

10 Program Integrity and Accountability

Program integrity and accountability activities are integral to the effective administration of the CCDF program. As stewards of federal funds, Lead Agencies must ensure strong and effective internal controls to prevent fraud and maintain continuity of services to meet the needs of children and families. In order to operate and maintain a strong CCDF program, regular evaluation of the program's internal controls as well as comprehensive training for all entities involved in the administration of the program are imperative. In this section, Lead Agencies will describe their internal controls and how those internal controls effectively ensure integrity and accountability. These accountability measures should address reducing fraud, waste, and abuse, including program violations and administrative errors and should apply to all CCDF funds.

10.1 Effective Internal Controls

Lead Agencies must ensure the integrity of the use of CCDF funds through effective fiscal management and must ensure that financial practices are in place. Lead Agencies must have effective fiscal management practices in place for all CCDF expenditures.

10.1.1 Organizational structure to support integrity and internal controls

Describe how the Lead Agency's organizational structure ensures the oversight and implementation of effective internal controls that promote and support program integrity and accountability. Describe: *The Lead Agency's organizational structure is designed to ensure rigorous oversight and implementation of internal controls that bolster program integrity and accountability. The structure involves regular monthly meetings between the CCDF Co-administrator, the Director of Program Administration, and the fiscal team. In these meetings, they review case counts, cost trends, application guidelines, and spend-down reports, addressing any significant changes in caseloads or benefit amounts due to policy changes. On a daily basis, the Director of Program Administration oversees benefit issuance, which is prepared by the office manager. This manager verifies the accuracy of benefits reports by cross-referencing outputs from the integrated eligibility system and client information. Once the Director signs off on these reports, they are stored in SharePoint and then forwarded to the fiscal department for a final check before payment disbursement. This layered review process ensures meticulous verification and accountability at each step.*

Include the following elements in your description:

1. Assignment of authority and responsibilities related to program integrity.
2. Delegation of duties.
3. Coordination of activities.
4. Communication between fiscal and program staff.
5. Segregation of duties.
6. Establishment of checks and balances to identify potential fraud risks.
7. Other activities that support program integrity.

10.1.2 Fiscal management practices

Describe how the Lead Agency ensures effective fiscal management practices for all CCDF expenditures, including:

- a. Fiscal oversight of CCDF funds, including grants and contracts. Describe: *The Lead Agency maintains policies and procedures on subrecipient monitoring for all grant contracts. Grant contract monitoring activities include; a risk assessment of the subrecipient, completion of a Program Checklist, completion of a Contract Closure Assessment and periodic documentation review of the contract. Lead Agency program administrators review requests for reimbursement and supporting documentation to ensure that contracted vendors are expending funding in accordance with the requirements.*
- b. Tracking systems that ensure reasonable and allowable costs and allow for tracing of funds to a level of expenditure adequate to establish that such funds have not been used in violation of the provision of this part. Describe: *Lead Agency fiscal administration staff review requests for information to ensure that expenditures are reasonable and are allowable.*
- c. Processes and procedures to prepare and submit required state and federal fiscal reporting. Describe: *To prepare and submit the required state and federal fiscal reports, the processes involve a thorough and coordinated effort by the fiscal department. This department carefully reviews and compiles expenditure data from the fiscal management system, ensuring accuracy through cross-referencing with technical reports and system case counts. After assembling the reports, an additional layer of security and verification is provided by the Director of Program Administration, who reviews and signs off on them before submission. This systematic approach ensures compliance with regulatory standards and maintains the integrity of financial reporting.*
- d. Other. Describe: *Click or tap here to enter text.*

10.1.3 Effectiveness of fiscal management practices

Describe how the Lead Agency knows there are effective fiscal management practices in place for all CCDF expenditures, including:

- a. How the Lead Agency defines effective fiscal management practices. Describe: *Effective fiscal management practices involve regular monitoring, transparent accounting procedures, and adherence to federal and state guidelines to ensure proper allocation and use of CCDF funds. This includes detailed monthly meetings, rigorous expenditure tracking, and multiple controls for payouts, supported by advanced fiscal projection tools.*
- b. How the Lead Agency measures and tracks results of their fiscal management practices. Describe: *The Lead Agency measures the effectiveness of fiscal management through performance indicators such as expenditure rates, compliance with budget allocations, and audit results. Tools like expenditure tracking systems and monthly financial reporting are utilized to monitor these indicators closely.*

