

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

NOTICE: 18-04 (Amended)

DATE: September 12, 2019

DISPOSAL DATE: Ongoing

RE: Fraud Prevention and Investigation
Program Allocations and Guidelines for
CY 2019

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

FROM: Anna Benton, Deputy Director *AB*
Division of Medicaid Services
Anthony Baize, Inspector
General Office of the Inspector
General

PURPOSE

This memo amends Admin Memo 18-04 to reflect additional fraud funding amounts for (CY) 2019 in the amount of \$250,000 for a total of \$1,750,000, and to amend the funding charts to reflect the distribution of this additional funding. The memo also provides information regarding DHS Fraud Prevention and Investigation Program (FPIP) operation and funding for calendar year (CY) 2019.

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 2019 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. This memo provides the link – <https://dhs.wisconsin.gov/dhcaa/memos/admin/index.htm> - to the FPIP Guidelines that 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 realize:

- Consistent entry of fraud related data
- Payment error reduction

CY 2019 FRAUD PREVENTION AND INVESTIGATION PROGRAM

DHS has earmarked \$1,750,000 (all funds) to support statewide fraud prevention activities in all agencies that administer Wisconsin FoodShare, Wisconsin Medicaid, and BadgerCare Plus programs in CY 2019, excluding Milwaukee Enrollment Services (MILES). MILES will follow existing FPIP guidelines.

The Department has allocated an amount based on each agency's percentage of the statewide IM caseload for 2018. Local agency contributions are encouraged and are still eligible for federal matching funds.

FPIP EXPECTATIONS

The FPIP Consortium must 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 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.

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 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, 2019, agencies must submit all necessary documents to Wendy Metcalf at DHS no later than November 23rd, 2018.
- 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 Wendy Metcalf at DHS no later than November 23rd, 2018 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 Wendy Metcalf at (608) 266-9710 or by e-mail at Wendy.Metcalf@dhs.wisconsin.gov.

All materials should be mailed to:

Wendy Metcalf
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) or FoodShare/Medicaid Card Trafficking, Wendy Metcalf at 608-266-9710 or by e-mail at Wendy.Metcalf@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, 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 e-mail DHSOIGSLEB@DHS.Wisconsin.gov.

AGENCY UNDUPLICATED CASELOAD COUNTS (January 2018 – June 2018 data)

AGENCY PERCENTAGE OF STATEWIDE CASELOAD (EXCLUDING MILWAUKEE)

RESULTING CY 2019 FPIP CONSORTIUM FUNDING

Agency	UNDUPLICATED CASELOAD**	PERCENT OF TOTAL	TOTAL FUNDING	Additional Funding	New Total
ADAMS COUNTY	2631	0.549%	8,240	1,387	9,627
ASHLAND COUNTY	2545	0.531%	7,968	1,342	9,310
BARRON COUNTY	6383	1.332%	19,986	3,365	23,351
BAYFIELD COUNTY	1678	0.350%	5,255	885	6,140
BROWN COUNTY	25896	5.406%	81,093	13,652	94,745
BUFFALO COUNTY	1346	0.281%	4,213	709	4,922
BURNETT COUNTY	2193	0.458%	6,867	1,156	8,023
CALUMET COUNTY	2755	0.575%	8,626	1,452	10,078
CHIPPEWA COUNTY	6955	1.452%	21,778	3,666	25,444
CLARK COUNTY	3651	0.762%	11,434	1,925	13,359
COLUMBIA COUNTY	5361	1.119%	16,788	2,826	19,614
CRAWFORD COUNTY	2042	0.426%	6,393	1,076	7,469
DANE COUNTY	44453	9.280%	139,202	23,435	162,637
DODGE COUNTY	8166	1.705%	25,570	4,305	29,875
DOOR COUNTY	2645	0.552%	8,282	1,394	9,676
DOUGLAS COUNTY	5697	1.189%	17,838	3,003	20,841
DUNN COUNTY	4839	1.010%	15,151	2,551	17,702
EAU CLAIRE COUNTY	11984	2.502%	37,527	6,318	43,845
FLORENCE COUNTY	604	0.126%	1,892	319	2,211
FOND DU LAC COUNTY	9500	1.983%	29,749	5,008	34,757
FOREST COUNTY	1240	0.259%	3,882	654	4,536
GRANT COUNTY	5011	1.046%	15,690	2,641	18,331
GREEN COUNTY	3365	0.703%	10,538	1,774	12,312
GREEN LAKE COUNTY	1980	0.413%	6,201	1,044	7,245
IOWA COUNTY	2209	0.461%	6,917	1,164	8,081
IRON COUNTY	990	0.207%	3,099	522	3,621
JACKSON COUNTY	2470	0.516%	7,735	1,302	9,037

