

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

NOTICE:

DATE:

DISPOSAL DATE: Ongoing

RE: Fraud Prevention and Investigation Program Allocations and Guidelines for Calendar Year 2024

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

DocuSigned by:

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PURPOSE

The purpose of this memo is to provide information regarding Department of Health Services' (DHS) Fraud Prevention and Investigation Program (FPIP) operation and funding for calendar year (CY) 2024.

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 Public Assistance Reporting Information System (PARIS), Trafficking/Misuse and State Law Enforcement Bureau Investigations (SLEB) inquiries.

The Consortium should designate their 2024 FPIP Consortium Manager using the FPIP Contact form attached to this memo.

FPIP contractual expectations are contained in the DHS – Consortium Income Maintenance (IM) 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 FPIP Consortium 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 investigative 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 IM agencies to maintain:

- Direct communication channels with program integrity staff at the state level
- Consistent entry of fraud related data
- Payment error reduction

CY 2024 FPIP

DHS has earmarked \$3000,000 (all funds) to support statewide fraud prevention activities in all agencies that administer Wisconsin FoodShare (FS), Wisconsin Medicaid (MA), and BadgerCare Plus (BC+) programs in CY 2024, excluding Milwaukee Enrollment Services (MilES). MilES will follow existing FPIP guidelines.

DHS will allocate an amount based on each agency's percentage of the statewide IM caseload for 2024. Local agency contributions are encouraged and are still eligible for federal matching funds.

FPIP EXPECTATIONS

The FPIP Consortium may 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 which staff will conduct FPIP investigations. Consortia may utilize agency staff, state staff, contract staff, local law enforcement or any combination that 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
Manage contract with local agency.	Track referrals, claims, and investigations through the DHS approved investigation tracking system (BRITS).	Complete thorough fact-finding investigations and refer suspected cases of fraud for administrative or criminal proceedings.
Provide program integrity policy and process guidance for agencies as well as fraud related trainings/guidance.	Establish error-prone profiles to prevent fraud. Submit fraud referrals to investigative staff.	Enter all investigative data in the DHS approved investigation tracking system (BRITS).
Assist with the Intentional Program Violation (IPV) process.	Calculate claims for trafficking, misuse and over issuance of public assistance benefits.	Provide agency education on Front End Verifications (FEV) and Fraud investigation processes.
Deliver guidance and technical assistance on trafficking enforcement policy and processes.	Ensure timely and thorough reporting of actions taken on cases investigated.	Support Administrative Disqualification Hearing (ADH) process for cases suspected of fraud.
Maintain statewide fraud hotline and refer cases to agencies as appropriate. The Office of Inspector General (OIG) will retain and work cases as requested per agency or upon criteria set forth by the Inspector General and/or the Governor's Office.	Support administrative or criminal prosecution of IPV.	Attend and participate in regular meetings and program and policy update discussions 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.	Perform and track all program integrity related activities as directed in the FPIP Guidelines.
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All agencies must comply with the requirements of the current FPIP Guidelines (see attachment). The Consortium is not responsible for the failure to meet any guidelines when the failure arises out of a cause that directly affects the Consortium's ability to meet its guidelines and that is beyond the reasonable control and without the fault or negligence of the Consortium.

- The FPIP must emphasize fraud prevention over fraud detection.
- 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.
- FPIP investigations will be categorized as pre-certification (FEV) or post-certification (FRD).
- DHS will monitor FPIP performance relative to cost-benefit ratio.
- 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 (BRITS).

DOCUMENTS AND FUNDING

- In order to meet contract deadlines and secure funding by January 1, 2024, agencies must submit all necessary documents to DHS via Tami Berg at the contact information below within 45 days after the release of this 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 DHS via Tami Berg at the contact information below within 45 days after the release of the memo.

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 Berg at (608) 266-0930 or by e-mail at Tami.Berg@wisconsin.gov.