- c. How the results inform implementation. Describe: *The results from tracking and measuring fiscal management practices are used to refine budget planning, improve allocation strategies, and enhance oversight mechanisms. This continuous feedback loop ensures that fiscal practices directly support program objectives and compliance requirements.*
- d. Other. Describe: *Additionally, the Lead Agency employs technology-based solutions to automate financial reporting and uses predictive analytics to forecast future financial scenarios, improving decision-making and fiscal responsiveness.*

10.1.4 Identifying risk

Describe the processes the Lead Agency uses to identify risk in the CCDF program including:

- a. Each process used by the Lead Agency to identify risk (including entities responsible for implementing each process). Describe: *The Lead Agency sends all policy and procedure changes to other Lead Agency staff for review before implementation. This allows for questions and comments to be answered and reviewed before policy is finalized. Quality Control Unit staff notify the CCAP administrator and the policy and system support (PaSS) Training team of all errors or potential fraud found through case reviews, this includes but is not limited to improper payments. This allows for the training team to build and implement trainings based on actual case errors. The Child Care Assistance policy team reviews all intentional program violations (IPVs) for SNAP and TANF and determines if an IPV needs to be pursued for CCAP. Eligibility workers also go through a strict training an integrity protocol, after training on how to determine eligibility, cases worked by new workers in their first six months are reviewed by senior eligibility workers before approval or denial is determined. The Lead Agency closely monitors application rates, denials, approvals, and application churn to identify any barriers to the program from the application process. The Lead Agency also has access to a data dashboard which shows case payments and can assist in identifying ongoing case issues. The fiscal team for the Lead Agency meets monthly to monitor expenditures and review any unusual trends.*
- b. The frequency of each risk assessment. Describe: *Risk assessments are conducted with varying frequencies to ensure comprehensive oversight. Benefit issuance is cross-referenced daily to maintain accuracy. Overall expenditures are reviewed monthly in conjunction with fiscal and the CCAP team to track financial health. Additionally, the allocation of CCDF funds between early childhood programs and CCAP is thoroughly evaluated on a quarterly basis. These assessments include additional checks as needed if any discrepancies or inconsistencies are noted during regular reviews. This tiered approach ensures continuous monitoring and timely resolution of potential issues.*
- c. How the Lead Agency uses risk assessment results to inform program improvement. Describe: *The Lead Agency utilizes risk assessment results to inform program improvements by integrating financial projection tools that calculate changes in expenditures based on policy changes. By comparing actual outcomes with projected results, discrepancies are identified and addressed. Additionally, application counts and trends are continuously monitored via dashboards, enabling the agency to refine processes and address discrepancies in real-time. This systematic review helps in enhancing program accuracy and efficiency.*

- d. How the Lead Agency knows that the risk assessment processes utilized are effective. Describe: *The effectiveness of the risk assessment processes is confirmed through the alignment of financial projections with actual expenditures. When projections diverge from actual results, the agency conducts detailed analyses using dashboards that track applications, benefit issuance, and case progress. This capability to detect and investigate trends, including potential fraud, through correlation studies of overpayments and regional comparisons, demonstrates the robustness and reliability of the risk assessment processes.*
- e. Other. Describe: *The fiscal team creates comprehensive reports that are accessible to program administrators, CCDF administrators, and Directors of Early Childhood and Economic Assistance. These reports and the associated dashboards ensure transparency and facilitate ongoing monitoring, contributing to the overall integrity and improvement of the CCDF program.*

10.1.5 Processes to train about CCDF requirements and program integrity

Describe the processes the Lead Agency uses to train staff of the Lead Agency and other agencies engaged in the administration of CCDF, and child care providers about program requirements and integrity.