JEFFERSON COUNTY	7881	1.645%	24,679	4,155	28,834
JUNEAU COUNTY	3681	0.768%	11,526	1,940	13,466
KENOSHA COUNTY	20930	4.369%	65,539	11,034	76,573
KEWAUNEE COUNTY	1681	0.351%	5,264	886	6,150
LA CROSSE COUNTY	12504	2.610%	39,156	6,592	45,748
LAFAYETTE COUNTY	1571	0.328%	4,918	828	5,746
LANGLADE COUNTY	3093	0.646%	9,687	1,631	11,318
LINCOLN COUNTY	3461	0.722%	10,836	1,824	12,660
MANITOWOC COUNTY	7852	1.639%	24,589	4,140	28,729
MARATHON COUNTY	13945	2.911%	43,666	7,351	51,017
MARINETTE COUNTY	5547	1.158%	17,368	2,924	20,292
MARQUETTE COUNTY	1928	0.402%	6,036	1,016	7,052
MONROE COUNTY	4929	1.029%	15,434	2,598	18,032
OCONTO COUNTY	3637	0.759%	11,390	1,918	13,308
ONEIDA COUNTY	4553	0.950%	14,257	2,400	16,657
OUTAGAMIE COUNTY	14474	3.022%	45,324	7,630	52,954
OZAUKEE COUNTY	4678	0.977%	14,650	2,466	17,116
PEPIN COUNTY	749	0.156%	2,344	395	2,739
PIERCE COUNTY	3044	0.636%	9,533	1,605	11,138
POLK COUNTY	5093	1.063%	15,947	2,685	18,632
PORTAGE COUNTY	6662	1.391%	20,862	3,512	24,374
PRICE COUNTY	2088	0.436%	6,539	1,101	7,640
RACINE COUNTY	25841	5.395%	80,920	13,623	94,543
RICHLAND COUNTY	2318	0.484%	7,258	1,222	8,480
ROCK COUNTY	21499	4.488%	67,322	11,334	78,656
RUSK COUNTY	2304	0.481%	7,216	1,215	8,431
SAUK COUNTY	7258	1.515%	22,727	3,826	26,553
SAWYER COUNTY	2350	0.491%	7,358	1,239	8,597
SHAWANO COUNTY	4396	0.918%	13,766	2,317	16,083
SHEBOYGAN COUNTY	11181	2.334%	35,013	5,894	40,907
ST. CROIX COUNTY	5781	1.207%	18,104	3,048	21,152
TAYLOR COUNTY	2230	0.465%	6,982	1,175	8,157
TREMPEALEAU COUNTY	3196	0.667%	10,009	1,685	11,694
VERNON COUNTY	3152	0.658%	9,871	1,662	11,533
VILAS COUNTY	2301	0.480%	7,206	1,213	8,419
WALWORTH COUNTY	10406	2.172%	32,586	5,486	38,072
WASHBURN COUNTY	2372	0.495%	7,429	1,251	8,680
WASHINGTON COUNTY	8632	1.802%	27,030	4,551	31,581
WAUKESHA COUNTY	21881	4.568%	68,519	11,535	80,054
WAUPACA COUNTY	5751	1.201%	18,009	3,032	21,041
WAUSHARA COUNTY	2703	0.564%	8,465	1,425	9,890
WINNEBAGO COUNTY	16347	3.413%	51,191	8,618	59,809
WOOD COUNTY	9753	2.036%	30,540	5,142	35,682

BAD RIVER TRIBE	404	0.084%	1,264		1,264
LAC COURTE OREILLES TRIBE	563	0.118%	1,763		1,763
LAC DU FLAMBEAU TRIBE	904	0.189%	2,831		2,831
MENOMINEE TRIBE	1122	0.234%	3,512		3,512
ONEIDA NATION	1146	0.239%	3,589		3,589
POTAWATOMI TRIBE	41	0.008%	127		127
RED CLIFF TRIBE	331	0.069%	1,036		1,036
SOKAOGON TRIBE	172	0.036%	539		539
STOCKBRIDGE-MUNSEE TRIBE	114	0.024%	358		358
Total Cases	479,014	100.000%	1,499,998	249,999	1,749,997

** Average Active Case count Jan 18 - Jun 18



Fraud Prevention and Investigation Program (FPIP) Fraud Year 2019 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	