DEPARTMENT OF HEALTH SERVICES
DIVISION OF HEALTH CARE ACCESS AND ACCOUNTABILITY
ADMINISTRATOR'S MEMO SERIES

NOTICE: 16-07

DATE:

DISPOSAL DATE: Ongoing

RE: Fraud Prevention and Investigation Program Allocations and Guidelines for CY 2017

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

FROM: Michael Heifetz, Administrator
Division of Health Care Access and Accountability

Anthony Baize, Inspector General
Office of the Inspector General

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) 2017.

BACKGROUND

The FPIP model focuses on fraud prevention, using investigative staff dedicated to provide all investigation activities under a single funding source, utilizing local agency and/or private contracted investigators.

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

- Consistent entry of fraud prevention data
- Payment error reduction
- Increased revenue from benefit recovery retention
- Measurable cost savings

CY 2017 FRAUD PREVENTION AND INVESTIGATION PROGRAM

DHS has earmarked $1,000,000 (all funds) to support statewide fraud prevention activities in all agencies, excluding Milwaukee Enrollment Services (MilES), that administer Wisconsin FoodShare, Wisconsin Medicaid, and BadgerCare Plus programs in CY 2017. MilES will follow existing FPIP guidelines.

The Department will allocate an amount based on each agency's percentage of the statewide IM caseload; consistent with the data used for 2017 IM administrative allocations (IMAA). Local agency contributions are encouraged and are still eligible for federal matching funds.

Your 2017 FPIP Consortium must be comprised of the same agencies in your IM Consortium.

Under this model, one agency must assume the role of administrative agency for the FPIP Consortium. Each IM Consortium will have the option to choose the administrative agency for the FPIP. 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 will have the option to operate an FPIP independently. If a tribal agency chooses to operate independently, the agency will still receive an FPIP allocation.

The table below breaks down the responsibilities for the FPIP.

Roles and Responsibilities under DHS 2017 FPIP Model		
DHS	**Local Agencies**	**FPIP Staff**
Contract with local agency.	Front End Verification using an updated Error Prone Profile located in the Application Agreement.	Investigations.
Policy and process guidance for agencies as well as fraud related trainings/guidance.	FPIP referrals to investigator.	Enter FPIP data in BRITS.
Assist with Intentional Program Violation Process.	Claims establishment for overpayments.	Agency education on FEV and Fraud referrals.
Guidance/technical assistance on trafficking enforcement.	Timely report 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.

This model is based on the following assumptions:

1. DHS will allocate funding specified in Schedule A for each agency to the administrative agency identified for the FPIP Consortium

2. Local agencies may contribute additional funding to the FPIP and the total local contribution will be eligible for the federal match for all allowable costs.

3. Schedule A allocations are based upon unduplicated IM caseload data from January 2016 through June 2016.

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

   a. The FPIP emphasizes 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 a pre-certification (FEV) or post-certification (FRD).
   d. DHS will monitor FPIP performance relative to cost-benefit ratio, timeliness of completions and number of investigations completed.
   e. To ensure timely and accurate data, FPIP staff shall be responsible for entering all data related to fraud investigation activities in the Benefit Recovery Investigative Tracking System (BRITS).
   f. FPIP Consortia will submit an Error Prone Profile located in the application agreement.

YOUR CONSORTIUM

- In order to meet contract deadlines and have funding in place by January 1, 2017, agencies must submit all necessary documents (see Schedule B) to Wendy Metcalf at DHS no later than December 30, 2016.
- 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

- No later than December 30, 2016, Tribal agencies must inform DHS in writing, to the e-mail address listed below, if the agency does not intend to participate in a consortium.
- Tribal agencies are still required to submit all necessary documents (see Schedule B) to Wendy Metcalf at DHS no later than December 30, 2016. 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 Wendy Metcalf at (608) 266-9710 or by e-mail at wendy.metcalf@dhs.wi.gov.