- a. Describe how the Lead Agency ensures that all staff who administer the CCDF program (including through MOUs, grants, and contracts) are informed and trained regarding program requirements and integrity.
 - i. Describe the training provided to staff members around CCDF program requirements and program integrity: *Policy changes are sent to the Human Service Zone's in the month prior to the changes becoming effective to give workers time to review and ask questions before the policy is implemented. Training guides are created and distributed statewide as areas of needed training are identified or when policies or procedures are changed. The Lead Agency utilizes the policy and system support (PaSS) unit to deliver periodic program and policy training. Additionally, the Lead Agency utilizes E-Learning courses that covers policies and case processing that are available statewide. New workers have all cases reviewed by a supervisor for six months during a probationary period to ensure understanding and correct procedures are consistently followed when determining eligibility.*
 - ii. Describe how staff training is evaluated for effectiveness: *The policy and system support (PaSS) unit monitors staff member trainings and takes feedback directly from participants.*
 - iii. Describe how the Lead Agency uses program integrity data (e.g., error rate results, risk assessment data) to inform ongoing staff training needs: *The Quality Control unit reviews CCAP cases monthly, which provides the PaSS unit with common errors to help create needed training.*
- b. Describe how the Lead Agency ensures all providers for children receiving CCDF funds are informed and trained regarding CCDF program requirements and program integrity:

- i. Describe the training for providers around CCDF program requirements and program integrity: *The Lead Agency requires that all providers receiving Child Care Assistance complete a CCAP Provider agreement before any funds can be issued. In addition, the Lead Agency has a "CCAP Provider Guidebook" and a "CCAP Billing Training" module available to all providers on the Lead Agency's website.*
- ii. Describe how provider training is evaluated for effectiveness: *The training is evaluated for effectiveness based on outcomes. A successful training is evidenced through provider feedback and a reduction in errors and questions about processes from our providers.*
- iii. Describe how the Lead Agency uses program integrity data (e.g., error rate results, risk assessment data) to inform ongoing provider training needs: *The Lead Agency uses red flag reports to inform on-going provider training needs. A monthly report is used to track providers who may have submitted for a payment in error through the provider self-service portal. Providers are contacted when they show up on this report and informed of correct billing procedures. A separate report is also used to track CCAP payments for providers over their licensed capacity. These are reviewed monthly and the Early Childhood licensing team is contacted as needed for additional training support for these providers.*

10.1.6 Evaluate internal control activities

Describe how the Lead Agency uses the following to regularly evaluate the effectiveness of Lead Agency internal control activities for all CCDF expenditures.

- a. Error rate review triennial report results (if applicable). Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: *The Lead Agency reviews reports with the fiscal team and the quality control team to identify concerns and areas for improvement then works in tandem with the Policy and System Support (PaSS) unit to create improvement plans centered on using data and reporting to identify better practices in procedure and workflow.*
- b. Audit results. Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: *Audit results are shared with all involved parties from the Lead Agency, if results are positive, programs and procedures continue as normal. If the Lead Agency receives an audit finding a meeting is coordinated with the relevant parties and a project is started to correct the procedure or policy that needs attention. A project manager is appointed who coordinates progress and provides updates.*
- c. Other. Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: *Click or tap here to enter text.*

10.1.7 Identified weaknesses in internal controls

Has the Lead Agency or other entity identified any weaknesses in its internal controls?

- a. No. If no, describe when and how it was most recently determined that there were no weaknesses in the Lead Agency’s internal controls. *The Lead Agency has worked to improve internal controls via data management and dashboards along with cross team collaboration. At this time there are no concerns with internal controls.*
- b. Yes. If yes, what were the indicators? How did you use the information to strengthen your internal controls? *Click or tap here to enter text.*

10.2 Fraud Investigation, Payment Recovery, and Sanctions

Lead Agencies must have the necessary controls to identify fraud and other program violations to ensure program integrity. Program violations can include both intentional and unintentional client and/or provider violations, as defined by the Lead Agency. These violations and errors, identified through the error-rate review process and other review processes, may result in payment or nonpayment (administrative) errors and may or may not be the result of fraud, based on the Lead Agency definition.

10.2.1 Strategies used to identify and prevent program violations

Check the activities the Lead Agency employs to ensure program integrity, and for each checked activity, identify what type of program violations the activity addresses, describe the activity and the results of these activities based on the most recent analysis.

