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State of Wisconsin
Governor Scott Walker

TO: **Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
Training Staff
Child Care Coordinators**

FROM: Junior Martin, Director
Bureau of Program Integrity
Division of Early Care and Education
Department of Children and Families

DECE/BPI OPERATIONS MEMO

No: 18-09

DATE: 04/09/2018

Child Care

SUBJECT: Bureau of Program Integrity Technical Assistance and Fraud Reporting Mailbox Procedures

CROSS REFERENCE: Section 4.2.4 and Section 4.3.1 Wisconsin Shares Child Care Subsidy Policy Manual

EFFECTIVE DATE: APRIL 9, 2018

PURPOSE: The purpose of this operations memo is to provide procedural guidance for utilizing Bureau of Program Integrity technical assistance and fraud mailboxes.

BACKGROUND: The Bureau of Program Integrity (BPI) has two mailboxes that local agencies may send referrals and/or requests for assistance:

1. <https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form>
2. DCFMBChildCareFraud@wisconsin.gov

POLICY:
Bureau of Program Integrity Technical Assistance (TA) Mailbox

BPI provides Technical Assistance (TA) to all Wisconsin agency staff that may have Wisconsin Shares program integrity procedural questions.

Examples of requests to submit to the TA mailbox include but are not limited to questions about:

- Front End Verification (FEV)
- How to conduct client investigations
- How to conduct provider investigations
- Investigation Support
- Overpayment calculations
- Retraction and Voluntary Repayment Agreement (VPA) requests

- Submissions for Intentional Program Violation (IPV) approvals ([Chapter 4.5](#))
- Program Integrity systems issues such as: Benefit Recovery Investigation Tracking System (BRITS), CSAW, Post Load Benefit Correction (PLBC), and Cares Worker Web (CWW) for IPVs.
- Agency Fraud Plans

Agencies may submit Technical Assistance requests to BPI by accessing <https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form>. This form is directly submitted to the BPI Technical Assistance Mailbox.

When completing the BPI Technical Assistance form include:

- All contact information
- Select a request/topic type from the drop down list.
- Compose the request in the text box
 - Include the name of any Bureau or individual that has also been contacted and/or individuals to be copied with the inquiry response
 - Always include case number(s) and/or the provider(s) and/or location number(s) with the request
 - Documents may be attached at the bottom of the form. Select browse and upload the document

Technical Assistance Form

Sender Name: <input type="text"/>
Email Address: <input type="text"/>
Phone Number: <input type="text"/>
Agency: <input type="text"/>
Request Type: <input type="text" value="Policy Clarification Request"/> <input type="button" value="v"/>
Question/Request <input type="text"/>
Attach a document <input type="text"/> <input type="button" value="Browse..."/>
<input type="button" value="Send"/>

You will receive an automated confirmation message after submitting the technical assistance request. A member of the BPI Technical Assistance Team will reach out to the sender within 5 business days.

Accessing the Request Page

To access from the DCF homepage (www.dcf.wisconsin.gov), click “Child Care” drop down and select the “Program Integrity” link.



This will lead to the “Program Integrity” page. Select the blue “Partners” tab on the top right navigation.



The page will open to the Agency Program Integrity Page. Select the Program Integrity Technical Assistance on the side navigation.



Bureau of Program Integrity Fraud Mailbox

The Bureau of Program Integrity (BPI) collects child care client and provider fraud referrals for the state of Wisconsin and dispersing the referrals to the appropriate locations. This is managed through the Fraud Mailbox (DCFMBCHILDCAREFRAUD@wisconsin.gov). The mailbox is primarily utilized by private citizens, child care providers, local agencies, state departments, and divisions to report activities that may be fraudulent.

