



NATIONAL CENTER ON

Subsidy Innovation and Accountability



# NATIONAL PROGRAM INTEGRITY WEBINAR SERIES

WEBINAR 1: PROGRAM INTEGRITY OVERVIEW

APRIL 11, 2017

# WELCOME AND INTRODUCTIONS

- Ellen Wheatley, Deputy Director, Office of Child Care (OCC)
- Moniquin Huggins, Director, Oversight and Accountability (OCC)
- Minh Lê, Program Specialist (OCC)
- Shelly Dilks, Program Specialist (OCC)
- Leigh Ann Bryan, TA Lead, Subsidy Innovation and Accountability Center

# AGENDA

- Program Integrity Overview
- CCDF Reauthorization and § 98.68
- Strategies to Increase Program Integrity and Reduce Fraud
- Resources
- Future Webinars

# HHS OIG REPORT - 2016

The screenshot shows a web browser window displaying the HHS OIG report page. The browser's address bar shows the URL: <https://oig.hhs.gov/oei/reports/oei-03-16-00150.as>. The page features a dark blue header with the text "REPORT FRAUD" in a red box, navigation links (Home, FAQs, FOIA, Contact, HEAT, Download Reader), and social media icons. The main content area includes the OIG logo, the text "Office of Inspector General U.S. Department of Health & Human Services", and a search bar. A navigation menu below the header lists: About OIG, Reports & Publications, Fraud, Compliance, Exclusions, Newsroom, and Careers. The main content area has a breadcrumb trail: Home > Reports & Publications > Office of Evaluation and Inspections > Report. The report title is "More Effort is Needed to Protect the Integrity of the Child Care and Development Fund Block Grant Program". Under the heading "WHY WE DID THIS STUDY", the text describes the CCDF program and the findings of the study. An "Interactive Map" of the United States is shown, with states colored in shades of green and yellow. On the right side, there is a "I'm looking for" section with a dropdown menu and a "Related Content" section with links to "Complete Report" and "Media Materials". A "Share this Report" section includes a "Tweet" button.

# PROGRAM INTEGRITY IN CCDF

- Regulatory requirements support program integrity and financial accountability
- *... mechanisms necessary to ensure provider and program quality, to meet the developmental needs of children, support parents in employment or education, and maintain financial accountability.*
- Ensure program integrity efforts do not negatively impact families seeking or receiving services

# Polls:

Who's on the call with us today?

Where do you focus most of your program integrity efforts?



**WHO'S WITH US  
TODAY?**

# § 98.68 PROGRAM INTEGRITY

INCLUDING 2016-18 STATE PLAN DATA

## § 98.68 PROGRAM INTEGRITY

*a) Lead Agencies are required to describe in their Plan effective internal controls that are in place to ensure integrity and accountability, while maintaining continuity of services, in the CCDF program. These shall include:*

*(1) Processes to ensure sound fiscal management;*

*(2) Processes to identify areas of risk;*

*(3) Processes to train child care providers and staff of the Lead Agency and other agencies engaged in the administration of CCDF about program requirements and integrity; and*

*(4) Regular evaluation of internal control activities.*

## § 98.68 PROGRAM INTEGRITY

*(b) Lead Agencies are required to describe in their Plan the processes that are in place to:*

*(1) Identify fraud or other program violations, which may include, but are not limited to the following:*

*(i) Record matching and database linkages;*

*(ii) Review of attendance and billing records;*

*(iii) Quality control or quality assurance reviews; and*

*(iv) Staff training on monitoring and audit processes.*

*(2) Investigate and recover fraudulent payments and to impose sanctions on clients or providers in response to fraud.*

