

Transition Communiqué #13-12 - CCIS Fraud Referrals and Overpayments Tracking Log

This is a message from the Bureau of Subsidized Child Care Services

Title: CCIS Fraud Referrals and Overpayments Tracking Log

Date: May 16, 2013

Priority: High

Category: Action Required

Action Required: See Next Steps

Response Required: See Next Steps

Purpose:

To provide Child Care Information Services (CCIS) agencies with a tracking log and procedures for transferring information regarding cases that have active fraud referrals or outstanding overpayments to CCIS Grantees for Fiscal Year 2013 – 2014 (FY 13-14).

Background:

CCIS agencies make referrals to the Office of Inspector General (OIG) when they suspect a parent/caretaker (p/c) and/or child care provider has committed fraud while receiving subsidized child care benefits, resulting in a child care overpayment, or when CCIS agencies are unable to collect an overpayment that is unrelated to fraud. Accurately tracking information for active OIG referrals and outstanding overpayment collections is vital for CCIS agencies in managing their caseloads and assisting with a smooth transition between current CCIS agencies and FY 13-14 CCIS agencies that will be covering new service areas. The tracking log will also help CCIS agencies that are remaining the same in FY 13–14 track cases with active OIG referrals or outstanding overpayments on an ongoing basis.

Discussion

Effective immediately, all existing CCIS agencies will be required to complete the attached Fraud Referrals/Overpayments Tracking Log and all FY 13-14 CCIS agencies must continue to maintain this tracking log on an ongoing basis. The tracking log is a spreadsheet containing four tabs. The first two tabs capture information on active OIG suspected fraud referrals for clients and/or providers and overpayments related to the suspected fraud:

- Active OIG Referrals – CLIENT
- Active OIG Referrals – PROVIDER

These two tabs include the following columns for tracking information:

- **CCIS Office**
- **Co/Record Number or Provider ID**
- **Parent/Caretaker or Provider Name**
- **OIG Referral Reason** – indicate the *OIG Referral Reason* by selecting a blank box in this column, clicking the down arrow displayed immediately to the right and, using the drop down list provided, select the appropriate reason for the referral to the OIG (“Fraud/Overpayment” or “Collection Only”).

- **Child Care Program (only on the CLIENT tab)** - indicate the *Child Care Program* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select the program under which care was received.
- **Date CCIS Referred to the OIG** – enter date referral was sent to the OIG.
- **Total Overpayment Amount** – enter the total overpayment amount.
- **Overpayment Period** – enter the begin and end dates of the overpayment period(s); if multiple periods exist, list the date ranges for each.
- **OIG Regional Office Assigned** – indicate the *OIG Regional Office Assigned* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select the OIG Regional Office handling the referral (one of four possibilities).
- **OIG Staff Contact Info** – enter the current OIG staff person assigned to the referral and his/her phone number/email address.
- **OIG Response Date** – indicate the date the OIG reported the results of its investigation to the CCIS.
- **OIG Investigation Status** – indicate the *OIG Investigation Status* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select the current status of the OIG investigation (Prosecution (Fraud), Collection Only (No Prosecution) or Pending).
- **Who is collecting the overpayment?** – indicate *who is collecting the overpayment* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select whether the OIG or CCIS is collecting on the overpayment.
- **Adjudication Date** – enter the *Adjudication Date* (found on the OIG 762 form) if established. If not known yet or inapplicable, leave blank.
- **Disqualification Date** – enter the *Disqualification Date*, if client has been disqualified from receiving subsidized child care. If the client has not been disqualified or the decision is pending, leave blank.
- **Status Update** – briefly explain the circumstances related to the OIG referral, including any important details as deemed necessary. If the overpayment was a result of client/provider collusion, include the provider ID information here as well.

The last two tabs capture information on client or provider overpayments currently in collection/recoupment status with the CCIS agency:

- CCIS OP Collection – CLIENT
- CCIS OP Collection – PROVIDER

These two tabs include the following columns for tracking information:

- The first three columns capture the same information as explained above for the two “Active OIG Referrals” tabs (i.e., **CCIS Office, Co/Record Number or Provider ID** and **Parent/Caretaker (P/C) or Provider Name**).
- **Date CCIS sent Overpayment Repayment Letter to the Parent/Caretaker or Provider** – enter date the overpayment repayment letter was sent to the p/c or provider.
- **Total Overpayment Amount** - enter the total overpayment amount.
- **Overpayment Period** - enter the begin and end dates of the overpayment period(s); if multiple periods exist, list the date ranges for each.

- **Child Care Program (only on the CLIENT tab)** - indicate the *Child Care Program* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select the program under which the overpayment exists.
- **Client or Provider Repayment Method** – indicate the *Client or Provider Repayment Method* by clicking the down arrow immediately to the right of a blank box in this column and, using the drop down list provided, select the overpayment repayment method for the client or provider.
 - Client repayment options are: CCIS Payment Plan (outside system), Co-pay Increase (in system) or Both Methods Combined
NOTE: Co-pay Increase is not a valid repayment method for the TANF and Food Stamps/SNAP child care programs.
 - Provider repayment options are: Recoupment Within System, Collection Outside System or Both Methods Combined
- **Date Repayment Began** – enter date the client or provider began repaying the overpayment.
- **Overpayment Balance Remaining for Collection** – enter the amount of remaining overpayment balance the client or provider is required to pay.
- **Status Update** - briefly explain the circumstances related to the active CCIS overpayment collection, including any important details as deemed necessary.

NOTE: The data in the spreadsheet may be filtered as desired by clicking on the down arrow in the lower right corner of any of the gray column headings. After clicking the down arrow in the column you want to filter by, a dialogue box will appear, allowing you to select the data element you want to use to limit the results displayed in that particular tab of the spreadsheet.

Next Steps:

1. All FY 12-13 CCIS grantees must send a copy of the completed Fraud Referrals/Overpayments Tracking Log to your Subsidy Coordinator no later than June 10, 2013.
2. As part of the transition process, all outgoing FY 12-13 CCIS grantees must share their completed Fraud Referrals/Overpayments Tracking Log with the new FY 13-14 CCIS agencies no later than June 17, 2013.
3. Effective immediately and on an ongoing basis, all FY 13-14 CCIS agencies will use the Fraud Referrals/Overpayments Tracking Log to track cases with active OIG referrals or outstanding overpayments, including any overpayments the CCIS is collecting.
4. Direct any questions to your Subsidy Coordinator.