

**DEPARTMENT OF HEALTH SERVICES
DIVISION OF MEDICAID SERVICES
ADMINISTRATOR'S MEMO SERIES**

NOTICE: 21-02


DATE: 2/28/2021

DISPOSAL DATE: Ongoing

RE: Fraud Prevention and Investigation
Program Allocations and Guidelines for CY
2021

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

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PURPOSE

The purpose of this memo is to provide information regarding DHS Fraud Prevention and Investigation Program (FPIP) operation and funding for calendar year (CY) 2021.

This Administrative Memo provides information regarding agency allocations based on unduplicated caseloads. It also includes contact information for the State FPIP Contract Manager, and for PARIS, Trafficking and SLEB inquiries.

The Consortium should designate their 2021 FPIP Manager using the FPIP Contact form attached to this memo.

FPIP contractual expectations are contained in the Department of Health Services – Consortium Income Maintenance Contract. FPIP Guidelines referenced later in this memo can be found as an attachment to this memo at <https://www.dhs.wisconsin.gov/dhcaa/memos/admin/index.htm> and will be updated as needed for each contract year.

The Contract Manager is expected to maintain and produce any documentation relevant to the FPIP program administration in the event of an audit or inquiry.

BACKGROUND

The FPIP model focuses on fraud prevention and supports all investigation activities under a single funding source by utilizing local agency and/or private contracted investigators.

This model has been in place statewide since 2011. The FPIP has helped DHS and local income maintenance (IM) agencies to maintain:

- Consistent entry of fraud related data
- Payment error reduction

CY 2021 FRAUD PREVENTION AND INVESTIGATION PROGRAM

DHS has earmarked \$2,000,000 (all funds) to support statewide fraud prevention activities in all agencies that administer Wisconsin FoodShare, Wisconsin Medicaid, and BadgerCare Plus programs in CY 2021, excluding Milwaukee Enrollment Services (MilES). MilES will follow existing FPIP guidelines.

The Department will allocate an amount based on each agency's percentage of the statewide IM caseload for 2020. Local agency contributions are encouraged and are still eligible for federal matching funds.

FPIP EXPECTATIONS

The FPIP Consortium can be comprised of the same agencies that make up the IM Consortium.

Under this model, each Consortium must select one agency to assume the role of administrative agency for the FPIP Consortium. It does not have to be the same agency that leads the IM Consortium.

Each Consortium will determine what staff will conduct FPIP investigations. Consortia can utilize agency staff, contract staff, local law enforcement or whatever combination is most effective for each consortium.

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

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

Roles and Responsibilities under DHS FPIP Model		
DHS	Local Agencies	FPIP Staff
Contract with local agency.	Tracking referrals, claims, and investigations through DHS approved tracking system.	Complete thorough fact finding investigations.
Provide program policy and process guidance for agencies as well as fraud related trainings/guidance.	Submit FPIP referrals to investigative staff.	Enter FPIP data in DHS approved Investigative Tracking System.
Assist with the Intentional Program Violation process.	Calculate claims for over issuance of public assistance benefits.	Provide agency education on FEV and fraud referrals.
Deliver guidance/technical assistance on trafficking enforcement.	Timely reporting of action taken on case(s) investigated.	Administrative Disqualification Hearing process for FPIP cases.
Maintain statewide fraud hotline and refer cases warranting investigation to agencies. OIG will keep and work cases as requested per agency. This will be dependent upon criteria set forth by the Inspector General and/or the Governor's Office.	Administrative or criminal prosecution of intentional program violations.	Regular meetings/updates 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.	

All agencies must comply with the requirements of the FPIP Guidelines (see attachment).

- a. The FPIP must emphasize fraud prevention over fraud detection.
- b. The FPIP must be cost neutral such that total program costs do not exceed total program savings as measured by future savings, claims established and sanctions. FPIP areas should target a ratio of savings to costs at 5:1.
- c. FPIP investigations will be categorized as pre-certification (FEV) or post-certification (FRD).
- d. DHS will monitor FPIP performance relative to cost-benefit ratio.
- e. To ensure timely and accurate data, FPIP staff shall be responsible for entering all data related to fraud investigation activities in the Investigative Tracking System approved by DHS.

DOCUMENTS AND FUNDING

- In order to meet contract deadlines and have funding in place by January 1, 2021, agencies must submit all necessary documents to Tami Tolliver at DHS within 45 days after the release of the memo.
- Local agencies may contribute funding to the FPIP and the total local contribution will be eligible for the federal match for all allowable costs.

TRIBAL AGENCIES

Tribal agencies are required to submit all necessary documents to Tami Tolliver at DHS no later than November 20, 2020, whether they plan to participate in a consortium or not.