All materials should be mailed to:

Wendy Metcalf, FPI Program Manager
Office of the Inspector General
Wisconsin Department of Health Services
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) or FoodShare/Medicaid Card Trafficking, please contact Robert Klingforth at (608) 267-2849 or by e-mail to Robert.Klingforth@dhs.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 Central Office PARIS staff currently investigates all PARIS matches; determine overpayments, and intentional program violations.

Trafficking Enforcement team conducts investigations of Trafficking andMisuse 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 **(608) 267-2846** or you can e-mail **DHSOIGSLEB@DHS.Wisconsin.gov**

SCHEDULE A

AGENCY UNDUPLICATED CASELOAD COUNTS
(January 2016 – June 2016 data)

AGENCY PERCENTAGE OF STATEWIDE CASELOAD
(EXCLUDING MILWAUKEE)

RESULTING CY 2017 FPIP CONSORTIUM FUNDING

Agency	UNDUPLICATED CASELOAD**	PERCENT OF TOTAL	TOTAL FUNDING
ADAMS COUNTY	3,135	0.647%	6,466.00
ASHLAND COUNTY	2,567	0.529%	5,294.00
BARRON COUNTY	6,442	1.329%	13,286.00
BAYFIELD COUNTY	1,733	0.357%	3,573.00
BROWN COUNTY	25,772	5.315%	53,152.00
BUFFALO COUNTY	1,293	0.267%	2,666.00
BURNETT COUNTY	2,227	0.459%	4,592.00
CALUMET COUNTY	2,833	0.584%	5,842.00
CHIPPEWA COUNTY	7,117	1.468%	14,678.00
CLARK COUNTY	3,608	0.744%	7,441.00
COLUMBIA COUNTY	5,590	1.153%	11,528.00
CRAWFORD COUNTY	2,076	0.428%	4,281.00
DANE COUNTY	43,675	9.008%	90,076.00
DODGE COUNTY	8,375	1.727%	17,273.00
DOOR COUNTY	2,777	0.573%	5,726.00
DOUGLAS COUNTY	5,884	1.213%	12,135.00
DUNN COUNTY	4,702	0.970%	9,696.00
EAU CLAIRE COUNTY	12,044	2.484%	24,840.00
FLORENCE COUNTY	632	0.130%	1,304.00
FOND DU LAC COUNTY	9,646	1.989%	19,893.00
FOREST COUNTY	1,245	0.257%	2,568.00
GRANT COUNTY	4,993	1.030%	10,298.00
GREEN COUNTY	3,590	0.740%	7,403.00
GREEN LAKE COUNTY	2,006	0.414%	4,137.00
IOWA COUNTY	2,281	0.470%	4,705.00
IRON COUNTY	980	0.202%	2,021.00
JACKSON COUNTY	2,414	0.498%	4,978.00
JEFFERSON COUNTY	8,122	1.675%	16,750.00
JUNEAU COUNTY	3,616	0.746%	7,457.00
KENOSHA COUNTY	21,617	4.458%	44,582.00
KEWAUNEE COUNTY	1,740	0.359%	3,588.00
LA CROSSE COUNTY	13,148	2.712%	27,116.00
LAFAYETTE COUNTY	1,634	0.337%	3,369.00
LANGLADE COUNTY	3,051	0.629%	6,292.00
LINCOLN COUNTY	3,464	0.714%	7,144.00
MANITOWOC COUNTY	7,966	1.643%	16,429.00
MARATHON COUNTY	14,129	2.914%	29,140.00
MARINETTE COUNTY	5,704	1.176%	11,763.00
MARQUETTE COUNTY	1,943	0.401%	4,008.00
MONROE COUNTY	5,039	1.039%	10,392.00
OCONTO COUNTY	3,820	0.788%	7,878.00

