE OF ALASKA

FY 2014

Vendor - If a vendor calls to ask if one of their customers has applied for heating assistance, the answer to that question may be provided. Information regarding payment to that vendor only may be provided.

For specific confidentiality rights and responsibilities, refer to Division of Public Assistance Administrative Procedures, and Alaska State Statutes 47.05020 through 47.05.030, and Alaska Administrative Codes 7 AAC 37.010 through 7 AAC 37.130.

Excerpt from Vendor Manual Addressing Confidentiality (page 4 of the manual):

Confidentiality

Individuals/Households applying for and receiving heating assistance have the right to expect this information to remain confidential. All information provided by an applicant must remain confidential by all workers, vendors, employees, fee agents. Discussing a case with family or friends is not acceptable. You must also be careful to avoid leaving customer information where it can be seen by others.

You may not give any information to an applicant's landlord, or request information from a landlord, unless the applicant authorizes it in writing or has listed the landlord as a collateral contact. People may not want their landlords to know that they have applied for heating assistance and we need to respect their privacy. It is against the law to use Heating Assistance Program client information for commercial, personal or political purposes; or make information available for legal or other proceedings (except in connection with enforcement for public assistance programs).

For specific confidentiality rights and responsibilities, refer to Division of Public Assistance Administrative Procedures and Alaska Statutes 47.05.020 through 47.05.030 and Alaska Administrative Code 7 AAC 37.010 through 7 AAC 37.130.

STATE OF ALASKA

FY 2014

State of Alaska
Department of Health and Social Services
Heating Assistance Program
Vendor Agreement

PARTIES

- a. State of Alaska, Department of Health and Social Services, Division of Public Assistance, hereinafter called DPA, and
- b. _____ hereinafter called the Vendor.
(Name of Home Heating Supplier)

PURPOSE OF AGREEMENT

The purpose of this agreement is to provide for the payment of home heating costs on behalf of low-income households eligible for the Heating Assistance Program (HAP). To accomplish this the parties agree to the following terms and conditions.

DPA CONDITIONS

1. Upon certification of an eligible household, DPA shall send a written Notice of Action to the Vendor and the household. The notice will state the amount of heating assistance available to the household, and how the assistance is to be distributed among its vendors.
2. DPA shall then make a cash advance payment equal to the amount of heating assistance assigned to the Vendor on the household's behalf. DPA encourages the vendor to receive these payments electronically.
3. DPA will make heating assistance payments only for home heating products (i.e. fuel oil, electricity, natural gas, propane, wood, coal, and in some cases gasoline when used only to harvest and gather wood). Incidental charges necessary for use and delivery of home heating may be paid from an eligible household's heating assistance benefits (i.e. charges for reconnection of service, late payment, delivery, deposits or memberships).

VENDOR CONDITIONS

1. The Vendor will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment

STATE OF ALASKA

FY 2014

received from the Heating Assistance Program. If payment covers only a portion of the balance due, it must be applied to the oldest part of the bill.

2. The Vendor agrees that no household receiving heating assistance will be treated adversely because of such assistance under applicable provision of the State law or public regulatory requirements.
3. The Vendor agrees not to discriminate, either in cost of goods supplied or the services provided, against the household on whose behalf payments are made. Information about grantees and their benefits is to be confidential.
4. The Vendor will, after receipt of the written notice of a household's eligibility and upon the household's request, provide home heating fuel to the eligible household (unless such action violates established company policy). To speed up Vendor notification of a household's eligibility and the delivery of service in emergency situations, Vendors may be advised by telephone by an authorized DPA representative of a household's eligibility.
5. Vendors receiving cash advances from HAP on behalf of eligible households for overdue or future home heating bills must promptly provide verification to HAP that the payments were received and credited to the household's account. This may be accomplished by either a signed statement citing the name, date and the amount credited to the household's account, or by submitting a copy of the household's bill which shows the credited HAP payment. Once confirmation of payment is received by HAP, no further verification of the use of HAP credit is required (except as required by conditions 7 and 8 below).
6. Vendors receiving cash advances on behalf of eligible households must apply such payments only to the home energy portion of the household's account. **Vendors must list the credited HAP payment on the household's bill, invoice or statement.** Payments may be used only for approved home heating products for the eligible households own use (DPA Condition No. 3) and not for any other non-heating related charges.
7. If a household with a prepaid HAP credit balance chooses to close its service account with the Vendor, the remaining credit must be refunded directly to the household or the DPA. HAP must be notified promptly of refunds made to a household by a statement containing the household's name, amount of the refund, and the date. If the Vendor elects to make the refund to DPA, the check payable to the State of Alaska should be sent to HAP referencing the customer's name. NOTE: Vendor's are not obligated to refund HAP credit upon request of the household unless the household is closing its service account, (i.e. moving or changing home heating vendors).
8. If a household with a prepaid HAP credit balance dies, the credit balance may be left on the same service account for use by surviving family or household members. If

STATE OF ALASKA

FY 2014

there are no other persons in the household continuing to use the service account, the Vendor must promptly refund the remaining credit to the State. Similarly, if a household moves without leaving a forwarding address, the Vendor must promptly refund remaining credit to the State. If a credit balance goes unused for six months and the Vendor cannot contact the client, the credit balance must be refunded to the state.

This agreement is not effective until signed by both parties.

VENDOR

STATE OF ALASKA

Name of company as reported to the I.R.S.

Division of Public Assistance
Name of Organization

Mailing Address

400 Willoughby, Suite 301

City State Zip Code

Juneau, Alaska 99801-1700

Phone No: _____

Phone No: (907) 465-3058

FAX No: _____

FAX No: (907) 465-3319

X
Authorized Signature

Authorized Signature

Type or Print Name Above

Susan Marshall
Type or Print Name Above

Title

Program Coordinator
Title

Date

Date

Please furnish the following information for your company

Business Status:

List of communities served:

_____ Non-profit

_____ Parent

_____ Corporation

_____ Sole proprietor

List of home heating products sold:

STATE OF ALASKA

FY 2014

_____ Subsidiary _____

Name of parent co.

_____ Using Parent Tax I.D. _____

_____ Other Brand of heating products sold

(Chevron, Union, Tesoro, etc.):

Tax I.D. No: _____

Email address of Company Contact Person _____