- a. Share/match data from other programs (e.g., TANF program, Child and Adult Care Food Program, Food and Nutrition Service (FNS), Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, Public Assistance Reporting Information System (PARIS)).
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency may use information provided for other Economic Assistance Programs such as LIHEAP, SNAP, TANF and Health Care Coverage for the Child Care Assistance Program (CCAP). The Lead Agency’s integrated data system allows the option to search multiple interfaces and sources to be searched for household members at the same time. The sharing and matching of data with other programs and searching interfaces serves as a lead to eligibility workers to request additional information from income or other benefits sources that may not have been reported by the applicant. The results of this activity reduce the risk of incorrect eligibility.*
 - ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency may use information provided for other Economic Assistance Programs such as LIHEAP, SNAP, TANF and Health Care Coverage for the Child Care Assistance Program (CCAP). The Lead Agency’s integrated data system allows the option to search multiple interfaces and sources to be searched for household members at the same time. The sharing and matching of data with other programs and searching interfaces serves as a lead to eligibility workers to request additional information from income or other benefits sources that may not have been reported by the applicant. The results of this activity reduce the risk of incorrect eligibility.*

- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency may use information provided for other Economic Assistance Programs such as LIHEAP, SNAP, TANF and Health Care Coverage for the Child Care Assistance Program (CCAP). The Lead Agency’s integrated data system allows the option to search multiple interfaces and sources to be searched for household members at the same time. The sharing and matching of data with other programs and searching interfaces serves as a lead to eligibility workers to request additional information from income or other benefits sources that may not have been reported by the applicant. The results of this activity reduce the risk of incorrect eligibility.*
- b. Run system reports that flag errors (include types).
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency has red flag reports to help identify intentional program violations including the duplicate payment report, the CCAP payment over licensed number report, and the \$1 payment request report. The duplicate payment report identifies if multiple payments have been issued to a provider on behalf of the same child for a service month. The CCAP payment over licensed number report compares the total children paid for a service month to the total number of children a provider is licensed to care for. The \$1 payment request report monitors when a provider requests only a \$1 for payment for a month. The results of reviewing the duplicate payment report are to determine if the payments issued are correct or if has been issued in error, it is researched to determine how it occurred, how it could be prevented in the future, or if there were any fraudulent billings by the provider. The results of reviewing the CCAP payment over licensed number report are if a provider is discovered to be receiving more payments for children than they are licensed for, then additional research will be conducted to determine if there is fraud. The Lead Agency’s licensing staff will be involved as needed in these situations. The results of reviewing the \$1 payment request report are to determine if these requests have been submitted in error. Additional training may be needed for providers identified on any of these reports, in addition to potential overpayments.*

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency has red flag reports to help identify intentional program violations including the duplicate payment report, the CCAP payment over licensed number report, and the \$1 payment request report. The duplicate payment report identifies if multiple payments have been issued to a provider on behalf of the same child for a service month. The CCAP payment over licensed number report compares the total children paid for a service month to the total number of children a provider is licensed to care for. The \$1 payment request report monitors when a provider requests only a \$1 for payment for a month. The results of reviewing the duplicate payment report are to determine if the payments issued are correct or if has been issued in error, it is researched to determine how it occurred, how it could be prevented in the future, or if there were any fraudulent billings by the provider. The results of reviewing the CCAP payment over licensed number report are if a provider is discovered to be receiving more payments for children than they are licensed for, then additional research will be conducted to determine if there is fraud. The Lead Agency’s licensing staff will be involved as needed in these situations. The results of reviewing the \$1 payment request report are to determine if these requests have been submitted in error. Additional training may be needed for providers identified on any of these reports, in addition to potential overpayments.*
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency has red flag reports to help identify intentional program violations including the duplicate payment report, the CCAP payment over licensed number report, and the \$1 payment request report. The duplicate payment report identifies if multiple payments have been issued to a provider on behalf of the same child for a service month. The CCAP payment over licensed number report compares the total children paid for a service month to the total number of children a provider is licensed to care for. The \$1 payment request report monitors when a provider requests only a \$1 for payment for a month. The results of reviewing the duplicate payment report are to determine if the payments issued are correct or if has been issued in error, it is researched to determine how it occurred, how it could be prevented in the future, or if there were any fraudulent billings by the provider. The results of reviewing the CCAP payment over licensed number report are if a provider is discovered to be receiving more payments for children than they are licensed for, then additional research will be conducted to determine if there is fraud. The Lead Agency’s licensing staff will be involved as needed in these situations. The results of reviewing the \$1 payment request report are to determine if these requests have been submitted in error. Additional training may be needed for providers identified on any of these reports, in addition to potential overpayments.*

- c. Review enrollment documents and attendance or billing records.

