

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

NOTICE: 20-02

DATE: January 20, 2020

DISPOSAL DATE: Ongoing

RE: Fraud Prevention and Investigation  
Program Allocations and Guidelines for  
CY 2020

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

FROM: Jim Jones, Medicaid Deputy Administrator *JJ*  
Division of Medicaid Services  
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) 2020.

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 2020 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/18-04.pdf> 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 realize:

- Consistent entry of fraud related data
- Payment error reduction

## **CY 2020 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 2020, 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 2019. 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.

| <b>Roles and Responsibilities under DHS FPIP Model</b>                                                                                                                                                                                             |                                                                                      |                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| <b>DHS</b>                                                                                                                                                                                                                                         | <b>Local Agencies</b>                                                                | <b>FPIP Staff</b>                                               |
| 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.                              |

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, 2020, agencies must submit all necessary documents to Wendy Metcalf at DHS no later than November 22nd, 2019.
- 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 22nd, 2019 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) 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 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 DHSOIGSLEB@DHS.Wisconsin.gov.

AGENCY UNDUPLICATED CASELOAD COUNTS  
(January 2019 – June 2019 data)

AGENCY PERCENTAGE OF STATEWIDE CASELOAD  
(EXCLUDING MILWAUKEE)

RESULTING CY 2020 FPIP CONSORTIUM FUNDING

| Agency             | UNDUPLICATED CASELOAD** | PERCENT OF TOTAL | TOTAL FUNDING |
|--------------------|-------------------------|------------------|---------------|
| ADAMS COUNTY       | 2,982                   | 0.629%           | 12,578        |
| ASHLAND COUNTY     | 2,513                   | 0.530%           | 10,601        |
| BARRON COUNTY      | 6,371                   | 1.344%           | 26,875        |
| BAYFIELD COUNTY    | 1,657                   | 0.349%           | 6,989         |
| BROWN COUNTY       | 25,781                  | 5.438%           | 108,757       |
| BUFFALO COUNTY     | 1,302                   | 0.275%           | 5,493         |
| BURNETT COUNTY     | 2,234                   | 0.471%           | 9,424         |
| CALUMET COUNTY     | 2,772                   | 0.585%           | 11,695        |
| CHIPPEWA COUNTY    | 6,847                   | 1.444%           | 28,884        |
| CLARK COUNTY       | 3,569                   | 0.753%           | 15,055        |
| COLUMBIA COUNTY    | 5,309                   | 1.120%           | 22,396        |
| CRAWFORD COUNTY    | 2,058                   | 0.434%           | 8,680         |
| DANE COUNTY        | 43,937                  | 9.267%           | 185,348       |
| DODGE COUNTY       | 8,199                   | 1.729%           | 34,589        |
| DOOR COUNTY        | 2,565                   | 0.541%           | 10,820        |
| DOUGLAS COUNTY     | 5,572                   | 1.175%           | 23,505        |
| DUNN COUNTY        | 4,775                   | 1.007%           | 20,144        |
| EAU CLAIRE COUNTY  | 11,737                  | 2.476%           | 49,511        |
| FLORENCE COUNTY    | 615                     | 0.130%           | 2,594         |
| FOND DU LAC COUNTY | 9,458                   | 1.995%           | 39,898        |
| FOREST COUNTY      | 1,228                   | 0.259%           | 5,181         |
| GRANT COUNTY       | 5,003                   | 1.055%           | 21,107        |
| GREEN COUNTY       | 3,337                   | 0.704%           | 14,079        |
| GREEN LAKE COUNTY  | 1,969                   | 0.415%           | 8,306         |
| IOWA COUNTY        | 2,144                   | 0.452%           | 9,043         |
| IRON COUNTY        | 998                     | 0.210%           | 4,209         |
| JACKSON COUNTY     | 2,482                   | 0.524%           | 10,471        |
| JEFFERSON COUNTY   | 7,788                   | 1.643%           | 32,855        |
| JUNEAU COUNTY      | 3,619                   | 0.763%           | 15,266        |
| KENOSHA COUNTY     | 20,738                  | 4.374%           | 87,485        |
| KEWAUNEE COUNTY    | 1,703                   | 0.359%           | 7,184         |
| LA CROSSE COUNTY   | 12,471                  | 2.631%           | 52,610        |
| LAFAYETTE COUNTY   | 1,552                   | 0.327%           | 6,547         |
| LANGLADE COUNTY    | 3,073                   | 0.648%           | 12,964        |
| LINCOLN COUNTY     | 3,421                   | 0.722%           | 14,432        |
| MANITOWOC COUNTY   | 7,773                   | 1.639%           | 32,789        |
| MARATHON COUNTY    | 13,760                  | 2.902%           | 58,048        |
| MARINETTE COUNTY   | 5,382                   | 1.135%           | 22,703        |
| MARQUETTE COUNTY   | 1,885                   | 0.397%           | 7,950         |
| MONROE COUNTY      | 4,942                   | 1.042%           | 20,847        |
| OCONTO COUNTY      | 3,602                   | 0.760%           | 15,193        |