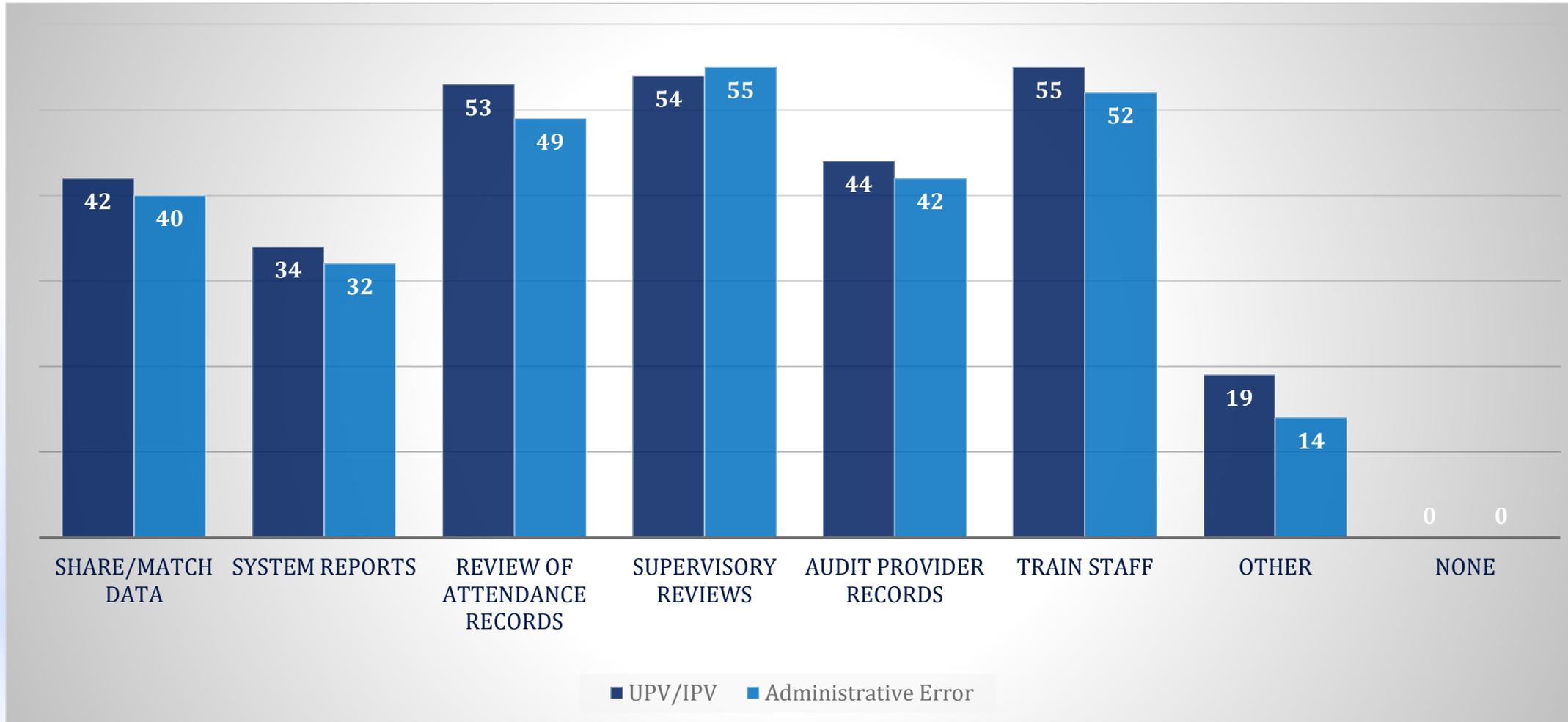
## § 98.68 PROGRAM INTEGRITY

*(c) Lead Agencies must describe in their Plan the procedures that are in place for documenting and verifying that children receiving assistance under this part meet eligibility criteria at the time of eligibility determination and re-determination. Because a child meeting eligibility requirements at the most recent eligibility determination or re-determination is considered eligible during the period between re-determinations as described in § 98.21(a)(1):*