- i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency's payment system ensures that attendance records are submitted for every month a provider requests payment for. If an attendance record for a prior month has not been submitted and a provider has received payment, the system will not allow a future payment until an attendance record for the prior month has been uploaded. An attendance record report is also generated monthly to monitor that attendance records are being submitted for all provider who have requested a payment from CCAP. The results from the attendance record report are that providers are monitored to ensure attendance records are being submitted. A selection of provider attendance records is randomly reviewed for accuracy, and providers are contacted for corrections and clarifications as needed. The monitoring of attendance records help ensures child care providers are correctly completing attendance records and certifying for Child Care Assistance payments accurately.*
- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Lead Agency's payment system ensures that attendance records are submitted for every month a provider requests payment for. If an attendance record for a prior month has not been submitted and a provider has received payment, the system will not allow a future payment until an attendance record for the prior month has been uploaded. An attendance record report is also generated monthly to monitor that attendance records are being submitted for all provider who have requested a payment from CCAP. The results from the attendance record report are that providers are monitored to ensure attendance records are being submitted. A selection of provider attendance records is randomly reviewed for accuracy, and providers are contacted for corrections and clarifications as needed. The monitoring of attendance records help ensures child care providers are correctly completing attendance records and certifying for Child Care Assistance payments accurately.*
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: *Click or tap here to enter text.*
- d. Conduct supervisory staff reviews or quality assurance reviews.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Quality Control unit conducts case file reviews to ensure policies and procedures are being properly applied across a monthly statewide caseload sample. The results of this are that based on the findings from the Quality Assurance/Control unit, the Human Service Zone workers can pursue IPV's when appropriate.*

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *The Quality Control unit conducts case file reviews to ensure policies and procedures are being properly applied across a monthly statewide caseload sample. The results of this are that areas of training are identified based on commonly occurring errors*
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: *The Quality Control unit conducts case file reviews to ensure policies and procedures are being properly applied across a monthly statewide caseload sample. The results of this are that areas of training are identified based on commonly occurring errors.*
- e. Audit provider records.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *Click or tap here to enter text.*
 - ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *Click or tap here to enter text.*
 - iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: *Click or tap here to enter text.*
- f. Train staff on policy and/or audits.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *Training on policy and regular audits are employed to detect and deter intentional violations such as fraud or manipulation of program rules. The results of these activities include better identification of potential IPV's. These activities involve comprehensive reviews and scenario-based training that emphasizes ethical behavior and legal compliance.*
 - ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: *For unintentional violations, which often stem from misunderstandings or mistakes in following program rules, the Lead Agency conducts training sessions that focus on clarity and understanding of policies. The impact of these training sessions is assessed through feedback mechanisms and monitoring of error rates, leading to continuous improvements in training materials and processes.*

- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: [Training aimed at reducing agency errors includes detailed instruction on application processing and benefit calculation. Quality Control audits are conducted to identify any patterns of error within the agency’s operations. The results typically inform administrative changes and updates in training programs to enhance accuracy and reduce the occurrence of such errors. Additionally live working sessions are held on a monthly basis to allow workers to ask questions about tricky cases and provide feedback from a program perspective.](#)
- g. Other. Describe the activity(ies): [Click or tap here to enter text.](#)
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: [Click or tap here to enter text.](#)
 - ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: [Click or tap here to enter text.](#)
 - iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: [Click or tap here to enter text.](#)

10.2.2 Identification and recovery of misspent funds

Lead Agencies must identify and recover misspent funds that are a result of fraud, and they have the option to recover any misspent funds that are a result of unintentional program violations or agency errors.

