

**DEPARTMENT OF HEALTH SERVICES
DIVISION OF HEALTH CARE ACCESS AND
ACCOUNTABILITY
ADMINISTRATOR'S MEMO SERIES**


NOTICE: 10-02

DATE: November 02, 2010

DISPOSAL DATE: Ongoing

RE: Public Assistance Fraud
Program Allocations and
Guidelines for CY 2011

TO: County Departments of Human Services Directors
County Departments of Social Services Directors
Tribal Chairpersons/Human Services Facilitators
Tribal Economic Support Directors

FROM: Jason A. Helgerson, Administrator  For JAH
Division of Health Care Access and Accountability

PURPOSE

The purpose of this memo is to provide information regarding DHS Public Assistance Fraud Program (PAFP) Funding for CY 2011.

BACKGROUND

In 2006, based on a request from the Income Maintenance Advisory Committee (IMAC), DHS formed an ad hoc subcommittee with local agency representatives to re-evaluate how the PAFP is administered in Wisconsin and make recommendations for program improvement.

The subcommittee recommended model focused on prevention, using Fraud Prevention Investigation (FPI) staff dedicated to provide all investigation activities under a single funding source, utilizing local agency and/or private contracted investigators.

The FPI model was piloted in two project areas in 2007 and in five project areas (25 agencies) in 2008 and 2009. The FPI consortium's allocations were based on caseload size. The pilot identified several advantages of the FPI model:

- Availability of a trained professional investigator for all agencies
- Consistent entry of fraud prevention data in CARES
- Payment error reduction
- Increased revenue from benefit recovery retention (FoodShare and Medicaid)

CY 2011 PUBLIC ASSISTANCE FRAUD PREVENTION PROGRAM

DHS has earmarked one-time funding in the amount of \$500,000 (all funds) to support statewide fraud prevention activities for the FoodShare, Wisconsin Medicaid, and BadgerCare Plus programs in calendar year (CY) 2011 in all agencies. Ongoing funding options will be discussed in the coming months.

For CY 2011, this funding will be used to facilitate the formation of several FPI Consortiums across the state, with the exception of Milwaukee Enrollment Services (MilES) and the Enrollment Services Center (ESC). This concept calls for one full-time investigator to serve a consortium of agencies, with one of those agencies assuming the role of administrative agency for the consortium.

Local agencies have the following options:

1. Take the lead or participate as part of a regional consortium,
2. Become part of a statewide fraud detection and investigation contract administered by the Wisconsin Department of Health Services, or
3. Manage these activities for their own county or tribal agency.

The Department will allocate an amount based on each agency's percentage of the statewide income maintenance caseload, excluding MiES and ESC, for agencies that elect Option 1 or 2 listed above. Agencies are required to provide a 10% match to the amount allocated by DHS in order to participate in Options 1 or 2.

If the agency elects to become part of the statewide contract (Option 2) the agency's allocation and 10% matching funds will be added to that contract. These agencies will be provided the fraud detection and investigation services using the same service provider selected for MiES and the ESC.

Local agencies that choose to manage their own fraud program will receive no funding other than the State pass-through of the federal matching funds on the agency's fraud expenditures through their existing IMAA overmatch. The allocation for any agency that chooses option 3 will be cost allocated to all agencies that choose Option 1.

The table below breaks down the responsibilities for fraud prevention under this model.

Roles and Responsibilities under DHS 2011 FPI Model		
DHS	Local Agencies	FPI Regional Consortium or State-led Effort
Monitor contract with FPI	Front End Verification using an Error Prone Profile	Fraud Prevention Investigation
Policy and process guidance for agencies and FPI	FPI referrals to investigator	Enter FPI data in CARES
Develop statewide client education materials	Claims establishment for overpayments	Agency education on FEV and Fraud referrals
Guidance/technical assistance on trafficking enforcement	Timely report of action taken on case(s) investigated by FPI	Administrative Disqualification Hearing process for FPI cases
Maintain statewide fraud hotline and refer cases warranting investigation to FPI	Criminal prosecution of intentional program violations	Regular meetings/update with DHS