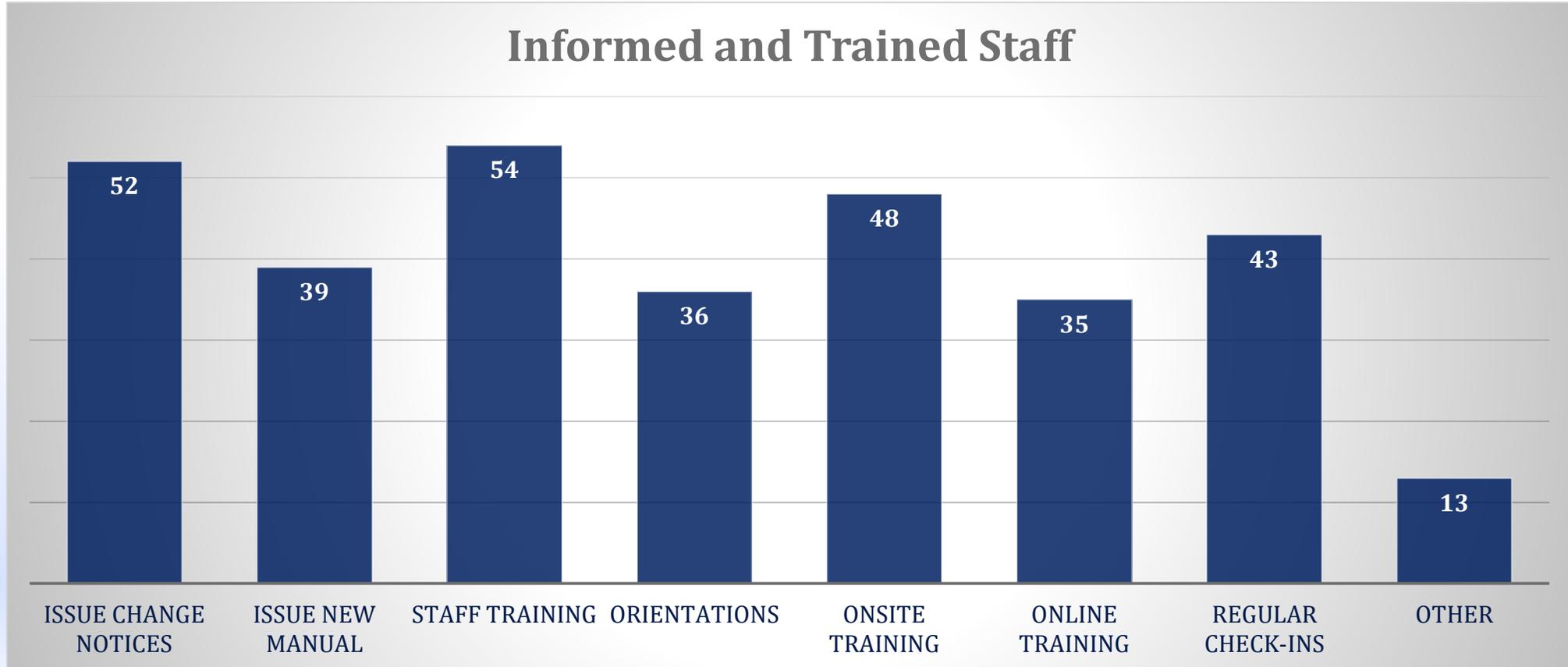
*(1) The Lead Agency shall pay any amount owed to a child care provider for services provided for such a child during this period under a payment agreement or authorization for services; and*

*(2) Any CCDF payment made for such a child during this period shall not be considered an error or improper payment under subpart K of this part due to a change in the family's circumstances, as set forth at § 98.21(a).*