ONEIDA COUNTY	4,751	0.980%	9,797.00
OUTAGAMIE COUNTY	14,803	3.053%	30,531.00
OZAUKEE COUNTY	4,650	0.959%	9,591.00
PEPIN COUNTY	763	0.157%	1,573.00
PIERCE COUNTY	3,084	0.636%	6,360.00
POLK COUNTY	4,939	1.019%	10,187.00
PORTAGE COUNTY	6,677	1.377%	13,771.00
PRICE COUNTY	2,076	0.428%	4,281.00
RACINE COUNTY	25,666	5.293%	52,933.00
RICHLAND COUNTY	2,391	0.493%	4,932.00
ROCK COUNTY	21,945	4.526%	45,260.00
RUSK COUNTY	2,296	0.473%	4,734.00
SAUK COUNTY	7,171	1.479%	14,789.00
SAWYER COUNTY	2,401	0.495%	4,953.00
SHAWANO COUNTY	4,479	0.924%	9,238.00
SHEBOYGAN COUNTY	11,522	2.376%	23,762.00
ST. CROIX COUNTY	5,715	1.179%	11,786.00
TAYLOR COUNTY	2,228	0.459%	4,594.00
TREMPEALEAU COUNTY	3,208	0.662%	6,616.00
VERNON COUNTY	3,279	0.676%	6,762.00
VILAS COUNTY	2,273	0.469%	4,687.00
WALWORTH COUNTY	10,804	2.228%	22,283.00
WASHBURN COUNTY	2,362	0.487%	4,871.00
WASHINGTON COUNTY	8,597	1.773%	17,731.00
WAUKESHA COUNTY	21,609	4.457%	44,566.00
WAUPACA COUNTY	5,944	1.226%	12,259.00
WAUSHARA COUNTY	2,793	0.576%	5,761.00
WINNEBAGO COUNTY	16,735	3.451%	34,514.00
WOOD COUNTY	10,043	2.071%	20,713.00
BAD RIVER TRIBE	465	0.096%	959.00
LAC COURTE OREILLES TRIBE	472	0.097%	974.00
LAC DU FLAMBEAU TRIBE	948	0.196%	1,956.00
MENOMINEE TRIBE	1,130	0.233%	2,331.00
ONEIDA TRIBAL COUNCIL	1,314	0.271%	2,709.00
POTAWATOMI TRIBE	39	0.008%	80.00
RED CLIFF TRIBE	344	0.071%	709.00
SOKAOGON TRIBE	203	0.042%	418.00
STOCKBRIDGE-MUNSEE TRIBE	131	0.027%	269.00
Total Cases	484,870	100.000%	1,000,000.00

** Average Active Case count Jan 16 - Jun 16

SCHEDULE B

FPIP APPLICATION/AGREEMENT WITH ATTACHMENTS:

Attachment 1 - Contracted investigator requirements.

Attachment 2 - Cooperative Agreement for all agencies participating in your consortium.

Attachment 3 - A chart of FPIP Positions, Funding, Roles and Reporting Structure Summary for each individual agency.

FRAUD PREVENTION and INVESTIGATION PROGRAM
2017 APPLICATION/AGREEMENT
Department of Health Services

INTRODUCTION

To support program integrity for Wisconsin FoodShare (FS), Wisconsin Medicaid, and BadgerCare Plus, DHS has established a Fraud Prevention and Investigation Program (FPIP). The FPIP is administered through contractual agreements between DHS and local agencies.

APPLICATION/AGREEMENT

To participate in the FPIP, consortium administrative agencies and independent agencies shall complete the FPIP Application/Agreement, including any required attachments. Upon approval by DHS, the participating agency agrees to comply with the operational and administrative requirements for the FPIP as established by DHS in the FPIP Guidelines.