Independent agencies must still abide by FPIP guidelines.

CENTRAL OFFICE CONTACT

For questions or assistance regarding any of the information contained in this memo, please contact Tami Tolliver at (608) 266-0930 or by e-mail at Tami.Tolliver1@dhs.wisconsin.gov.

All materials should be e-mailed or mailed to:

Tami Tolliver, FPIP Manager
Wisconsin Department of Health Services
Office of the Inspector General
1 West Wilson Street, Room 1151
PO Box 309
Madison, WI 53701-0309

CENTRAL OFFICE CONTACT FOR PARIS - TRAFFICKING - SLEB

For questions or assistance regarding Public Assistance Reporting Information System (PARIS) contact DHSOIGPARIS@wisconsin.gov. For questions or assistance regarding FoodShare/Medicaid Card Trafficking, please contact DHSOIGTRAFFICKING@wisconsin.gov.

PARIS is a federal-state partnership that detects and deters improper payments nationwide. This includes but is not limited to matching recipients with more than one public assistance case open in more than one state via federal database. The PARIS staff currently investigate all PARIS matches, determines overpayments, and processes intentional program violations.

Trafficking Enforcement team conducts investigations of Trafficking and Misuse of Wisconsin FoodShare benefits; directly or indirectly buying or selling Electronic Benefit Transfer (EBT) cards for cash and/or ineligible food items.

State Law Enforcement Bureau (SLEB) Wisconsin OIG has entered into an agreement with the Federal Nutrition Service (FNS) to conduct SLEB investigations on approved FoodShare Vendors. These investigations will be coordinated by the OIG's Trafficking Enforcement team, but conducted by local law enforcement agencies that enter into a memorandum of understanding (MOU) with the OIG. For more

information on SLEB please contact the SLEB Coordinator at DHSOIGSLEB@dhs.wisconsin.gov .

AGENCY UNDUPLICATED CASELOAD COUNTS
(January 2020 – June 2020 data)

AGENCY PERCENTAGE OF STATEWIDE CASELOAD
(EXCLUDING MILWAUKEE)

RESULTING CY 2021 FPIP CONSORTIUM FUNDING

AGENCY	UNDUPLICATED CASELOAD**	PERCENT OF TOTAL	TOTAL FUNDING
ADAMS COUNTY	2,997	0.618%	\$ 12,367.00
ASHLAND COUNTY	2,549	0.526%	\$ 10,518.00
BARRON COUNTY	6,483	1.337%	\$ 26,749.00
BAYFIELD COUNTY	1,695	0.350%	\$ 6,995.00
BROWN COUNTY	26,577	5.483%	\$ 109,659.00
BUFFALO COUNTY	1,315	0.271%	\$ 5,425.00
BURNETT COUNTY	2,280	0.470%	\$ 9,406.00
CALUMET COUNTY	2,848	0.588%	\$ 11,753.00
CHIPPEWA COUNTY	7,007	1.446%	\$ 28,913.00
CLARK COUNTY	3,557	0.734%	\$ 14,675.00
COLUMBIA COUNTY	5,335	1.101%	\$ 22,014.00
CRAWFORD COUNTY	2,096	0.432%	\$ 8,646.00
DANE COUNTY	45,863	9.462%	\$ 189,237.00
DODGE COUNTY	8,222	1.696%	\$ 33,927.00
DOOR COUNTY	2,619	0.540%	\$ 10,804.00
DOUGLAS COUNTY	5,741	1.184%	\$ 23,690.00
DUNN COUNTY	4,890	1.009%	\$ 20,175.00
EAU CLAIRE COUNTY	11,883	2.451%	\$ 49,028.00
FLORENCE COUNTY	605	0.125%	\$ 2,498.00
FOND DU LAC COUNTY	9,647	1.990%	\$ 39,805.00
FOREST COUNTY	1,252	0.258%	\$ 5,166.00
GRANT COUNTY	5,064	1.045%	\$ 20,894.00
GREEN COUNTY	3,370	0.695%	\$ 13,906.00
GREEN LAKE COUNTY	1,965	0.405%	\$ 8,107.00
IOWA COUNTY	2,183	0.450%	\$ 9,007.00
IRON COUNTY	1,002	0.207%	\$ 4,132.00
JACKSON COUNTY	2,519	0.520%	\$ 10,394.00
JEFFERSON COUNTY	7,898	1.629%	\$ 32,588.00
JUNEAU COUNTY	3,809	0.786%	\$ 15,714.00
KENOSHA COUNTY	21,166	4.367%	\$ 87,333.00
KEWAUNEE COUNTY	1,725	0.356%	\$ 7,119.00
LA CROSSE COUNTY	12,388	2.556%	\$ 51,113.00
LAFAYETTE COUNTY	1,575	0.325%	\$ 6,498.00
LANGLADE COUNTY	3,090	0.637%	\$ 12,750.00
LINCOLN COUNTY	3,493	0.721%	\$ 14,414.00
MANITOWOC COUNTY	8,090	1.669%	\$ 33,380.00
MARATHON COUNTY	14,136	2.916%	\$ 58,325.00
MARINETTE COUNTY	5,403	1.115%	\$ 22,292.00
MARQUETTE COUNTY	1,929	0.398%	\$ 7,958.00
MONROE COUNTY	5,055	1.043%	\$ 20,858.00
OCONTO COUNTY	3,711	0.766%	\$ 15,310.00
ONEIDA COUNTY	4,496	0.928%	\$ 18,551.00