This model is based on the following assumptions:

1. DHS will allocate funding specified in Schedule A for each agency that forms or joins a consortium of counties/tribes **and** contributes local funds in the amount specified for their agency in Schedule A.
2. A qualifying consortium should consist of a least six (6) counties and/or tribes or be comprised of agencies that represent at least nine (9) percent of the total IM caseload (47,028 cases) as specified on Schedule A.
3. Local agencies may contribute more than the amount in Schedule A and the total local contribution will be eligible for the 50% federal match for all allowable costs.
4. Schedule A allocations are based upon unduplicated IM caseloads from a point-in-time representative month served by each agency during CY 2010.
5. All agencies must comply with the requirements of the FPI guidelines. These guidelines will be incorporated into the Income Maintenance Manual (IMM) and include these provisions:
 - a. The FPI program should emphasize fraud prevention over fraud detection.
 - b. The FPI program should emphasize administrative processes over criminal

- adjudication.
- c. The FPI program must be cost neutral such that total administrative costs do not exceed total program savings as measured by future savings, claims established and sanctions. FPI project areas should target a ratio of savings to costs at 5:1.
 - d. An investigation is essentially the same for fraud prevention and fraud detection. FPI investigations will be categorized a pre-certification or post-certification primarily for federal reporting purposes.
 - e. DHS will monitor FPI performance relative to cost-benefit ratio, timeliness of completions and number of investigations completed.
 - f. To ensure timely and accurate data, FPIs shall be responsible for entering all data related to fraud investigation activities on the CARES fraud investigation tracking screens (FITS).

FORMING YOUR CONSORTIUM

- In order to have a consortium in place and active by January 1, 2011, agencies must submit all necessary documents (see Schedule B) to Mike McKenzie at DHS no later than December 10, 2010.
- You must inform DHS in writing to the e-mail address listed below if you do not intend to participate in a consortium before December 10, 2010.
- The implementation start date for your consortium can be after January 1, 2011 with approval from DHS. The start date can be no later than March 1, 2011.
- Agencies that choose Option 2 (join the MiES/ESC contract) will have services available sometime between January 1 and March 1, 2011.
- Columbia County DHHS currently administers an FPI consortium for Central Wisconsin.
- Eau Claire County DHS currently administers an FPI consortium that includes three (3) other agencies in Western Wisconsin.
- Ashland, Dane, and Douglas Counties all administered FPI pilot programs in 2008 and 2009.

CENTRAL OFFICE CONTACTS

For questions or assistance regarding any of the information contained in this memo, please contact Mike McKenzie at (608) 266-0930 or by e-mail at Michael.Mckenzie@dhs.wi.gov.

All materials should be mailed to:

Mike McKenzie, FPI Program Manager
Room 465, 1 West Wilson Street
Wisconsin Department of Health Services
PO Box 309
Madison, WI53701-0309

For fiscal questions or assistance regarding program cost reporting, please contact Stacia Jankowski at (608) 267-9312 or by e-mail at Stacia.Jankowski@dhs.wi.gov.