The FPIP Application/Agreement shall consist of the budget proposal (Budget Worksheet) to fund the identified FTE percentage of FPIP staff for a calendar year and the designated agency staff responsible for the administration/supervision of the FPIP, and the following attachments:

1. A copy of all contracts that the agency has with FPIP-funded service providers (see attachment 1 for contracted investigator requirements).
2. A copy of the Cooperative Agreement from all participating agencies in the consortium (see attachment 2).
3. A chart of each agency's administrative structure, including all FPIP staff and/or contracted service providers (see attachment 3).
4. Copies of agency-developed forms and policy/process documents related to operation of your FPIP.

APPROVAL PROCESS

Submit the completed and signed FPIP Application/Agreement to:

Wendy Metcalf, FPI Program Manager
Room 1151, 1 West Wilson Street
Wisconsin Department of Health Services
P.O Box 309
Madison, WI 53701-0309
FAX: (608) 267-3380
Email: wendy.metcalf@dhs.wi.gov

Upon approval by DHS, a copy of the signed Application/Agreement will be sent to the administrative agency. DHS will amend agency State/County/Tribal contracts and revise the CARS fiscal reporting system as needed.

Fraud Prevention and Investigation Program (FPIP) Fraud Application/Agreement Year 2017

This Application/Agreement for _____ Consortium/Tribe or Independent Agency is for the operation of Calendar Year 2017 Fraud Prevention and Investigation Program (FPIP). The FPIP will be administered by the agency identified below:

Personal information you provide may be used for secondary purposes [Privacy Law, s. 15.04(1) (m), Wisconsin Statutes]. Attach any corresponding forms you refer to when answering the questions on this form.

1. AGENCY INFORMATION

County/Tribe/Independent Agency Name:

Are you an independent agency? Yes ☐ No ☐

If "No", name your FPIP Administrative Agency Lead:

1A. Fraud Contract Information for Agency:

Name	Title
Email	Direct Telephone
Address	

This Agency's 2017 FPIP will be Supervised by:

Name	Title
Email	Direct Telephone
Address	

If you're not the FPIP Lead in a consortium - skip to page 12 and complete page 12 through page 20.

1B. COLLECTIVE CONSORTIA/TRIBAL TOTALS:

Section 1B should be completed by the FPIP Administrative Agency Lead to show the collective totals for the consortia/tribes. Compile FPIP Position, Funding, Roles and Reporting Structure Summary for your Consortia as reported by the participating consortia counties in attachments 2 and 3 and document that information in the following tables.

FPIP Lead completes this page for the Consortium

Complete this table with the sums of the data provided in Attachment #3 from each agency in your consortium, including your own agency.

FEV	FRD	Gatekeeping	ADH/IPV	Overpayment Calculations	Desk Review/Audit	Contractor Management	Other FPIP Activity	Sum of FPIP Activity FTE's	The # of FPIP Activity FTE's funded with FPIP contract dollars	The # of FPIP Activity FTE's funded with Agency dollars	Activity FTEs funded with IM Base Allocation dollars

CONSORTIUM FPIP COSTS WORK SHEET	
SALARY	$
FRINGE BENEFITS	$
EQUIPMENT & SUPPLIES	$
TRAVEL	$
TRAINING	$
OTHER DIRECT COSTS	$
INDIRECT COSTS/AMSO	$
CONTRACTED COSTS	$
OTHER (Describe) _____	$
TOTAL COSTS	$ _____

2017 FPIP costs will be covered by the following funding sources:

CONSORTIUM FPIP FUNDING SOURCES WORK SHEET	
DHS ALLOCATION	$
OPTIONAL AGENCY CONTRIBUTION	$
50% FEDERAL MATCH TO ADDITIONAL AGENCY CONTRIBUTIONS	$
	$
	$
OTHER (Describe) _____	$
TOTAL FUNDING	$ _____

The following pages are completed for each individual agency

2. PROGRAM INTEGRITY RELATED TRAINING

The Department of Health Services, Office of the Inspector General provides a variety of IM Fraud related trainings. Please check any training your Consortium/Tribe or Independent Agency completed in 2016.