Provider Investigation Referrals

Examples of child care provider fraud referrals to submit to the Child Care Fraud mailbox include, but are not limited to:

- Care provided at location where the child does not have an authorization

- Certified provider holding outside employment
- Children attending the center live with the provider
- Payments are being made to the provider for children not attending
- Two or more no access visits by Department of Children and Families and/or local agency staff
- Improper attendance record keeping
 - Missing or incomplete attendance records
 - Children in attendance are not on the attendance records or are missing time(s) on attendance sheets
 - Children not appearing on the attendance records for over 30 consecutive days
 - Children signed in on attendance records are not present
 - Prefilled arrival or departure times for children for future dates or times
 - Recording arrival and departure times based on an anticipated schedule (i.e. M – F 7:00am – 4:00pm)
 - Rounding of arrival and departure times
 - Suspicious record completion (i.e. attendance records appear to be completed in one sitting vs. as children arrive and depart)
- Improper Payment Practices
 - Provider has no payment agreement in place
 - Provider has no policy regarding payment practices
 - Provider is not following their established payment practices
 - Provider is making the payment on behalf of parent
- Compromised MyWICChildCare EBT Card or information
 - Report of a possible compromised card or card/client EBT information observed in provider's possession ([reference OM 17-12](#))
- Provider overcapacity message received in EBT CSAW ([reference OM 17-54](#))
- Suspicious expulsions and disenrollment of children
- Location temporary and permanent closures
 - Includes frequent closures for provider "vacations"
 - Includes frequent unexpected or unannounced closures
- Suspicious requests
 - Provider calls to determine the amount of funds on a parent's card
 - Provider calls to request assistance in resetting an EBT card PIN that is not their own
- Reports of cashing out cards or providing kickbacks to clients
- 40% Rule Violation
 - More than 40% of subsidy children are the children of provider employees
- YoungStar Concerns
 - Teachers on the Registry are not in attendance or are not providing care
 - Teacher that is listed as the lead teacher is not providing the majority of care
 - Director(s) do not have the required certificates or level of training for their position
 - Director(s) credentials do not match The Registry profile
 - Director and/or teacher does not have wages reported from the center
 - Director and/or teacher has wages reported from outside employment during the time they are registered as providing care on The Registry

Agencies are only required to submit their provider fraud referrals that cannot be worked through their own or consortium investigations. These referrals should be submitted through DCFMBCHILDCAREFRAUD@wisconsin.gov.

Note: When submitting a referral to the fraud mailbox, include referral reason, provider name and number, location, client name and number, date of incident, and contact information of complainant. If information is incomplete, please submit all information received from the complainant.

Client Investigation Referrals

Agencies are expected to investigate their own client referrals. Agencies are not required to submit client referrals to the Department. However, if the referral cannot be worked by the local agency, please submit the referral to DCFMBCHILDCAREFRAUD@wisconsin.gov. BPI will assist with the reassignment of referrals. Examples of child care client fraud referrals ([reference OM 17-14](#)) that may be entered in the Benefit Recovery Investigation Tracking System (BRITS) or submitted to the BPI Fraud Mailbox include, but are not limited to:

- Frequent provider changes (3 or more in a year)
- Employment and or/income cannot be confirmed through data exchange
- Employer has refused to complete an EVF-E, send an acceptable letter, or confirm the parent's employment and/or income through collateral contact
- Client shares the same address as their provider
- Client is the provider and fails to report self-employment
- Client in possession of EBT card that is not their own
- Client has given their card to an unauthorized person including the provider
- Suspicious requests
 - Client requests funds to be loaded back on to card post expungement
 - 3 or more hardship requests in 6 a year
- Client attempting to maximize authorized hours (i.e. suspiciously high travel times)
- Concerns regarding household composition or shared placement
- Residency concerns (such as the client lives in another state)
 - Frequent returned mail for a client: This may suggest the client does not live at the address they are reporting.
- Income concerns such as:
 - Unreported income (such as additional employment)
 - Under reported income (reporting less than actually making)
- Child care need, such as the child(ren) are not attending the center but are making payments
- Parent is not in their approved activity
- Suspicion of fraudulent documentation

CONTACTS:

For Wisconsin Shares Child Care Chapter 3 and 4 policy questions outside of Milwaukee County contact the Bureau of Regional Operations (BRO) Child Care Policy Help Desk at BROCCPolicyHelpDesk@wisconsin.gov.

For referrals regarding alleged client or provider child care fraud or other program integrity concerns, please submit a referral to the Child Care Fraud Mailbox at DCFMBCHILDCAREFRAUD@wisconsin.gov.

DCF/DECE/BPI/MRF