SCHEDULE A

IM CASELOAD BY AGENCY

PERCENT OF TOTAL IM STATE CASELOAD BY
AGENCY

RESULTING FPI ALLOCATION BY AGENCY

LOCAL AGENCY CONTRIBUTION

FEDERAL MATCH TO AGENCY CONTRIBUTION

TOTAL FUNDING BY AGENCY

DHS FRAUD PREVENTION INVESTIGATION ALLOCATIONS FOR CY 2011

AGENCY	UNDUPLICATED CASELOAD*	PERCENT OF TOTAL	STATE FUNDING	AGENCY MATCH	FED MATCH TO COUNTY \$	TOTAL FUNDING
ADAMS COUNTY	1,973	0.38%	\$3,218	\$322	\$322	\$3,861
ASHLAND COUNTY	2,033	0.39%	\$3,316	\$332	\$332	\$3,979
BARRON COUNTY	4,825	0.92%	\$7,869	\$787	\$787	\$9,443
BAYFIELD COUNTY	1,053	0.20%	\$1,717	\$172	\$172	\$2,061
BROWN COUNTY	15,438	2.95%	\$25,178	\$2,518	\$2,518	\$30,213
BUFFALO COUNTY	1,011	0.19%	\$1,649	\$165	\$165	\$1,979
BURNETT COUNTY	1,457	0.28%	\$2,376	\$238	\$238	\$2,851
CALUMET COUNTY	2,032	0.39%	\$3,314	\$331	\$331	\$3,977
CHIPPEWA COUNTY	5,097	0.98%	\$8,313	\$831	\$831	\$9,975
CLARK COUNTY	2,581	0.49%	\$4,209	\$421	\$421	\$5,051
COLUMBIA COUNTY	3,494	0.67%	\$5,698	\$570	\$570	\$6,838
CRAWFORD COUNTY	1,434	0.27%	\$2,339	\$234	\$234	\$2,806
DANE COUNTY	23,136	4.43%	\$37,732	\$3,773	\$3,773	\$45,279
DODGE COUNTY	5,235	1.00%	\$8,538	\$854	\$854	\$10,245
DOOR COUNTY	1,860	0.36%	\$3,033	\$303	\$303	\$3,640
DOUGLAS COUNTY	4,078	0.78%	\$6,651	\$665	\$665	\$7,981
DUNN COUNTY	3,286	0.63%	\$5,359	\$536	\$536	\$6,431
EAU CLAIRE COUNTY	7,636	1.46%	\$12,454	\$1,245	\$1,245	\$14,944
FLORENCE COUNTY	457	0.09%	\$745	\$75	\$75	\$894
FOND DU LAC COUNTY	6,323	1.21%	\$10,312	\$1,031	\$1,031	\$12,375
FOREST COUNTY	881	0.17%	\$1,437	\$144	\$144	\$1,724
GRANT COUNTY	3,562	0.68%	\$5,809	\$581	\$581	\$6,971
GREEN COUNTY	2,584	0.49%	\$4,214	\$421	\$421	\$5,057
GREEN LAKE COUNTY	1,324	0.25%	\$2,159	\$216	\$216	\$2,591
IOWA COUNTY	1,481	0.28%	\$2,415	\$242	\$242	\$2,898
IRON COUNTY	714	0.14%	\$1,164	\$116	\$116	\$1,397
JACKSON COUNTY	1,662	0.32%	\$2,711	\$271	\$271	\$3,253
JEFFERSON COUNTY	5,139	0.98%	\$8,381	\$838	\$838	\$10,057
JUNEAU COUNTY	2,107	0.40%	\$3,436	\$344	\$344	\$4,124
KENOSHA COUNTY	13,454	2.57%	\$21,942	\$2,194	\$2,194	\$26,330
KEWAUNEE COUNTY	1,235	0.24%	\$2,014	\$201	\$201	\$2,417
LACROSSE COUNTY	8,407	1.61%	\$13,711	\$1,371	\$1,371	\$16,453
LAFAYETTE COUNTY	1,104	0.21%	\$1,801	\$180	\$180	\$2,161
LANGLADE COUNTY	2,110	0.40%	\$3,441	\$344	\$344	\$4,129
LINCOLN COUNTY	2,428	0.46%	\$3,960	\$396	\$396	\$4,752
MANITOWOC COUNTY	5,333	1.02%	\$8,698	\$870	\$870	\$10,437
MARATHON COUNTY	9,211	1.76%	\$15,022	\$1,502	\$1,502	\$18,027
MARINETTE COUNTY	3,717	0.71%	\$6,062	\$606	\$606	\$7,274
MARQUETTE COUNTY	1,175	0.22%	\$1,916	\$192	\$192	\$2,300
MONROE COUNTY	3,152	0.60%	\$5,141	\$514	\$514	\$6,169
MILWAUKEE COUNTY	113,130	28.22%				
OCONTO COUNTY	2,538	0.49%	\$4,139	\$414	\$414	\$4,967
ONEIDA COUNTY	3,012	0.58%	\$4,912	\$491	\$491	\$5,895
OUTAGAMIE COUNTY	8,545	1.64%	\$13,936	\$1,394	\$1,394	\$16,723
OZAUKEE COUNTY	2,897	0.55%	\$4,725	\$472	\$472	\$5,670
PEPIN COUNTY	624	0.12%	\$1,018	\$102	\$102	\$1,221
PIERCE COUNTY	1,891	0.36%	\$3,084	\$308	\$308	\$3,701
POLK COUNTY	3,342	0.64%	\$5,450	\$545	\$545	\$6,541
PORTAGE COUNTY	4,513	0.86%	\$7,360	\$736	\$736	\$8,832
PRICE COUNTY	1,644	0.31%	\$2,681	\$268	\$268	\$3,217

