

STATE OF WISCONSIN
Department of Health Services
Division of Medicaid Services



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DATE: 1/15/2025


ADMINISTRATOR'S MEMO

DISPOSAL DATE: Ongoing

NOTICE: 25-01

TO: County Departments of Human Services Directors
County Departments of Social Services Directors
Tribal Chairpersons/Human Services Facilitators
Tribal Economic Support Directors

FROM: Anthony Baize
Inspector General
Office of the Inspector General

Signed by:

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**FRAUD PREVENTION AND INVESTIGATION PROGRAM ALLOCATIONS AND
GUIDELINES FOR CALENDAR YEAR 2025**

PURPOSE

The Wisconsin Department of Health Services (DHS) has published Administrator's Memo 25-01 to provide information on calendar year (CY) 2025 Fraud Prevention and Investigation Program (FPIP) operations and funding. This includes

- Allocations to Income Maintenance (IM) agencies based on unduplicated caseloads.
- Key contacts in the Office of the Inspector General for FPIP, eligibility fraud investigations, Public Assistance Reporting Information System (PARIS), QUEST card trafficking, and State Law Enforcement Bureau Investigations (SLEB) inquiries.

RESPONSE REQUIRED

In order to meet contract deadlines and secure funding by January 1, 2025, county and tribal Income Maintenance (IM) agencies must designate and submit their consortium name, consortium manager, and IM agency FPIP supervisor **within 15 days of this memo's release date** at <https://survey.alchemer.com/s3/8108940/2025-FPIP-Contact-Information>. The goal of this survey link is it make it easier for IM agencies to submit and DHS to manage responses.

BACKGROUND

The FPIP model focuses on fraud prevention and supports all investigative activities under a single funding source through the efforts of IM agencies and/or private contracted investigators. This model has been in place statewide since 2011, helping state and local partners maintain:

- Direct communication channels with program integrity staff at the state level.
- Consistent entry of fraud related data.

DMS Administrator’s Memo YY-##

Click or tap to enter a date.

Page 2 of 7

- Payment error reduction.

CY 2025 FPIP

DHS has earmarked \$3 million dollars (all funds) in calendar year (CY) 2025 to support statewide fraud prevention and investigation activities in the MA, BC+, and FS programs for all FPIP agencies, except Milwaukee Enrollment Services (MilES). DHS will allocate an amount based on each agency’s percentage of the statewide IM caseload for 2025. If IM agencies contribute additional non-IM funding to FPIP, all allowable costs within the total local contribution will be eligible for federal match.

FPPI EXPECTATIONS

FPPI contractual expectations are contained in the DHS Consortium IM Contract. FPIP Guidelines are updated as necessary each contract year and can be found attached to this memo or at <https://www.dhs.wisconsin.gov/dms/memos/admin/index.htm>. The FPIP Consortium Manager is expected to maintain and produce any documentation relevant to the program’s administration in the event of an audit or inquiry.

FPIP consortiums may include the same agencies in IM consortiums. Under this model, one IM agency must be selected as administrative agency for each FPIP consortium. It does not have to be the same agency that leads the IM Consortium. Each consortium determines which staff will conduct FPIP investigations, utilizing agency staff, state staff, contract staff, local law enforcement, or any combination them that is most effective for each consortium. All contract and law enforcement agencies must abide by FPIP guidelines.

In accordance with current DHS policy regarding consultation with tribes, tribal agencies are the only agencies with the option to operate an FPIP independently. If a tribal agency chooses to operate independently, the tribal agency still receives an FPIP allocation.

The following table describes roles and responsibilities under the FPIP model:

FPIP Model Roles and Responsibilities		
DHS	IM Agencies	FPIP Staff
Manage contract with local agency.	Track referrals, claims, and investigations through the DHS approved investigation tracking system (BRITS).	Complete thorough fact-finding investigations and refer suspected cases of fraud for administrative or criminal proceedings.
Provide program integrity policy and process guidance for agencies as well as fraud related trainings/guidance.	Establish error-prone profiles to prevent fraud. Submit fraud referrals to investigative staff.	Enter all investigative data in the DHS approved investigation tracking system (BRITS).
Assist with the Intentional Program Violation (IPV) process.	Calculate claims for trafficking, misuse and over issuance of public assistance benefits.	Provide agency education on Front End Verifications (FEV) and Fraud investigation processes.
Deliver guidance and technical assistance on	Ensure timely and thorough reporting of actions taken on	Support Administrative Disqualification Hearing (ADH)

DMS Administrator’s Memo YY-##

Click or tap to enter a date.

