

**Enclosure B**

**CALAVERAS COUNTY RESPONSE COVER PAGE**  
MUST BE FULLY COMPLETED AND SUBMITTED WITH PLAN AND DATA

**CALAVERAS COUNTY is requesting participation in the Enhanced Anti-Fraud Program and will submit a Plan and Data as described above, by October 28, 2011.**

**Calaveras County Board of Supervisor Approval**

Approved on October 25, 2011, by the Calaveras County Board of Supervisors.

Name of Approver: Tom Tryon Title: Chair

Signature: 

**Board of Supervisors**

Name of Representative: Tom Tryon Title: Chair

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**County Welfare Department**

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**County District Attorney Office**

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## Enclosure C

# Calaveras County 2011 Fraud Investigation And Program Integrity For The IHSS Program Application Plan.

### **I IHSS Overpayments/Underpayments**

The CWHSA utilizes a Q A Monitoring Case Review Checklist document that is completed during the initial QA/QI case review. This document is utilized to not only capture data, but has been used to analyze case trends and any omissions or errors that would result in over or under assessing the correct amount of service hours for the consumer. The Q.A. Case Reviews will reduce the number of underpayments and overpayments before the case is authorized for IHSS services.

CWHSA Fraud Investigator conducts home visits to review IHSS renewal cases to ensure the eligibility of the IHSS recipient. Four to five home visits are conducted on a random sample of cases each month. During these home visits, the Fraud Investigator checks to ensure that Medi-Cal Share of Costs is being met. By performing Early Fraud activities, such as checking assets and income, will reduce and or stop the occurrence of overpayments before they start.

Enclosure D includes information on the past causes of overpayments/ underpayments cases to establish a baseline for the county for outcome comparisons.

### **II Fraud Referral/Outcomes**

All fraud referrals over \$500 are referred to the Calaveras County District Attorney's office. CWHSA's internal fraud completes a preliminary investigation prior to referral to the DA to determine if there is enough evidence to prosecute.

Enclosure D includes information on the past fraud cases in order to establish a baseline for the county for outcome comparisons.

### **III Collaboration and Partnerships with DA's Office**

The Calaveras County DA's office currently provides training for the CWHSA IHSS Social Workers at monthly Inter-Agency Disciplinary Team Meetings.

### **IV Collaboration and Partnerships with DHCS and CDSS**

The County currently collaborates with DHCS, doing joint referrals and investigations. There is a procedure in place to FAX any requests for information or for investigations to our County Investigator. Referrals to DHCS are currently being tracked and the County Fraud Investigator verifies that the referrals are completed and returned to the CWHSA office. Upon request from the County, CDSS provides ongoing fraud training and information.

### **V Mechanism for Tracking/Reporting**

The County will track and report their outcomes of their efforts to investigate IHSS fraud and to promote integrity of the IHSS program. The county will submit to CDSS their final data for SFY 11/12 by August 1, 2012 which shall be shared at a later date with other participating counties.

A new plan for Fraud Investigation and Program Integrity Efforts Related to the IHSS Program will be submitted each year on June 1<sup>st</sup>, which will include an updates to the previous year's plan, an agreement to continue tracking and reports fraud efforts and data.

Final data will be reported to the SDSS on the required forms by August 1<sup>st</sup> of each fiscal year.

The IHSS Fraud Investigator is responsible for tracking all overpayments. Overpayments/underpayments are reported to CDSS on the Fraud Investigation Activity Report DPA 266 each month as well as on the County IHSS Fraud Investigative data tracking tool. This data tracking tool is used for the tracking of referrals and outcomes data as well as the results of the IHSS Fraud Investigations and the amounts of the IHSS overpayments. For those clients who have overpayments and are still on the IHSS program, those overpayments are recouped via the CMIPS system.

## **VI County's Current and Proposed Anti-Fraud Activities**

Currently the CWHSA Fraud Investigator makes a visit to the IHSS recipient's homes to review their IHSS cases that are due for their annual reassessment for services to ensure the ongoing eligibility of the IHSS recipient, and that recipients are receiving the services from their IHSS provider(s). During these home visits, the Fraud Investigator performs Early Fraud activities, such as verifying assets and income.

WIC Section 12305.71(c)(3) requires that counties monitor the delivery of supportive services in the county to detect and prevent potential fraud by providers, recipients, and others, and to maximize the recovery of overpayments and remedy underpayments. Information which is obtained through mandated QA activities is utilized to detect and prevent fraud and abuse; and to insure consistent assessment standards from county to county.

The CWHSA's Fraud Investigator utilizes a fraud/inquiry referral form, which provides for a standardized process for making referrals to the County's Special Investigation Unit (SIU) regarding potential fraud and/or program irregularities

If IHSS staff suspects fraudulent activities regarding a recipient or provider of IHSS, a referral is submitted to the SIU. The referrals given to SIU contain as much specific information as possible, such as the following:

- Copies of all time sheets submitted for payment, including signatures;
- Copies of paid warrants;
- Documentation related to suspected fraud; and
- A completed Fraud Referral form.