DHS FRAUD PREVENTION INVESTIGATION ALLOCATIONS FOR CY 2011

AGENCY	UNDUPLICATED CASELOAD*	PERCENT OF TOTAL	STATE FUNDING	AGENCY MATCH	FED MATCH TO COUNTY \$	TOTAL FUNDING
RACINE COUNTY	15,358	2.94%	\$25,047	\$2,505	\$2,505	\$30,057
RICHLAND COUNTY	1,726	0.33%	\$2,815	\$281	\$281	\$3,378
ROCK COUNTY	14,031	2.69%	\$22,883	\$2,288	\$2,288	\$27,460
RUSK COUNTY	1,758	0.34%	\$2,867	\$287	\$287	\$3,441
ST. CROIX COUNTY	3,904	0.75%	\$6,367	\$637	\$637	\$7,640
SAUK COUNTY	4,409	0.84%	\$7,191	\$719	\$719	\$8,629
SAWYER COUNTY	2,055	0.39%	\$3,351	\$335	\$335	\$4,022
SHAWANO COUNTY	2,968	0.57%	\$4,840	\$484	\$484	\$5,809
SHEBOYGAN COUNTY	7,333	1.40%	\$11,959	\$1,196	\$1,196	\$14,351
TAYLOR COUNTY	1,799	0.34%	\$2,934	\$293	\$293	\$3,521
TREMPEALEAU COUNTY	2,222	0.43%	\$3,624	\$362	\$362	\$4,349
VERNON COUNTY	2,030	0.39%	\$3,311	\$331	\$331	\$3,973
VILAS COUNTY	1,347	0.26%	\$2,197	\$220	\$220	\$2,636
WALWORTH COUNTY	6,699	1.28%	\$10,925	\$1,093	\$1,093	\$13,110
WASHBURN COUNTY	1,788	0.34%	\$2,916	\$292	\$292	\$3,499
WASHINGTON COUNTY	5,573	1.07%	\$9,089	\$909	\$909	\$10,907
WAUKESHA COUNTY	11,804	2.26%	\$19,251	\$1,925	\$1,925	\$23,101
WAUPACA COUNTY	4,179	0.80%	\$6,816	\$682	\$682	\$8,179
WAUSHARA COUNTY	1,920	0.37%	\$3,131	\$313	\$313	\$3,758
WINNEBAGO COUNTY	9,978	1.91%	\$16,273	\$1,627	\$1,627	\$19,528
WOOD COUNTY	6,341	1.21%	\$10,342	\$1,034	\$1,034	\$12,410
MENOMINEE COUNTY	738	0.14%	\$1,204	\$120	\$120	\$1,444
ESC	102,834	25.66%				
RED CLIFF TRIBE	302	0.06%	\$493	\$49	\$49	\$591
STOCKBRIDGE-MUNSEE TRIBE	98	0.02%	\$160	\$16	\$16	\$192
POTAWATOMI TRIBE	41	0.01%	\$67	\$7	\$7	\$80
LAC DU FLAMBEAU TRIBE	645	0.12%	\$1,052	\$105	\$105	\$1,262
BAD RIVER TRIBE	243	0.05%	\$396	\$40	\$40	\$476
SOKAOGON TRIBE	136	0.03%	\$222	\$22	\$22	\$266
ONEIDA TRIBE	930	0.18%	\$1,517	\$152	\$152	\$1,820
TOTAL UNDUPLICATED CASES	522,544	100.00%	\$500,000	\$50,000	\$50,000	\$600,000