OUTAGAMIE COUNTY	14,705	3.034%	\$ 60,674.00
OZAUKEE COUNTY	4,758	0.982%	\$ 19,632.00
PEPIN COUNTY	735	0.152%	\$ 3,033.00
PIERCE COUNTY	3,024	0.624%	\$ 12,478.00
POLK COUNTY	5,127	1.058%	\$ 21,154.00
PORTAGE COUNTY	6,598	1.361%	\$ 27,222.00
PRICE COUNTY	2,104	0.434%	\$ 8,680.00
RACINE COUNTY	26,344	5.435%	\$ 108,699.00
RICHLAND COUNTY	2,345	0.484%	\$ 9,676.00
ROCK COUNTY	21,728	4.483%	\$ 89,653.00
RUSK COUNTY	2,359	0.487%	\$ 9,734.00
SAUK COUNTY	7,339	1.514%	\$ 30,281.00
SAWYER COUNTY	2,304	0.475%	\$ 9,507.00
SHAWANO COUNTY	4,466	0.921%	\$ 18,425.00
SHEBOYGAN COUNTY	11,449	2.362%	\$ 47,240.00
ST. CROIX COUNTY	5,895	1.216%	\$ 24,324.00
TAYLOR COUNTY	2,219	0.458%	\$ 9,156.00
TREMPEALEAU COUNTY	3,222	0.665%	\$ 13,295.00
VERNON COUNTY	3,112	0.642%	\$ 12,839.00
VILAS COUNTY	2,389	0.493%	\$ 9,857.00
WALWORTH COUNTY	10,504	2.167%	\$ 43,341.00
WASHBURN COUNTY	2,372	0.489%	\$ 9,789.00
WASHINGTON COUNTY	8,596	1.773%	\$ 35,468.00
WAUKESHA COUNTY	22,085	4.556%	\$ 91,126.00
WAUPACA COUNTY	5,640	1.164%	\$ 23,273.00
WAUSHARA COUNTY	2,703	0.558%	\$ 11,152.00
WINNEBAGO COUNTY	16,609	3.427%	\$ 68,532.00
WOOD COUNTY	9,661	1.993%	\$ 39,861.00
BAD RIVER TRIBE	357	0.074%	\$ 1,472.00
LAC COURTE OREILLES TRIBE	663	0.137%	\$ 2,736.00
LAC DU FLAMBEAU TRIBE	890	0.184%	\$ 3,672.00
MENOMINEE TRIBE	1,243	0.256%	\$ 5,128.00
ONEIDA NATION	987	0.204%	\$ 4,072.00
POTAWATOMI TRIBE	31	0.006%	\$ 128.00
RED CLIFF TRIBE	334	0.069%	\$ 1,376.00
SOKAOGON TRIBE	171	0.035%	\$ 708.00
STOCKBRIDGE-MUNSEE TRIBE	124	0.026%	\$ 512.00
Total Cases	484,712	100.00%	\$ 1,999,998.00

** Average Active Case count January 2020 - June 2020

DEPARTMENT OF HEALTH SERVICES
OFFICE OF THE INSPECTOR GENERAL

Fraud Prevention and Investigation Program (FPIP) Fraud Year 2021 Contact Information

The FPIP for this agency will be represented and administered by the following consortium:

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NOTE: Personal information you provide may be used for secondary purposes [Privacy Law, s. 15.04(1) (m), Wisconsin Statutes].

AGENCY CONTACT INFORMATION

1A. Fraud Contact Information for FPIP Consortium Manager:

Name	Title
Email	Direct Telephone
Address	

1B. This Agency's FPIP Supervisor:

Name	Title
Email	Direct Telephone
Address	