The IHSS Supervisor reviews the monthly 300+ hours report, indicating IHSS providers who worked more than 300 hours in the previous month. The IHSS Supervisor investigates any individuals on this list who may be questionable by contacting the provider to submit a work schedule. The IHSS Supervisor may also contact the recipient and/or their authorized representative to confirm that the provider in question is providing adequate services. If fraudulent activity is suspected, a report is made to the Special Investigations Unit.

The county plans to utilize the CWHSA Fraud Investigator who currently is doing IHSS QA activities to investigate potential reports of IHSS Fraud from IHSS workers, the public, IHSS recipients and providers. Information and data obtained from the above activities will be analyzed for possible trends based on errors due to overpayments/ underpayments.

**VII County's Proposed Budget for Utilization of Funds**

<b>A. Personal Services- Salaries/Employee Benefits</b>	<b>Cost</b>
(1)CWHSA Fraud Investigator Devotes 35.2% of time to this Program	\$29,489.
<b>Project Total</b>	<b>\$29,489.</b>

**VIII Description of how the County will integrate Other program Integrity Efforts within the Plan.**

The county will use the IHSS QA/QI Plan to incorporate the processes that are currently in place. And with the enhanced efforts of Fraud Investigation and Program Integrity Efforts Plan pursuant to the California State Budget Act of 2009, the County's Fraud Investigator will provide enhanced fraud training to IHSS Social Workers. The County's Fraud Investigator will coordinate efforts towards the expanded provider enrollment requirement pursuant to ACIN I-69-09 with the County's IHSS Public Authority by attending IHSS provider orientations to present fraud training to IHSS providers, and to assist with IHSS provider/recipient fingerprinting and background checks requirements.

Within 60 days of the receipt of the Fraud Investigation and Program Integrity Efforts funding, the County will augment their proposed IHSS Fraud Investigation and Program Integrity Efforts as outlined in the County Plan.

**IX Annual Outcomes Report**

The County will submit an annual outcomes report to the State by August 1<sup>st</sup> of each year, the activities, data and outcomes associated with the county's efforts to mitigate, prevent, detect, investigate and prosecute IHSS fraud during the previous fiscal year in the format provided by CDSS.

## Enclosure E---Budget

Budget Section	Total
<b>A. Personnel Costs (includes employee benefits)</b>	<b>\$ 29,489.00</b>
<b>B. Operating Expenses</b>	<b>\$ 0</b>
<b>C. Equipment Expenses</b>	<b>\$ 0</b>
<b>D. Travel/Per Diem and Training</b>	<b>\$ 0</b>
<b>E. Subcontracts and Consultants</b>	<b>\$ 0</b>
<b>F. Other Costs</b>	<b>\$ 0</b>
<b>G. Indirect Expenses</b>	<b>\$ 0</b>
<b>Total Expenses</b>	<b>\$ 29,489.00</b>

### Budget Justification- CALAVERAS County's Fraud Funding Plan for FY 2011-12

<b>A. Personnel Costs (including employee benefits)</b>	<b>Total Budget</b>
<p><b>Title:</b> Welfare Fraud Investigator (35.2% of FTE)</p> <p><b>Salary Calculation:</b> 35.2% of Salary and Benefits= \$29,489.00</p> <p><b>Duties Description:</b> Works in the Calaveras Works and Human Services Agency (CWWSA) Fraud Unit. By a random sampling of IHSS cases, conducts home visits. Performs Early Fraud activities. Works with the D.A. and local law enforcement agencies to bring fraud suspects to justice. Receives fraud referrals from other agencies, including law enforcements agencies, as well as from the public. Provides court testimony on behalf of IHSS Fraud Unit. Conducts fraud training to CWWSA personnel. Devotes 35.2% of time to IHSS Fraud Plan implementation and investigation activities.</p>	<p>\$ 29,489.00</p>
<b>Total Personnel Costs:</b>	<b>\$ 29,489.00</b>

<b>B. Operating Expenses</b>	<b>Total Budget</b>
Title:	\$
Description:	
<b>Total Operating Expenses:</b>	<b>\$ 0</b>
<b>C. Equipment Expenses</b>	<b>Total Budget</b>
Title:	\$ 0
Description:	
<b>Total Equipment Expenses:</b>	<b>\$ 0</b>
<b>D. Travel/Per Diem and Training</b>	<b>Total Budget</b>
Title:	\$
Description:	
<b>Total Travel/Per Diem and Training:</b>	<b>\$ 0</b>
<b>E. Subcontracts and Consultants</b>	<b>Total Budget</b>
Title:	\$
Description:	
<b>Total Subcontracts and Consultants:</b>	<b>\$ 0</b>
<b>F. Other Costs</b>	<b>Total Budget</b>
Title:	\$
Description:	
<b>Total Other Costs:</b>	<b>\$ 0</b>
<b>G. Indirect Expenses</b>	<b>Total Budget</b>
Title:	\$
Description:	
<b>Total Indirect Costs:</b>	<b>\$ 0</b>