

San Mateo County Program Integrity and Fraud Investigations Efforts

Proposed County Funding Allocation for San Mateo County: \$306,576

Introduction

San Mateo County submits the following plan to secure allocated funding for program integrity and fraud investigations efforts related to the In-Home Supportive Services (IHSS).

Guiding Principles:

- **Program Integrity:**

The purpose of IHSS is to keep people safe in their homes and to prevent institutionalization. If the services provided are compliant with the mandate, the assessments are qualitatively supported, the procedures are clear, and the health and safety of the consumer is in the forefront, then the services provided will prevent fraud successfully.
- **Protection:**

Abuse can be in many different forms: domestic violence, fraud, financial, medical neglect, emotional abuse and/or verbal abuse. Fraud may be difficult to identify and address especially if the consumer is in denial or protecting their family members. Social workers need to be able to identify “red flags” and to responsibly address and protect the consumer and the integrity of the program.
- **Collaboration:**

Working in partnerships with other County agencies and community partners that are experts in their field, the County is able to leverage the resources to achieve maximum efficiency and effectiveness. The San Mateo County Program Integrity and Fraud Investigations Plan includes collaboration with the District Attorney’s Office and the Human Services Agency. Sharing information, cross-training and joint visits will be the solution to more than IHSS program integrity. It will also allow greater program efficiency and effectiveness of other social services and public protection programs.
- **Continuous Quality Improvement (CQI):**

CQI procedures will be evidence-based and will build on proven best practices. The studies and tested practices in the field will guide the program’s effectiveness and will allow the County to customize according to our local needs. The reliance on evidence-based and best practices will improve quality and will allow the unit to focus on responding and adjusting to information from our immediate environment.

Current Program Integrity and Fraud Prevention

Current Program Integrity and Anti-Fraud Activities:

San Mateo County’s program integrity and anti-fraud activities center around the Quality Assurance and Continuous Quality Improvement Plans. Activities include:

1. Referrals to the Special Investigations Unit (SIU) for suspected fraud;

2. The Quality Assurance Specialist conducting follow-up home visits;
3. Referrals to the DHCS;
4. Random screening for fraud indicators; and
5. Data collection and reporting.

Proposed Program Integrity and Anti-Fraud Activities

1. **Program Integrity and Prevention Education (Provider and Recipient Trainings):**
San Mateo County will provide education for recipients on their rights, how to protect themselves against fraud/abuse, clear directions on how to report suspected abuse, and to whom they can talk if they need to discuss abuse from family members.
2. **Program Integrity and Prevention Education (Staff Trainings):**
The identification of red flags of fraud will be achieved by equipping the social workers with the skills and support needed to detect fraud. Skills/support will include:
 - Knowledge of how to identify common red flags;
 - Knowledge of common fraud schemes;
 - Training on managing conflict, intimidation and confrontation;
 - Access to the County's DA investigators; and
 - Clear procedures for reporting fraud.
3. **Collaboration (Service Delivery and Education):**
IHSS will partner with community agencies to inform and assess consumer needs. IHSS will subcontract with a community agency to provide assessments from an Occupational Therapist to substantiate the recipient's functional abilities on those cases that are suspected of fraud.
4. **Collaboration (Communication):**
IHSS will produce regular information on IHSS findings to relevant agencies such as the Administrative Law Judges, Legal Aid, and the IHSS Advisory Committee.
5. **Fraud Investigations (Consultation):**
The IHSS social workers will work closely with the County's Special Investigative Unit to request appropriate follow-up on cases suspected of fraud. The IHSS unit will arrange for case conferences with Investigators, the Deputy District Attorney and County Counsel.
6. **Fraud Investigations (Specialized Case Load):**
One social worker in IHSS will carry a specialized caseload associated with fraud cases and will maintain fraud prevention measures as program efficiencies and adherence to IHSS program regulations. This position will work closely with the Special Investigations Unit and with the Fair Hearing Office.

7. Continual Quality Improvement (Data collection and Analysis):
Data collection, analysis and reporting will be enhanced and will include trend analysis and reporting of findings to the appropriate agencies in addition to the Department of Health Care Services (DHCS).

IHSS Overpayments/Underpayments

San Mateo County's IHSS program will continue to identify and collect overpayments and underpayment on behalf of CDSS per the existing policies and procedures. The Quality Assurance (QA) Specialist has the responsibility to research, calculate and notify the provider of any overpayment and underpayment. All transactions are noted in the monthly QA report, reviewed by the IHSS Program Manager and appropriately forwarded to the state in accordance with All-County Letter No 09-32.

Enhancement: The reduction of overpayments will be achieved through the implementation of multiple activities. 1) The plan will provide education to providers and recipients about the approved use of IHSS reimbursements; 2) The QA Specialists will have access to SIU consultation regarding suspected abuse; and 3) The Program Integrity Office Specialist will monitor all suspected timecards and consult with the social workers and the QA Specialist when necessary. The impact of these activities will be monitored and tracked on a quarterly basis.

Enclosure D is attached.

Collaboration and Partnerships with the District Attorney's Office (DAO)

Currently, Aging and Adult Services works closely with the District Attorney's Office regarding the elder and dependent adult abuse cases.

Enhancements: The plan allows for an expanded working relationship regarding the elder and dependent adult abuse cases for our IHSS recipients. Through the DA's consultation the IHSS unit will be informed of how to appropriately document and collect information for those cases where fraud is suspected. The funding will provide opportunities for legal counsel when needed regarding prevention measures as well.