- a. Identify which agency is responsible for pursuing fraud and overpayments (e.g., State Office of the Inspector General, State Attorney): [North Dakota Department of Health and Human Services, Economic Assistance Unit.](#)
- b. Check and describe all activities, including the results of such activity, that the Lead Agency uses to investigate and recover improper payments due to fraud. Consider in your response potential fraud committed by providers, clients, staff, vendors, and contractors. Include in the description how each activity assists in the investigation and recovery of improper payment due to fraud or intentional program violations. Activities can include, but are not limited to, the following:
 - i. Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: [Click or tap here to enter text.](#)
 - ii. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: [Click or tap here to enter text.](#)

- iii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: *When a case or provider is closed and recoupments are not possible, the Lead Agency will pursue entering into a repayment agreement with the client or provider. The repayment plan is set to an amount that the provider or household agrees to pay monthly. There is no minimum requirement needed for a payment plan to be set up. The result of this activity is that repayments are taking place when the system is unable to recoup from active payments.*
- iv. Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: *When a case is open and payments are being issued, recoupments will be taken from all future payments until the claim balance is \$0. When a provider claim exists, and the provider is receiving payments through CCAP, recoupments will be taken from all future payments until the claim balance is \$0. Recoupments are set at 10% unless the claim is established due to an IPV or Fraud, which are recouped at 20% of the payment amount. A household or provider can also choose to have a set amount taken out of their future payments, as long as it is greater than the 10% or 20% previously set up. The results of this are that overpayments are collected from all payments quickly.*
- v. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vi. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vii. Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- viii. Other. Describe the activities and the results of these activities: *If unable to collect or reach a payment agreement with the household or provider, collection agencies that are contracted through the Lead Agency will be used to recover improper payment. The results is that overpayments are able to be collected if unable to agree on a repayment plan or recoup from payments.*

c. Does the Lead Agency investigate and recover improper payments due to unintentional program violations?

- No.
- Yes.

If yes, check and describe below any activities that the Lead Agency will use to investigate and recover improper payments due to unintentional program violations. Include in the description how each activity assists in the investigation and recovery of

improper payments due to unintentional program violations. Include a description of the results of such activity.

- i. Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- ii. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- iii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: *When a case or provider is closed and recoupments are not possible, the Lead Agency will pursue entering into a repayment agreement with the client or provider. The repayment plan is set to an amount that the provider or household agrees to pay monthly. There is no minimum requirement needed for a payment plan to be set up. The result of this activity is that repayments are taking place when the system is unable to recoup from active payments.*
- iv. Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: *When a case is open and payments are being issued, recoupments will be taken from all future payments until the claim balance is \$0. When a provider claim exists, and the provider is receiving payments through CCAP, recoupments will be taken from all future payments until the claim balance is \$0. Recoupments are set at 10% unless the claim is established due to an IPV or Fraud, which are recouped at 20% of the payment amount. A household or provider can also choose to have a set amount taken out of their future payments, as long as it is greater than the 10% or 20% previously set up. The results of this are that overpayments are collected from all payments quickly.*
- v. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vi. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vii. Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*

- viii. Other. Describe the activities and the results of these activities: *If unable to collect or reach a payment agreement with the household or provider, collection agencies that are contracted through the Lead Agency will be used to recover improper payment. The results is that overpayments are able to be collected if unable to agree on a repayment plan or recoup from payments.*

d. Does the Lead Agency investigate and recover improper payments due to agency errors?

- No.
- Yes.

If yes, check and describe all activities that the Lead Agency will use to investigate and recover improper payments due to agency errors. Include in the description how each activity assists in the investigation and recovery of improper payments due to administrative errors. Include a description of the results of such activity.

- i. Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- ii. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- iii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- iv. Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- v. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vi. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- vii. Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- viii. Other. Describe the activities and the results of these activities: *Click or tap here to enter text.*