- ☐ A to Z's of Desk Investigations
- ☐ Conducting Trafficking/Misuse Investigation
- ☐ EBT Edge
- ☐ Fighting Fire with FIRE – Overview of OIG/FIRE Section
- ☐ FITS – Fraud Investigation Tracking System
- ☐ FoodShare Intentional Program Violation (IPV) and Administrative Disqualification Hearing (ADH) Process Start to Finish
- ☐ FoodShare Overpayment
- ☐ HERO – Helping Everyone Reduce Overpayments
- ☐ ID Theft Training
- ☐ Internet Search Tools for Investigations
- ☐ State Law Enforcement Bureau Investigations (SLEB)
- ☐ Other (List):

3. INTERNAL PROGRAM INTEGRITY EFFORTS

Best practice for handling internal fraud would be to refer the case to The Office of the Inspector General to avoid a conflict or appearance of a conflict of interest. The investigation can be referred to Wendy Metcalf 608-266-9710 or wendy.metcalf@dhs.wisconsin.gov.

4. ERROR PRONE PROFILES

Prevention of improper payments is crucial to reducing the number and size of overpayments; therefore successful Front End Verification (FEV) and data exchanges should be established. (See Chapter 12.3 of IM Manual: FEV Error-Prone Profile.) Please answer the questions following this section (4A) regarding your agency's FEV processes. The agency's error prone profile(s) should be evaluated annually to determine the current year's trend of errors.

4A. Local Agency's Error-Prone Profile (EPP) Completed by Each Individual Agency

Check the boxes below that apply to characteristics your agency uses as part of your EPP. The criteria should accommodate situations that are applicable to the specific agency. One method of creating the profile is to use QC reports on cases in which either member error or potential fraud was identified by workers. Another way would be a review of cases referred for fraud investigation. By examining actual fraud cases, it is possible to determine types of situations that result in error. It is also possible to discover from these cases a pattern of clues or signs of potential fraud. Second party review findings provide another source of information.

RESIDENCE:

- ☐ Conflicting documentation or verification differing from that reported by the applicant or the member.
- ☐ Recent arrival (within the prior three months) in the county (excluding migrant farm workers, the homeless, and residents of shelters).
- ☐ Highly mobile families who rarely stay in one location for more than two or three months (except for migrant farm workers).
- ☐ Member's EBT usage consistently occurs out of state.
- ☐ Other (List):

HOUSEHOLD COMPOSITION:

- ☐ Employable household members listed on the application, and then later reported to have moved.
- ☐ Collateral contact statement is inconsistent with the member's statement of household size.
- ☐ Landlord's address is same as member's address but landlord is not included as a household member.
- ☐ Landlord is the absent parent, male/female friend, or ex-spouse.

- ☐ Member reports someone else pays the rent for several months, but that person is not listed in the home.
- ☐ Household reports large increases or decreases in household size or a frequently fluctuating household size.
- ☐ Applicant or member reports little or no income, but does not want to have child support pursued or request other programs for which they would be eligible.
- ☐ An applicant or member reports a child residing in their household who is listed on another case in which no shared placement has been reported.
- ☐ Other (List):

ASSETS: (For Programs with Asset Tests)

- ☐ Member reports no assets or resources on the application, but has no unpaid bills.
- ☐ Member reports no vehicle but has no reasonable explanation of his/her transportation method (if s/he lives remote from public transportation).
- ☐ Information provided by the member shows a substantial reduction in assets just prior to application for assistance.
- ☐ Reported assets are very near or equal to the asset limits.
- ☐ Other (List):

EARNED INCOME:

- ☐ Reported income is different than IRS records or state tax forms.
- ☐ Member's expenses are being met, although member's reported income is not enough to satisfy the obligations.
- ☐ Self-employment income reported to have stopped (potential business assets available).
- ☐ Member reports zero income but states someone else paying the bills.
- ☐ Household that has a wage earner who becomes unemployed, and reports no UI, or reports UI has stopped but employment has not resumed.
- ☐ Household that has child(ren) age 16 or over who are not in school or employed.
- ☐ A FoodShare applicant reports zero income, does not request further assistance, such as W2, and is unable to clarify how needs are being met (possible unreported source of income).
- ☐ Employment information disagrees with wage query.
- ☐ Applicant or member reports dependent care expenses when no apparent need for child care exists.
- ☐ Other (List):

UNEARNED INCOME:

- ☐ Household with all members 65 or older that does not report SSA, SSI, VA, or other pensions may have income-producing assets.
- ☐ Household member claims disability, but does not report SSI, SSA, or worker's compensation.
- ☐ Applicant or member makes inconsistent statements about whether individuals providing financial assistance to them, provide this directly to a service provider or to the applicant/member.
- ☐ Other (List):

GENERAL CRITERIA:

- ☐ The member has provided contradictory information or made statements inconsistent with information provided by her/him during a previous contact, in the application form, or in a recent Six Month Review Form (SMRF) or review.
- ☐ Case was previously closed for loss of contact or failure to provide essential information.
- ☐ Case in which fraud was previously alleged or committed.
- ☐ Case in which information provided by applicant is incomplete or not clear.
- ☐ The case previously was referred for FEV which resulted in either denial or reduction of benefits.
- ☐ Cases where information is unclear and member is reluctant to bring in verification
- ☐ Other (List):

5. POST BRITS LAUNCH: Fraud Referral, Investigation and Post Investigation

Responsibilities and Expectations

Local agencies are responsible for tracking referrals, claims and investigations through BRITS. BRITS is the state wide accepted accounting tool where fraud reports are derived.

Check the boxes relating to tools that your Agency uses routinely to calculate member overpayments:

- ☐ Agency's internal Excel spreadsheet
- ☐ BV Sub-system
- ☐ Manual calculation
- ☐ Contractor – list below:
- ☐ CARES Simulation
- ☐ FS worksheet (F16030)
- ☐ Other – list below:

6. Required Attachments

Check the boxes below and attach any non-DHS approved forms your agency (or third party contractor) uses for FPIP Program Integrity efforts. Please only include copies of the following if they are specific to your agency or your third party contractor (e.g. a non-DHS form):

- ☐ Front End Monitoring Forms
- ☐ Citation
- ☐ Ordinance
- ☐ Copies of FPIP related MOUs
- ☐ Request for Income Verification
- ☐ Fraud Investigation Referral Forms
- ☐ Overpayment notifications
- ☐ Prosecution Diversion Agreement
- ☐ Prosecution Referral Forms
- ☐ Copies of Complete Contracts for FPIP Third Party Contracted Agencies
- ☐ Overpayment Spreadsheets
- ☐ Restitution or Overpayment Agreement
- ☐ ADH/IPV Referral Forms
- ☐ Other – list below:

Attached as part of this Application/Agreement are the following checked-off attachments:

- ☐ A copy of all contracts that the agency has with FPIP funded service providers (See Attachment 1 for contracted investigator requirements).
- ☐ A copy of the Cooperative Agreement(s) from all agencies participating in your consortium (See Attachment 2). This is not required for independent Tribal Agencies.
- ☐ A completed chart of FPIP Position, Funding, Roles and Reporting Structure Summary for Each Individual Agency (See Attachment 3)
- ☐ Copies of agency-developed forms and policy/process documents related to operation of your FPIP.

It is understood that the agency shall meet the operational and administrative requirements contained within the DHS FPIP Guidelines.

I certify that this agency shall comply with the terms and conditions in this Agreement/ Application.