All materials should be e-mailed to: Tami.Berg@wisconsin.gov. If email is not possible, materials may be mailed to:

Tami Berg, FPIP Manager
Wisconsin Department of Health Services
Office of the Inspector General
1 West Wilson Street, Room 950
PO Box 309
Madison, WI 53701-0309

CENTRAL OFFICE CONTACT FOR ITAU - PARIS - TRAFFICKING - SLEB

For questions or assistance regarding eligibility fraud investigations, please contact DHSOIGFIRE@wisconsin.gov.

For questions or assistance regarding PARIS, please contact DHSOIGPARIS@wisconsin.gov.

For questions or assistance regarding EBT Card Trafficking, please contact DHSOIGTRAFFICKING@wisconsin.gov.

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

ITAU conducts fraud investigations related to member eligibility of public assistance benefits. ITAU also addresses employee fraud within public assistance programs.

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 the federal database. The PARIS staff currently investigate all PARIS matches, determine overpayments, and process intentional program violations.

Trafficking conducts investigations of trafficking and misuse of WI FS benefits, such as directly or indirectly buying or selling Electronic Benefit Transfer (EBT) cards for cash and/or ineligible food items.

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

**AGENCY UNDUPLICATED CASELOAD COUNTS
(January 2023 – June 2023 data)**

**AGENCY PERCENTAGE OF STATEWIDE CASELOAD
(EXCLUDING MIIES)**

RESULTING CY 2024 FPIP CONSORTIUM FUNDING

AGENCY	UNDUPLICATED CASELOAD**	PERCENT OF TOTAL	TOTAL FUNDING
ADAMS COUNTY	4,021	0.6248%	\$ 18,745.00
ASHLAND COUNTY	3,193	0.4962%	\$ 14,886.00
BARRON COUNTY	8,255	1.2829%	\$ 38,486.00
BAYFIELD COUNTY	2,251	0.3498%	\$ 10,493.00
BROWN COUNTY	36,391	5.6551%	\$ 169,653.00
BUFFALO COUNTY	1,696	0.2636%	\$ 7,907.00
BURNETT COUNTY	2,971	0.4617%	\$ 13,850.00
CALUMET COUNTY	4,047	0.6290%	\$ 18,869.00
CHIPPEWA COUNTY	9,074	1.4100%	\$ 42,302.00
CLARK COUNTY	4,561	0.7087%	\$ 21,262.00
COLUMBIA COUNTY	6,958	1.0813%	\$ 32,438.00
CRAWFORD COUNTY	2,590	0.4025%	\$ 12,074.00
DANE COUNTY	63,896	9.9293%	\$ 297,878.00
DODGE COUNTY	11,024	1.7131%	\$ 51,392.00
DOOR COUNTY	3,435	0.5338%	\$ 16,015.00
DOUGLAS COUNTY	7,368	1.1450%	\$ 34,350.00
DUNN COUNTY	6,408	0.9957%	\$ 29,872.00
EAU CLAIRE COUNTY	15,904	2.4714%	\$ 74,142.00
FLORENCE COUNTY	730	0.1134%	\$ 3,401.00
FOND DU LAC COUNTY	13,050	2.0279%	\$ 60,838.00
FOREST COUNTY	1,642	0.2551%	\$ 7,653.00
GRANT COUNTY	6,409	0.9960%	\$ 29,879.00
GREEN COUNTY	4,262	0.6623%	\$ 19,870.00
GREEN LAKE COUNTY	2,691	0.4182%	\$ 12,547.00
IOWA COUNTY	2,649	0.4117%	\$ 12,351.00
IRON COUNTY	1,238	0.1923%	\$ 5,770.00
JACKSON COUNTY	3,510	0.5454%	\$ 16,363.00
JEFFERSON COUNTY	10,342	1.6072%	\$ 48,216.00
JUNEAU COUNTY	4,931	0.7662%	\$ 22,987.00
KENOSHA COUNTY	27,458	4.2669%	\$ 128,008.00
KEWAUNEE COUNTY	2,197	0.3414%	\$ 10,242.00
LA CROSSE COUNTY	16,366	2.5433%	\$ 76,298.00
LAFAYETTE COUNTY	2,012	0.3127%	\$ 9,380.00
LANGLADE COUNTY	3,926	0.6100%	\$ 18,301.00
LINCOLN COUNTY	4,480	0.6961%	\$ 20,883.00
MANITOWOC COUNTY	10,492	1.6305%	\$ 48,915.00
MARATHON COUNTY	19,198	2.9833%	\$ 89,501.00
MARINETTE COUNTY	7,142	1.1099%	\$ 33,297.00
MARQUETTE COUNTY	2,361	0.3668%	\$ 11,005.00
MONROE COUNTY	6,733	1.0462%	\$ 31,387.00
OCONTO COUNTY	4,855	0.7545%	\$ 22,635.00
ONEIDA COUNTY	5,740	0.8920%	\$ 26,760.00