|                           |            |          |           |
|---------------------------|------------|----------|-----------|
| ONEIDA COUNTY             | 4,520      | 0.953%   | 19,069    |
| OUTAGAMIE COUNTY          | 14,373     | 3.032%   | 60,634    |
| OZAUKEE COUNTY            | 4,670      | 0.985%   | 19,700    |
| PEPIN COUNTY              | 740        | 0.156%   | 3,121     |
| PIERCE COUNTY             | 2,937      | 0.619%   | 12,388    |
| POLK COUNTY               | 5,054      | 1.066%   | 21,318    |
| PORTAGE COUNTY            | 6,536      | 1.379%   | 27,572    |
| PRICE COUNTY              | 2,068      | 0.436%   | 8,725     |
| RACINE COUNTY             | 25,671     | 5.415%   | 108,295   |
| RICHLAND COUNTY           | 2,308      | 0.487%   | 9,734     |
| ROCK COUNTY               | 21,121     | 4.455%   | 89,101    |
| RUSK COUNTY               | 2,322      | 0.490%   | 9,794     |
| SAUK COUNTY               | 7,164      | 1.511%   | 30,219    |
| SAWYER COUNTY             | 2,297      | 0.485%   | 9,691     |
| SHAWANO COUNTY            | 4,362      | 0.920%   | 18,401    |
| SHEBOYGAN COUNTY          | 11,016     | 2.324%   | 46,471    |
| ST. CROIX COUNTY          | 5,780      | 1.219%   | 24,382    |
| TAYLOR COUNTY             | 2,211      | 0.466%   | 9,326     |
| TREMPEALEAU COUNTY        | 3,197      | 0.674%   | 13,487    |
| VERNON COUNTY             | 3,090      | 0.652%   | 13,035    |
| VILAS COUNTY              | 2,312      | 0.488%   | 9,751     |
| WALWORTH COUNTY           | 10,202     | 2.152%   | 43,037    |
| WASHBURN COUNTY           | 2,374      | 0.501%   | 10,014    |
| WASHINGTON COUNTY         | 8,449      | 1.782%   | 35,642    |
| WAUKESHA COUNTY           | 21,605     | 4.557%   | 91,142    |
| WAUPACA COUNTY            | 5,697      | 1.202%   | 24,034    |
| WAUSHARA COUNTY           | 2,671      | 0.563%   | 11,269    |
| WINNEBAGO COUNTY          | 16,041     | 3.383%   | 67,670    |
| WOOD COUNTY               | 9,521      | 2.008%   | 40,166    |
| BAD RIVER TRIBE           | 386        | 0.081%   | 1,629     |
| LAC COURTE OREILLES TRIBE | 601        | 0.127%   | 2,535     |
| LAC DU FLAMBEAU TRIBE     | 874        | 0.184%   | 3,686     |
| MENOMINEE TRIBE           | 1,150      | 0.243%   | 4,851     |
| ONEIDA NATION             | 1,011      | 0.213%   | 4,264     |
| POTAWATOMI TRIBE          | 33         | 0.007%   | 139       |
| RED CLIFF TRIBE           | 322        | 0.068%   | 1,359     |
| SOKAOGON TRIBE            | 180        | 0.038%   | 759       |
| STOCKBRIDGE-MUNSEE TRIBE  | 115        | 0.024%   | 484       |
| Total                     | 474,098.17 | 100.000% | 1,999,999 |

\*\* Average Active Case count January 2019 - June 2019

## Fraud Prevention and Investigation Program (FPIP) Fraud Year 2020 Contact Information

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

|  |
|--|
|  |
|--|

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 |                  |