Page 3 of 7

trafficking enforcement policy and processes.	cases investigated.	process for cases suspected of fraud.
Maintain statewide fraud hotline and refer cases to agencies as appropriate. The Office of Inspector General (OIG) will retain and work cases as requested per agency or upon criteria set forth by the Inspector General and/or the Governor’s Office.	Support administrative or criminal prosecution of IPV.	Attend and participate in regular meetings and program and policy update discussions with DHS.
Annually inform each FPIP consortium of their cost-benefit ratio performance.	Inform DHS of last year’s local agency contribution towards FPIP activities.	Perform and track all program integrity related activities as directed in the FPIP Guidelines.

All agencies must comply with requirements in current FPIP Guidelines (see attachment), which emphasize:

- Enhancing program integrity and reducing payment errors through fraud prevention, monitoring, and training.
- Addressing instances of fraud quickly through mitigation and containment to prevent ongoing fraud.
- Pursuing FS administrative sanctions over criminal adjudication.
- Aiming for cost neutral solutions to help ensure total administrative costs do not exceed total program savings.
- Allowing IM/FPIP consortiums and tribal agencies to designate agency staff, contracted staff, law enforcement, or any combination of them to most effectively serve as the Fraud Investigation Specialist and other FPIP staff. DHS Office of Inspector General (OIG) also offers assistance with investigations upon request.
- Monthly monitoring of FPIP performance by DHS, focusing on the cost savings ratio and the number and timeliness of completed investigations.

The consortium is not responsible for the failure to meet any guidelines when the failure arises out of a cause that directly affects the Consortium’s ability to meet its guidelines and that is beyond the reasonable control and without the fault or negligence of the consortium.

CENTRAL OFFICE CONTACTS

- **FPIP:** Contact FPIP State Contract Manager Tami Berg at (608) 266-0930 or Tami.Berg@wisconsin.gov for questions about FPIP guidelines, operations, and returning documents.
- **Eligibility Fraud Investigations:** Email DHSOIGFIRE@wisconsin.gov for assistance with member eligibility fraud investigations or employee fraud in public assistance programs administered by DHS.
- **PARIS:** Email DHSOIGPARIS@wisconsin.gov for help with detecting and deterring improper public assistance payments nationwide. OIG PARIS staff currently investigate all PARIS matches, determine overpayments, and process intentional program violations. This includes matching

DMS Administrator's Memo YY-##

Click or tap to enter a date.

Page 4 of 7

recipients with open public assistance cases in more than one state using the federal database.

- **QUEST Card Trafficking:** Email DHSOIGTRAFFICKING@wisconsin.gov assistance with the trafficking or misuse of FS benefits, such as directly or indirectly buying or selling QUEST cards for cash and/or ineligible food items.
- **SLEB:** Email DHSOIGSLEB@wisconsin.gov for assistance with suspected FS vendor fraud. Approved investigations are coordinated by OIG and conducted through an agreement with local law enforcement.

DMS Administrator's Memo YY-##

Click or tap to enter a date.

Page 5 of 7

IM Agency Unduplicated Caseload Counts (Based on January – June 2024 Data), Percentage of Statewide Caseload (Excluding MilES), and Resulting Funding for CY 2025			
IM Agency	Unduplicated Caseload Count	Percentage of Statewide Caseload	CY 2025 FPIP Funding
ADAMS COUNTY	3,726	0.6393%	\$19,180.00
ASHLAND COUNTY	2,928	0.5024%	\$15,073.00
BARRON COUNTY	7,374	1.2652%	\$37,956.00
BAYFIELD COUNTY	2,053	0.3522%	\$10,567.00
BROWN COUNTY	33,001	5.6623%	\$169,869.00
BUFFALO COUNTY	1,543	0.2647%	\$7,942.00
BURNETT COUNTY	2,620	0.4495%	\$13,484.00
CALUMET COUNTY	3,745	0.6426%	\$19,279.00
CHIPPEWA COUNTY	8,244	1.4145%	\$42,434.00
CLARK COUNTY	4,221	0.7243%	\$21,729.00
COLUMBIA COUNTY	6,441	1.1051%	\$33,154.00
CRAWFORD COUNTY	2,381	0.4086%	\$12,257.00
DANE COUNTY	57,799	9.9170%	\$297,509.00
DODGE COUNTY	10,042	1.7230%	\$51,690.00
DOOR COUNTY	3,077	0.5279%	\$15,838.00
DOUGLAS COUNTY	6,652	1.1413%	\$34,240.00
DUNN COUNTY	5,626	0.9652%	\$28,957.00
EAU CLAIRE COUNTY	14,091	2.4178%	\$72,533.00
FLORENCE COUNTY	677	0.1161%	\$3,483.00
FOND DU LAC COUNTY	11,972	2.0541%	\$61,622.00
FOREST COUNTY	1,479	0.2537%	\$7,610.00
GRANT COUNTY	5,807	0.9964%	\$29,892.00
GREEN COUNTY	3,930	0.6742%	\$20,227.00
GREEN LAKE COUNTY	2,427	0.4163%	\$12,490.00
IOWA COUNTY	2,426	0.4162%	\$12,486.00
IRON COUNTY	1,140	0.1956%	\$5,868.00
JACKSON COUNTY	3,148	0.5402%	\$16,205.00
JEFFERSON COUNTY	9,411	1.6147%	\$48,441.00
JUNEAU COUNTY	4,529	0.7771%	\$23,312.00
KENOSHA COUNTY	24,979	4.2859%	\$128,580.00
KEWAUNEE COUNTY	1,953	0.3352%	\$10,055.00
LA CROSSE COUNTY	14,364	2.4646%	\$73,937.00
LAFAYETTE COUNTY	1,823	0.3127%	\$9,382.00
LANGLADE COUNTY	3,516	0.6033%	\$18,100.00