- e. What type of sanction will the Lead Agency place on clients and providers to help reduce improper payments due to intentional program violations or fraud? Check and describe all that apply:
- i. Disqualify the client. Describe this process, including a description of the appeal process for clients who are disqualified. Describe the activities and the results of these activities based on the most recent analysis: *The human service zone has the burden to establish an Intentional Program Violation (IPV) by clear and convincing evidence. Clear and convincing evidence means evidence that leads to a firm belief that the allegations are true. When there is evidence a possible IPV has been committed, it is suggested the human service zone review the case and all evidence with the supervisor or director. When reviewing the evidence for a possible IPV, the individual must be allowed an opportunity to respond to any unresolved questions. When there is sufficient evidence to substantiate an IPV, the human service zone must complete an SFN 1940 TANF/SNAP/CCAP Notice of Suspected Intentional Program Violation. After completing the SFN 1940, TANF/SNAP/CCAP Notice of Suspected Intentional Program Violation, the county must schedule a meeting with the individual to discuss the suspected Intentional Program Violation (IPV) within two weeks. During this meeting the individual may sign Waiver A of the SFN 1940 which allows the individual to admit to the facts and accept a disqualification period. The individual may also sign Waiver B of the SFN 1940 which allows the individual to accept the disqualification without admitting to the facts. If an individual sign either waiver option, an Administrative Disqualification Hearing (ADH) will not be held and a disqualification period will be imposed. The SFN 1940 and supporting documentation will be supplied to the Lead Agency's Legal Advisory Unit (LAU) and they will prepare a Findings and Order to disqualify the individual. Individuals may also request an administrative disqualification hearing if they do not agree with the IPV. A consolidated hearing will be held for all programs for which the IPV is being pursued. The Lead Agency's LAU will send a Request for an Administrative Law Judge and a copy of the SFN 1940 to the Office of Administrative Hearings (OAH) and a hearing will be scheduled with the individual. When the hearing is complete, OAH will send a Recommended Findings & Order. The LAU will send a copy to the program for review. If the program agrees, the Order will be sent to the Executive Director of the Department. If an individual is found guilty of an IPV, the following timeframes will be imposed: 12 months for the first offense. 24 months for the second offense. Permanently for the third offense. If there are overpayments as a result of the IPV, recoupments will be taken out of all future payments at 20% until the claim balance is \$0. If the Lead Agency is unable to recoup from payments, the individual will be contacted to set up a payment plan.*

- ii. Disqualify the provider. Describe this process, including a description of the appeal process for providers who are disqualified. Describe the activities and the results of these activities based on the most recent analysis: *The human service zone has the burden to establish an Intentional Program Violation (IPV) by clear and convincing evidence. Clear and convincing evidence means evidence that leads to a firm belief that the allegations are true. When there is evidence a possible IPV has been committed, it is suggested the human service zone review the case and all evidence with the supervisor or director. When reviewing the evidence for a possible IPV, the individual must be allowed an opportunity to respond to any unresolved questions. When there is sufficient evidence to substantiate an IPV, the human service zone must complete an SFN 1940 TANF/SNAP/CCAP Notice of Suspected Intentional Program Violation. After completing the SFN 1940, TANF/SNAP/CCAP Notice of Suspected Intentional Program Violation, the county must schedule a meeting with the individual to discuss the suspected Intentional Program Violation (IPV) within two weeks. During this meeting the individual may sign Waiver A of the SFN 1940 which allows the individual to admit to the facts and accept a disqualification period. The individual may also sign Waiver B of the SFN 1940 which allows the individual to accept the disqualification without admitting to the facts. If an individual sign either waiver option, an Administrative Disqualification Hearing (ADH) will not be held and a disqualification period will be imposed. The SFN 1940 and supporting documentation will be supplied to the Lead Agency's Legal Advisory Unit (LAU) and they will prepare a Findings and Order to disqualify the individual. Individuals may also request an administrative disqualification hearing if they do not agree with the IPV. A consolidated hearing will be held for all programs for which the IPV is being pursued. The Lead Agency's LAU will send a Request for an Administrative Law Judge and a copy of the SFN 1940 to the Office of Administrative Hearings (OAH) and a hearing will be scheduled with the individual. When the hearing is complete, OAH will send a Recommended Findings & Order. The LAU will send a copy to the program for review. If the program agrees, the Order will be sent to the Executive Director of the Department. If an individual is found guilty of an IPV, the following timeframes will be imposed: 12 months for the first offense. 24 months for the second offense. Permanently for the third offense. If there are overpayments as a result of the IPV, recoupments will be taken out of all future payments at 20% until the claim balance is \$0. If the Lead Agency is unable to recoup from payments, the individual will be contacted to set up a payment plan.*
- iii. Prosecute criminally. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*
- iv. Other. Describe the activities and the results of these activities based on the most recent analysis: *Click or tap here to enter text.*