* Based on June 2010 caseload data

SCHEDULE B

FPI GRANT APPLICATION/AGREEMENT WITH ATTACHMENTS:

ATTACHMENT 1 – FPI POSITION DESCRIPTION TEMPLATE

ATTACHMENT 2 – FPI ORGANZATIONAL CHART MODEL

ATTACHMENT 3 – CONTRACTED INVESTIGATOR REQUIREMENTS

ATTACHMENT 4 – COOPERATIVE AGREEMENT TO BE SIGNED BY AGENCIES

**FRAUD PREVENTION INVESTIGATION
2011 GRANT APPLICATION/AGREEMENT
Department of Health Services
PUBLIC ASSISTANCE FRAUD PROGRAM**

INTRODUCTION

To support program integrity for FoodShare (FS), Wisconsin Medicaid, and BadgerCare Plus, DHS has established a Fraud Prevention Investigation (FPI) program. The FPI program is administered through contractual agreements between DHS and local administrative agencies. Participating local agencies shall receive DHS-approved FPI grants for calendar year (CY) 2011.

GRANT APPLICATION

For participation in the DHS FPI program, administrative agencies shall complete the FPI Grant Application, including any required attachments. Upon approval by DHS, the participating agency agrees to comply with the operational and administrative requirements for the FPI program as established by DHS in the **FPI Program Guide**.

The FPI Grant Application shall consist of the budget proposal (Budget Worksheet) to fund the identified FTE percentage FPI Investigator for a calendar year and the designated agency staff responsible for the administration/supervision of the FPI Grant/Agreement, and the following attachments:

1. The position descriptions for all FPI funded agency/office staff (See Attachment 1 for an example of a recommended position description).
2. A copy of the agency's policy and/or practice, including any forms and documents, for the administrative disposition of FPI referral found to have committed an intentional program violation (IPV).
3. An organizational chart showing the agency's administrative structure, including all FPI staff and/or contracted service providers (See Attachment 2 for model of organization chart).
4. A copy of all contracts that the agency has with FPI funded service providers (See Attachment 3 for contracted investigator requirements).
5. A copy of the Cooperative Agreement(s) from all participating agencies receiving investigation services from the FPI Grant/Agreement when applicable (See Attachment 4).

APPROVAL PROCESS

Submit the completed and signed FPI Grant Application to:

Mike McKenzie, FPI Program Manager
Room 465, 1 West Wilson Street
Wisconsin Department of Health Services
P.O Box 309
Madison, WI 53701-0309
FAX: (608) 261-7792
Email: Michael.McKenzie@dhs.wisconsin.gov

Upon approval by DHS, a copy of the signed Grant/Agreement will be sent to the administrative agency. DHS will amend the agency State/County Contracts and revised the CARS fiscal reporting system as needed.

2011 FPI GRANT APPLICATION/AGREEMENT

This FPI Grant Application for _____ Consortium is for the operation of a Calendar Year 2011 Public Assistance Fraud Program Fraud Prevention Investigation Program. The FPI Program will be administered by the agency identified below:

Name of Administering Agency	
Mailing Address	
City State Zip Code	
Contact Person and Title	
Telephone Number	
E-mail Address	

The 2011 FPI program will be supervised by the individual identified below:

Supervisor Name and Title	
Telephone Number	
E-mail Address	

The 2011 FPI program will fund a _____ FTE Investigator or equivalent in contracted investigative services based on the following estimated expenditures:

FPI COSTS WORK SHEET	
SALARY	\$
FRINGE BENEFITS	\$
EQUIPMENT & SUPPLIES	\$
TRAVEL	\$
TRAINING	\$
OTHER DIRECT COSTS	\$
INDIRECT COSTS/AMSO	\$
CONTRACTED COSTS	\$
OTHER (Describe)_____	\$
TOTAL COSTS	\$ _____

The 2011 FPI program costs will be covered by the following funding sources:

FPI FUNDING SOURCES WORK SHEET	
DHS ALLOCATION	\$
REQUIRED AGENCY CONTRIBUTION	\$
50% FEDERAL MATCH to DHS and AGENCY CONTRIBUTIONS	\$
ADDITIONAL AGENCY CONTRIBUTIONS	\$
50% FEDERAL MATCH to ADDITIONAL AGENCY CONTRIBUTIONS	\$
OTHER (Describe) _____	\$
TOTAL FUNDING	\$ _____

Attached as part of this application are the following checked-off attachments:

- ☐ The position descriptions for all FPI funded agency/office staff. (See Attachment 1 for an example of a recommended position description.)
- ☐ A copy of the agency's policy and/or practice, including any forms and documents, for the administrative disposition of FPI referral found to have committed an IPV.
- ☐ An organizational chart showing the agency's administrative structure, including all FPI staff and/or contracted service providers. (See Attachment 2 for model of organization chart.)
- ☐ A copy of all contracts that the agency has with FPI funded service providers. (See Attachment 3 for contracted investigator requirements.)
- ☐ A copy of the Cooperative Agreement(s) from all participating agencies receiving investigation services from the FPI Grant/Agreement. (See Attachment 4)

It is understood that the DHS **FPI Program Guide** is incorporated as part of this FPI Grant/Agreement and that the agency shall meet the operational and administrative requirements contained within.

I certify that this agency shall comply with the terms and conditions in this Grant/Agreement.

Signature of Agency Director/Designee

Date

Title

For any questions regarding this application, contact the FPI Program Manager, Mike McKenzie at (608) 266-0930 or at Michael.McKenzie@dhs.wisconsin.gov

MODEL POSITION DESCRIPTION FOR FPI POSITION

Job Summary:

Under the direct supervision of the Economic Support (ES) Supervisor, this position shall function as the agency's Fraud Prevention Investigator (FPI).

Position Responsibilities

- 70% A. Conduct timely and thorough fraud prevention investigations upon receipt of referrals.
 - 1. Maintain a log of all investigation referrals made by ES staff and others.
 - 2. Determine if the referral meets the agency's error-prone profile and investigation criteria.
 - 3. Identify what error-prone elements are involved in the referral and develop an investigation plan.
 - 4. Conduct the investigation within the agency's specified time frame in accordance with the FPI Guidelines and IMM Chapter 3.
 - 5. Document all investigation findings.
 - 6. Report investigation findings to the ESS/ES Supervisor.
 - 7. Ensure that appropriate action is taken in response to findings.
 - 8. Take lead in pursuing administrative hearings regarding the investigation and its findings.
- 10% B. Serve as agency's gatekeeper.
 - 1. Review all FPI referrals for appropriateness and priority.
 - 2. Ensure that all required investigation data is entered on CARES.
 - 3. Complete all records required for local, state and federal record keeping and reporting requirements.
 - 4. Coordinate Administrative Disqualification Hearing (ADH) process for agency
 - 5. Cooperate with local District Attorney (DA) in prosecution of public assistance fraud cases initiated by the county.
- 10% C. Provide fraud detection and referral training to county/tribal IM/W-2 eligibility workers and supervisors.
 - 1. Assist staff to understand the FPI process.
 - 2. Assist staff to identify cases that should be referred.
 - 3. Show staff how to refer cases on the BVIR screen
- 10% D. Cooperate with state Public Assistance Fraud Section (PAFS) on implementation of FPI procedures.
 - 1. Comply with FPI Guidelines, CARES reporting guidelines and IMM Chapter 3 policy.
 - 2. Inform county agency on FPI program progress.
 - 3. Assist county agency in development of agency's fraud plan and/or FPI grant proposal development.