Additionally San Mateo County's Program Integrity and Fraud Prevention plan requests funding for County Counsel services. The inclusion of County Counsel will provide advice and consultation on procedures and protocols that seek to protect the recipients and maintain the integrity of the program. Topic areas will include: employer/provider issues, review of cases for fair hearings, confidentiality, and development of best practices.

Fraud Referrals/Outcomes

Current Practice: Currently San Mateo County forwards all cases of suspected fraud to the DHCS. The Investigator will work closely with the QA Specialist on any case DHCS will investigate. The IHSS Supervisor and QA Specialist will occasionally refer a case to the County's SIU. They will consult with the SIU Supervisor on the appropriateness of the case and either investigate or recommend forwarding the case to DHCS.

Enhancements: If funded, the plan will provide funding for a .1FTE SIU Supervisor to provide consultation, case review, training and investigations for the IHSS cases. The SIU Supervisor will meet regularly with the IHSS Supervisors, the QA Specialist and the Public Authority. The SIU Supervisor will also be the liaison to the DHCS Fraud Investigator assigned to San Mateo County.

Enclosure D is attached.

Collaboration and Partnership with California Department of Health Care Services (DHCS) and the California Department of Social Services (CDSS)

The IHSS QA Specialist will continue to maintain communication with the DHCS Investigator. Cases are forwarded to DHCS for investigation. The County's SIU Supervisor will now review all cases identified for investigation and act as a liaison to the DHCS investigators. IHSS will continue to follow the State program integrity and fraud prevention plans and complete the required reports as directed.

Mechanism for Tracking/Reporting

The QA Specialist currently maintains a file on each case forwarded to DHCS and routinely will inquire on cases with more than \$10,000. The Director of Aging and Adult Services and IHSS Program Manager are informed on these cases on a monthly basis.

Enhancements: San Mateo County will submit final data for FY210-11 by August 1, 2011, as required, that will quantify program integrity efforts. A specialized database will be developed to track each category.

Description of how the County will Integrate Other Program Integrity Efforts with the Plan

San Mateo County centralizes all the QA and fraud prevention activities under the IHSS QA Plan FY 2010-11 submitted to IHSS QA . San Mateo County will revise its existing plan to include the new regulations and the proposed plan. Enhancements include analysis, prevention and continuous quality improvement.

Annual Outcomes Report

An annual outcomes report will be submitted by August 1st of each year. San Mateo County will follow the CDSS format.

Budget Justification
San Mateo Fraud Funding Plan for FY 2010-11

Budget Section	Total
A. Personnel Costs (includes employee benefits)	\$179,053
B. Operating Expenses	35,523
C. Equipment Expenses	1,500
D. Travel/Per Diem and Training	1,500
E. Subcontracts/Contract	89,000
Total Expenses	\$306,576

A. Personnel Costs (including employee benefits)	Total Budget
<p>Title: Social Worker III 1.0 FTE</p> <p>Salary Calculation: FY Salary (\$78,750) Benefits (\$46,250)</p> <p>IHSS Program Integrity and Anti-Fraud Duties:</p> <ul style="list-style-type: none"> • Caseload assignment will be cases suspected of fraud and pending investigations • Prepare case summaries for cases pending fair hearings • Attend all Fair hearing cases 	\$125,000
<p>Title: Special Investigation Supervisor .1 FTE</p> <p>Salary Calculation: FY Salary (\$8,853) Benefits (\$5,200)</p> <p>IHSS Program Integrity and Anti-Fraud Duties:</p> <ul style="list-style-type: none"> • Consultation and case review • Liaison with DHS Investigator • Staff training 	\$14,053
<p>Title: Deputy District Attorney .1 FTE</p> <p>Salary Calculation: FY Salary (\$12,600) Benefits (\$7,400)</p> <p>IHSS Program Integrity and Anti-Fraud Duties:</p> <ul style="list-style-type: none"> • Legal consultation of potential prosecution cases • Legal consultation of fraud investigation 	\$20,000
<p>Title: County Counsel .1 FTE</p> <p>Salary Calculation: FY Salary (\$12,600) Benefits (\$7,400)</p> <p>IHSS Program Integrity and Anti-Fraud Duties:</p> <ul style="list-style-type: none"> • Legal counsel on employee/employer law • Legal counsel on regulation interpretation 	\$20,000
B. Operating Expenses	Total Budget
Administrative Overhead	\$35,523

C. Equipment Expenses	Total Budget
Computer software, lap top computer,	\$1,500
D. Travel/Per Diem and Training	Total Budget
Training materials, travel	\$1,500
E. Subcontracts and Consultants	Total Budget
Contract with San Mateo Public Authority for Provider Training	\$20,000
Contract with community provider for Recipient Training	\$15,000
Contract with Community Provider for Occupational Therapy Consultation to conduct assessments on those cases suspected of fraud.	\$20,000
Contract with the San Mateo County Public Authority fir a .5 FTE Program Integrity Office Specialist Salary Calculation: FY Salary (\$21,420) Benefits (\$12,580) IHSS Program Integrity and Anti-Fraud Duties: <ul style="list-style-type: none"> • Time Card review • Consultation and follow-up with Social Workers, Quality Assurance Specialist • Office Specialist support to Anti-Fraud Staff 	\$34,000
Total Budget	\$306,576

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

San Mateo County is requesting participation in the IHSS Fraud Prevention Program and will submit a Plan and data as described above, by September 1, 2010.

Board of Supervisors Approval

Approved on _____, 2010, by the County Board of Supervisors

Name of Approver: Richard S. Gordon Title: Supervisor
President of the Board

Signature _____

Board of Supervisors

Name of Representative: _____ Title: Supervisor
President of the Board

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ATTEST:

By: _____
Clerk of Said Board