_____ _____

Signature of Agency Director/Designee Date

_____

Title

For any questions regarding this application, contact the FPI Program Manager, Wendy Metcalf, at (608) 266-9710 or at wendy.metcalf@dhs.wi.gov

CONTRACTED INVESTIGATION SERVICES REQUIREMENTS

References:
WI Stat. 440.26
Administrative Code Chapter SPS 30, 31, 32, 33, 34 and 35

Commercial agencies which contract with counties or tribes to provide fraud prevention investigative services are subject to the Wisconsin Statute and Administrative Code requirements for private detectives. These requirements do not apply to off-duty law enforcement officers or public officers performing official duties, including law enforcement officers. Private individuals, including former law enforcement officers, must meet these requirements. See the current DES Administrator's Memo.

Counties or tribes deciding to contract with private agencies or individuals for investigative services need to obtain a copy of WI Statute 440.26 and Administrative Code Chapter SPS 30, and require that the individual meet the private detective requirements for licensure, training and liability.

2017 COOPERATIVE AGREEMENT
FRAUD PREVENTION and INVESTIGATION PROGRAM

This Agreement by and between the State of Wisconsin, Department of Health Services (DHS), through its agent _____ County/Tribal Department of Human/Social Services acting as the Fraud Prevention and Investigation Program District Administrative Agency and _____ _____ County/Tribal Agency, through its Department of Human/Social Services.

1. The purpose of this agreement is to:

   a. Meet the various requirements of Wis. Stats. Chapter 49 for maintaining, establishing and funding effective fraud prevention investigation activities in counties/tribes pursuant to the Fraud Prevention and Investigation Program (FPIP) IM/FPIP Consortium Application/Agreement covering the period January 1, 2017 through December 31, 2017.

   b. Serve as the basis for establishing the organizational and operational structures for providing FPIP services to counties/tribes in a geographical area, herein after referred to as IM/FPIP Consortium, pursuant to operational requirements, forms and reporting mechanisms as contained in the FPIP Guidelines developed by DHS and incorporated into this agreement by reference, hereto.

2. As an IM/FPIP Consortium participant, the County/Tribal Agency commits itself to the following:

   a. Cooperate with DHS and the IM/FPIP Consortium Administrative Agency in fulfilling the goals and objectives of the FPIP pursuant to FPIP Guidelines, federal laws and regulations, Wisconsin Statutes, applicable DHS rules and county/tribal ordinances.

   b. Cooperate with the IM/FPIP Consortium Administrative Agency in monitoring referrals, completed investigations and case actions taken as a result of fraud prevention activities.

   c. Cooperate with the IM/FPIP Consortium Administrative Agency and DHS in submission of narrative, financial and/or statistical reports either as required by FPIP Guidelines or as requested by DHS.

   d. Ensure that eligibility workers under its control make FPIP referrals to the investigator representing the IM/FPIP Consortium Administrative Agency, cooperate with case action reporting requirements and participate in FPIP related training.

   e. Make use of the administrative disqualification hearing process pursuant to Wisconsin Statutes and DHS Program Manuals when a completed fraud prevention investigation identifies an intentional program violation and no criminal action is pursued.

   f. Providing DHS OIG with copies of FPIP related third party contracts and/or Memoranda of Understanding MOUs.

   g. Coordinating internal investigations with DHS OIG to avoid conflicts of interest or the appearance of a conflict of interest.

3. The IM/FPIP Consortium Administrative Agency commits itself to the following tasks:

   a. Provide FPIP services and reports on FPIP activity to the County/Tribal Agency.

   b. Use qualified staff of investigators for providing FPIP services.

   c. Provide training to County/Tribal Agency eligibility workers on FPIP forms and procedures.

   d. Assist County/Tribal Agency in the identification and disqualification of individuals through the administrative disqualification hearing process when a completed fraud prevention investigation identifies an intentional program violation and no criminal action is pursued.

   e. Cooperate with prosecutors if County/Tribal Agency decides to refer a fraud prevention investigation case to the District Attorney for prosecution.

4. _____ is designated as the responsible County/Tribal Agency contact official for ensuring cooperation and coordination with the IM/FPIP Consortium Administrative Agency in fulfilling FPIP objectives.