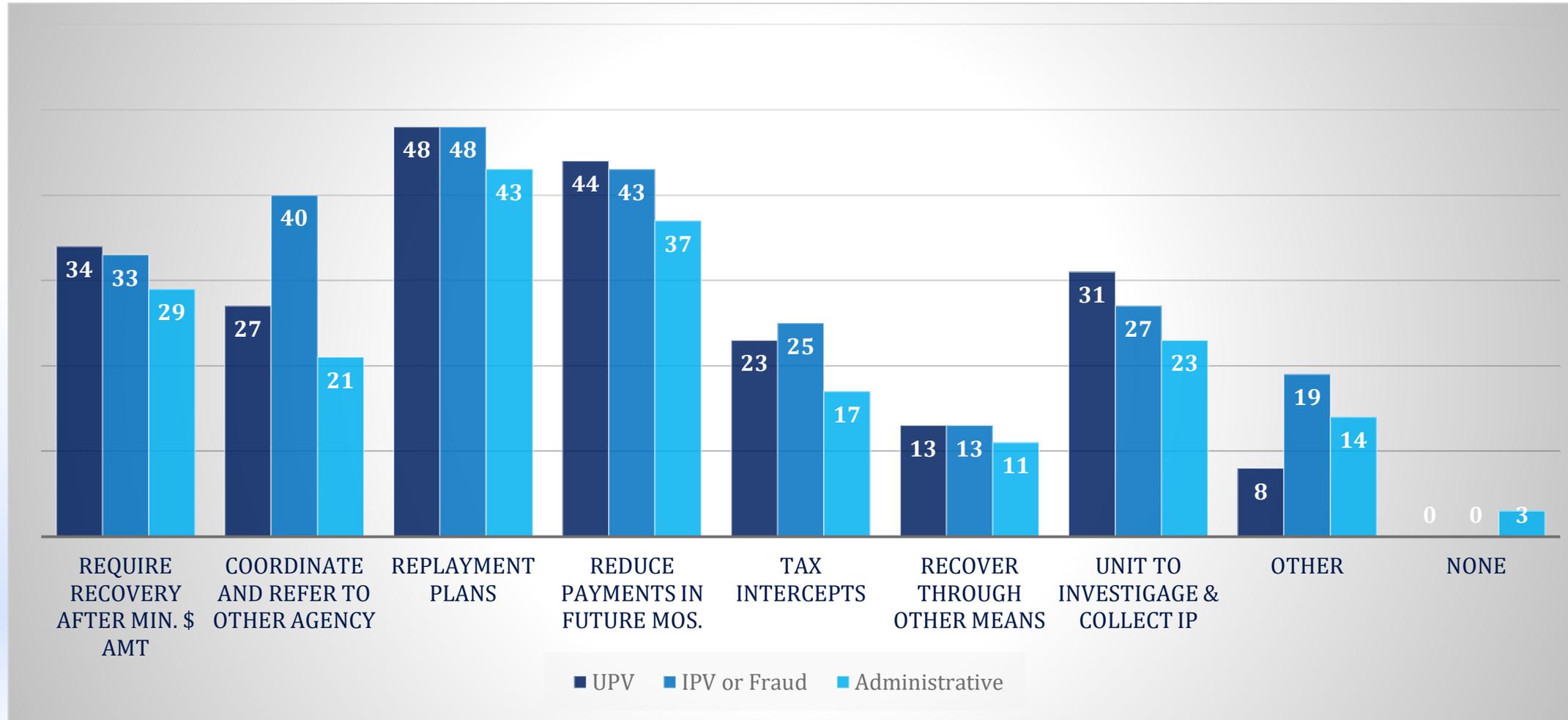
# ACTIVITIES TO IDENTIFY PROGRAM VIOLATIONS AND ADMINISTRATIVE ERROR (8.1.4a and 8.1.4b)



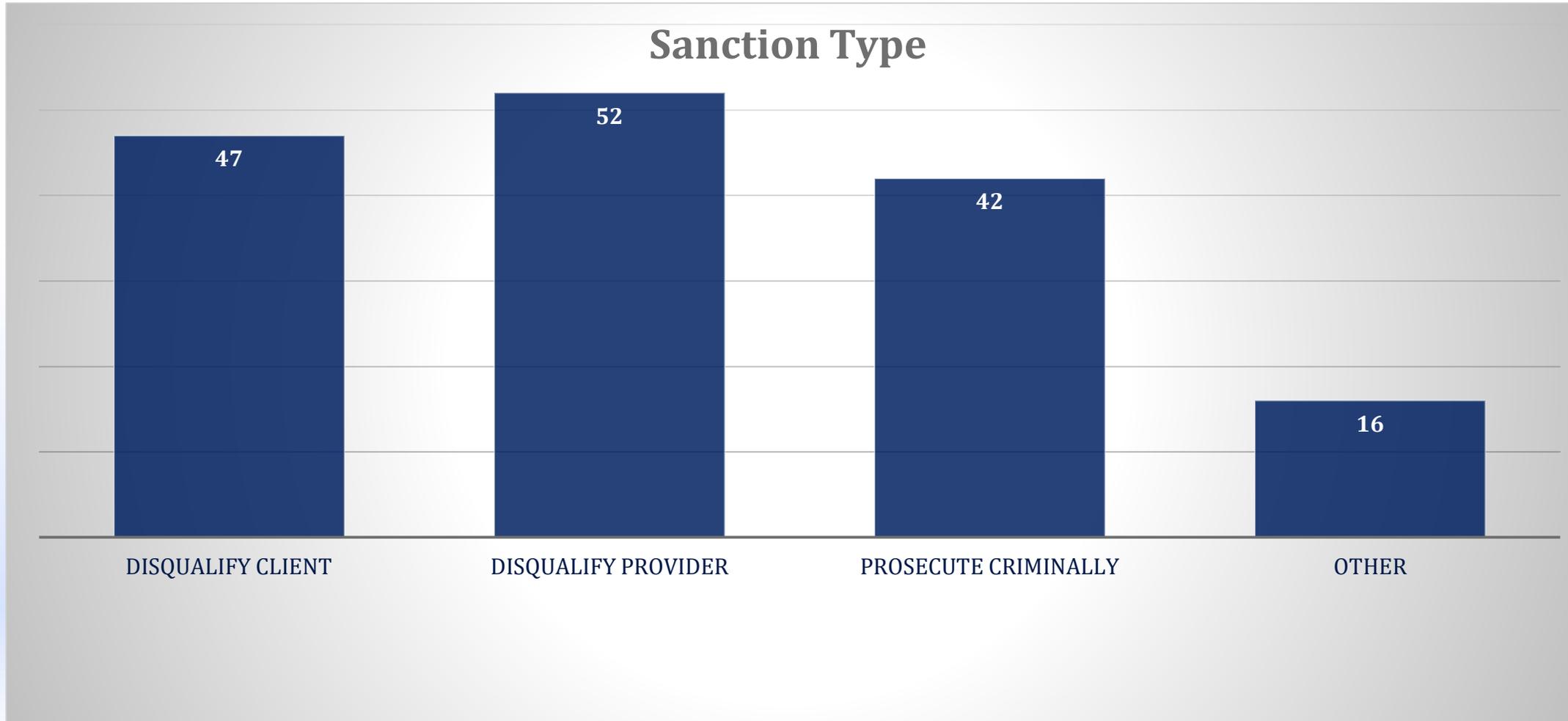
# ENSURES STAFF ARE INFORMED AND TRAINED ON POLICY CHANGES (8.1.2)