DMS Administrator's Memo YY-##

Click or tap to enter a date.

Page 6 of 7

LINCOLN COUNTY	4,071	0.6985%	\$20,954.00
MANITOWOC COUNTY	9,460	1.6230%	\$48,691.00
MARATHON COUNTY	17,129	2.9390%	\$88,169.00
MARINETTE COUNTY	6,560	1.1255%	\$33,764.00
MARQUETTE COUNTY	2,128	0.3650%	\$10,951.00
MONROE COUNTY	6,123	1.0505%	\$31,516.00
OCONTO COUNT	4,420	0.7583%	\$22,750.00
ONEIDA COUNTY	5,071	0.8701%	\$26,102.00
OUTAGAMIE COUNTY	18,276	3.1357%	\$94,072.00
OZAUKEE COUNTY	5,978	1.0257%	\$30,771.00
PEPIN COUNTY	861	0.1478%	\$4,433.00
PIERCE COUNTY	3,704	0.6356%	\$19,068.00
POLK COUNTY	5,895	1.0114%	\$30,343.00
PORTAGE COUNTY	7,990	1.3709%	\$41,128.00
PRICE COUNTY	2,292	0.3933%	\$11,799.00
RACINE COUNTY	30,803	5.2851%	\$158,552.00
RICHLAND COUNTY	2,604	0.4468%	\$13,405.00
ROCK COUNTY	26,156	4.4878%	\$134,635.00
RUSK COUNTY	2,734	0.4690%	\$14,071.00
SAUK COUNTY	8,916	1.5298%	\$45,895.00
SAWYER COUNTY	2,581	0.4428%	\$13,284.00
SHAWANO COUNTY	5,533	0.9493%	\$28,479.00
SHEBOYGAN COUNTY	14,021	2.4057%	\$72,171.00
ST. CROIX COUNTY	7,410	1.2714%	\$38,141.00
TAYLOR COUNTY	2,602	0.4465%	\$13,395.00
TREMPEALEAU COUNTY	3,733	0.6404%	\$19,213.00
VERNON COUNTY	3,529	0.6055%	\$18,165.00
VILAS COUNTY	2,705	0.4642%	\$13,925.00
WALWORTH COUNTY	12,289	2.1085%	\$63,254.00
WASHBURN COUNTY	2,735	0.4693%	\$14,080.00
WASHINGTON COUNTY	10,438	1.7909%	\$53,728.00
WAUKESHA COUNTY	27,185	4.6644%	\$139,930.00
WAUPACA COUNTY	6,622	1.1361%	\$34,084.00
WAUSHARA COUNTY	3,303	0.5667%	\$17,001.00
WINNEBAGO COUNTY	20,487	3.5152%	\$105,455.00
WOOD COUNTY	11,886	2.0394%	\$61,181.00
BAD RIVER TRIBE	302	0.0518%	\$1,554.00
LAC COURTE OREILLES TRIBE	802	0.1375%	\$4,125.00
LAC DU FLAMBEAU TRIBE	1,001	0.1718%	\$5,153.00

DMS Administrator's Memo YY-##

Click or tap to enter a date.

Page 7 of 7

MENOMINEE TRIBE (TRIBAL)	1,628	0.2794%	\$8,382.00
ONEIDA NATION	1,045	0.1794%	\$5,381.00
POTAWATOMI TRIBE	31	0.0052%	\$157.00
RED CLIFF TRIBE	336	0.0576%	\$1,727.00
SOKAOGON TRIBE	178	0.0306%	\$917.00
STOCKBRIDGE-MUNSEE TRIBE	130	0.0222%	\$668.00
Total	582,824	100.00%	\$3,000,000.00