5. Funding for FPIP services provided to the County/Tribal Agency will be assigned to the IM/FPIP Consortium Administrative Agency. If at an y time funds from either federal or state sources become unavailable or are reduced, FPIP services provided by the IM/FPIP Consortium Administrative Agency may also be terminated or reduced.

6. The files, records, documents and accounting procedures and practices relevant to the FPIP shall be subject to examination by DHS, the legislative auditors and auditors representing the federal funding agencies. A County/Tribal Agency shall not use, willingly allow, or cause to have such materials used for any purpose except for the administration of public assistance programs in conformance with state and federal laws and regulations.

The agency director or other duly authorized official executes this agreement intending to be bound hereby:

COUNTY/TRIBAL HUMAN SERVICES/ SOCIAL SERVICES AGENCY:	IM/FPIP CONSORTIUM ADMINISTRATIVE AGENCY:
BY:_____	BY:_____
TITLE:_____	TITLE:_____
DATE: _____	DATE: _____

FPIP Position, Funding, Roles and Reporting Structure Summary for Each Individual Agency:

- Only report FPIP Activity time on this table. Do not include time spent on non-FPIP activities. For example, if you have a full time person who spends half of their time performing FPIP activities report that person at 0.5 FTE.
- When computations are complex attach documentation of your calculations.
- **Fill out the chart below for your individual agency only.**
- **Submit this completed chart to your FPIP lead so they can complile the informaiton for each agency in your consortia.**

FEV	FRD	Gatekeeping	ADH/IPV	Overpayment Calculations	Desk Review/Audit	Contractor Management	Other FPIP Activity	Sum of FPIP Activity FTE's	The # of FPIP Activity FTE's funded with FPIP contract dollars	The # of FPIP Activity FTE's funded with Agency dollars	The # of FPIP Activity FTEs funded with IM Base Allocation dollars
Example row below				*Sum FTE's and record here →*				Sum from the left should match sum from the right	*←Sum FTE's and record here*		
1.0	*3.0*			*0.5*				***4.5***	*0.5*	*2.0*	*2.0*

FPIP Third Party Contracts, Partnerships and Roles

List below all additional parties that you utilize for performance of FPIP related activities

Third Party Contractors (non-law enforcement)

Third Party Contractor Name	Services (check boxes that apply)					Summed together equals 100%		
	Desk Investigations	Fieldwork	SWICAs	Overpayments	ADH/IPV	% of FPIP Agency dollars used to pay for these services	% of FPIP Contract dollars used to pay for these services	% of other dollars used to pay for these services.
ZYX Investigative Services (example)	X	X		X	X	20%	70%	10%

Other Partnerships

County/Tribe/ Independent Agency	Y/N	% of FPIP Contract Dollars used to pay for these services
Uses local Law Enforcement		
Fraud Hotline & Web Portal tips from the OIG		
Uses Diversion Agreements with local DA		
Refers cases for prosecution with local DA		
Has a municipal public assistance fraud ordinance		
Has issued citations based on municipal ordinance		

The 2017 FPIP will fund _____Investigator(s) or equivalent in contracted investigative services based on the following estimated expenditures:

FPIP COSTS WORK SHEET	
SALARY	$
FRINGE BENEFITS	$
EQUIPMENT & SUPPLIES	$
TRAVEL	$
TRAINING	$
OTHER DIRECT COSTS	$
INDIRECT COSTS/AMSO	$
CONTRACTED COSTS	$
OTHER (Describe) _____	$
TOTAL COSTS	$ _____

2017 FPIP costs will be covered by the following funding sources:

FPIP FUNDING SOURCES WORK SHEET	
DHS ALLOCATION	$
OPTIONAL AGENCY CONTRIBUTION	$
50% FEDERAL MATCH TO ADDITIONAL AGENCY CONTRIBUTIONS	$
	$
	$
OTHER (Describe) _____	$
TOTAL FUNDING	$ _____