OUTAGAMIE COUNTY	20,345	3.1615%	\$ 94,845.00
OZAUKEE COUNTY	6,576	1.0219%	\$ 30,656.00
PEPIN COUNTY	912	0.1417%	\$ 4,253.00
PIERCE COUNTY	4,125	0.6410%	\$ 19,230.00
POLK COUNTY	6,658	1.0347%	\$ 31,040.00
PORTAGE COUNTY	9,013	1.4006%	\$ 42,018.00
PRICE COUNTY	2,515	0.3909%	\$ 11,726.00
RACINE COUNTY	33,690	5.2353%	\$ 157,060.00
RICHLAND COUNTY	2,820	0.4382%	\$ 13,146.00
ROCK COUNTY	28,552	4.4370%	\$ 133,110.00
RUSK COUNTY	2,952	0.4587%	\$ 13,760.00
SAUK COUNTY	9,649	1.4994%	\$ 44,983.00
SAWYER COUNTY	2,863	0.4448%	\$ 13,345.00
SHAWANO COUNTY	5,906	0.9177%	\$ 27,532.00
SHEBOYGAN COUNTY	15,481	2.4057%	\$ 72,171.00
ST. CROIX COUNTY	8,212	1.2762%	\$ 38,286.00
TAYLOR COUNTY	2,797	0.4346%	\$ 13,037.00
TREMPEALEAU COUNTY	4,108	0.6384%	\$ 19,152.00
VERNON COUNTY	3,892	0.6049%	\$ 18,146.00
VILAS COUNTY	3,002	0.4665%	\$ 13,994.00
WALWORTH COUNTY	13,845	2.1515%	\$ 64,545.00
WASHBURN COUNTY	2,952	0.4587%	\$ 13,762.00
WASHINGTON COUNTY	11,646	1.8097%	\$ 54,292.00
WAUKESHA COUNTY	30,382	4.7213%	\$ 141,641.00
WAUPACA COUNTY	7,146	1.1105%	\$ 33,315.00
WAUSHARA COUNTY	3,648	0.5669%	\$ 17,008.00
WINNEBAGO COUNTY	22,588	3.5101%	\$ 105,302.00
WOOD COUNTY	12,759	1.9827%	\$ 59,480.00
BAD RIVER TRIBE	358	0.0556%	\$ 1,669.00
LAC COURTE OREILLES TRIBE	918	0.1427%	\$ 4,280.00
LAC DU FLAMBEAU TRIBE	1,080	0.1679%	\$ 5,035.00
MENOMINEE TRIBE (TRIBAL)	1,691	0.2628%	\$ 7,883.00
ONEIDA NATION	1,197	0.1860%	\$ 5,581.00
POTAWATOMI TRIBE	38	0.0059%	\$ 177.00
RED CLIFF TRIBE	377	0.0585%	\$ 1,756.00
SOKAOGON TRIBE	205	0.0319%	\$ 957.00
STOCKBRIDGE-MUNSEE TRIBE	156	0.0242%	\$ 726.00
Total Cases	643,505	100.00%	\$ 3,000,000.00

** Average Active Case count January 2023 - June 2023

DEPARTMENT OF HEALTH SERVICES
OFFICE OF THE INSPECTOR GENERAL

Fraud Prevention and Investigation Program (FPIP) Fraud Year 2024 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	