# ACTIVITIES TO INVESTIGATE AND COLLECT IMPROPER PAYMENTS (8.1.5a, 8.1.5b and 8.1.5c)



# SANCTION TYPE IMPOSED IN RESPONSE TO FRAUD (8.1.6)



# QUESTIONS?



# STRATEGIES TO INCREASE PROGRAM INTEGRITY

# STRATEGIES TO INCREASE PROGRAM INTEGRITY

- Administrative Oversight and Control
- Prevention Policies and Procedures
  - Family Eligibility
  - Provider and Payment
- Fraud Identification

# ADMINISTRATIVE OVERSIGHT & CONTROL

- Sub-recipient Monitoring
- Written Agreements
- Management Reports
- Supervisory Case Reviews
- Ongoing Case Reviews

# FAMILY ELIGIBILITY POLICY & PROCEDURES

- Clear and consistent policies and procedures
- Requirements for reported changes
- Considers impact of policy changes on access, continuity, and administrative efficiency
- Coordinate redeterminations with other assistance programs
- Verification resources
- System automation



# PROVIDER AND PAYMENT POLICIES AND PROCEDURES

- Ensure payment authorizations accurately reflect child's age, type of care, special needs, etc.
- Review of attendance or billing records
- Approved hours of care include allowances for travel time and considerations beyond work schedule
- Delinking reimbursement rates from the child's occasional absence
- Processes to ensure providers are operating legally
- Policies on out of state providers
- Establish communication protocols between Subsidy and Licensing staff

# STRATEGIES TO IDENTIFY AND PREVENT FRAUD

# FRAUD IDENTIFICATION AND PREVENTION

- System flags/reports
  - Capacity, perfect attendance, overrides, etc.
- Processes to routinely check providers are operating legally
  - Announced and unannounced visits, audit of records, communication between programs, fraud tip hotline
- Administrative errors
  - Audit trails, QC reviews, staff training



# FRAUD IDENTIFICATION AND PREVENTION, CONT.

- Processes and procedures to identify potential improper payment risks before payment is made
  - Linking databases, front-end detection, etc.
- Referring suspected family and provider overpayments for investigation
  - What is your process? Who is involved?
- Recoupment
  - Repayment plans, reduced payments, tax intercept, etc.



What new strategies are you using?

What strategies have been especially effective in your state/territory?



# RESOURCES

## PROGRAM INTEGRITY

# PROGRAM INTEGRITY RESOURCES

- **CCDF-ACF-PI-2010-06**

<https://www.acf.hhs.gov/occ/resource/pi-2010-06-0>

- **Past Program Integrity Conference Calls**

<https://www.acf.hhs.gov/occ/resource/program-integrity-conference-calls>

- **In the Works!**

- Fraud Tool Kit
- Updated Grantee Self-Assessment Instrument



What do you want to learn more about?

Would you like to showcase your state's program integrity work?

Contact Info:

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**NEXT CALL:**

**MAY 17**

**3:00 - 4:30 PM  
(EDT)**

**THANK YOU!**