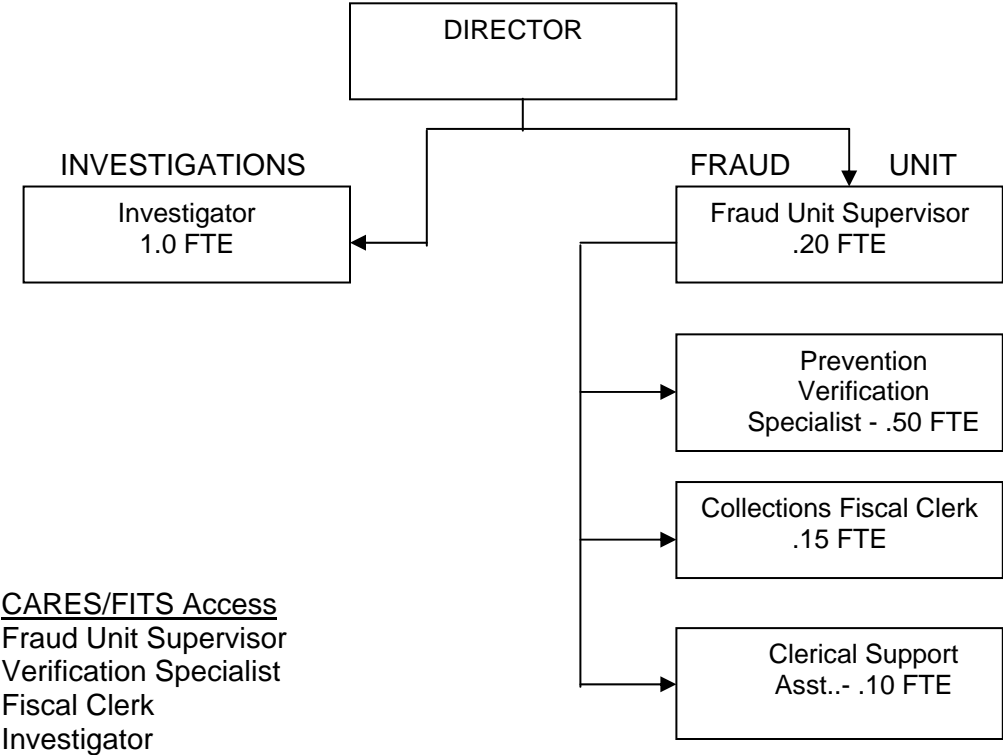
MODEL ORGANIZATIONAL STRUCTURE

A model fraud program "organizational chart" including the following information:

- 1. Reporting relationships;
- 2. Program areas;
- 3. Position titles;
- 4. FTE; and
- 5. Incumbent's name.

The agency must list all persons authorized to access the CARES/FITS screens.

Agency Fraud Program Organization



CONTRACTED INVESTIGATION SERVICES REQUIREMENTS

References:

WI Stat. 440.26

Administrative Code Chapter RL 30, 31, 32, 33, 34 and 35

Commercial agencies which contract with counties or tribes to provide fraud prevention investigative services are subject to the Wisconsin Statute and Administrative Code requirements for private detectives. These requirements do not apply to off-duty law enforcement officers or public officers performing official duties, including law enforcement officers. Private individuals, including former law enforcement officers, must meet these requirements. See DES Administrator's Memo 90-39.

Counties or tribes deciding to contract with private agencies or individuals for investigative services need to obtain a copy of WI Statute 440.26 and Administrative Code Chapter RL 30, and require that the individual meet the private detective requirements for licensure, training and liability.

2011 COOPERATIVE AGREEMENT FRAUD PREVENTION INVESTIGATION PROGRAM

This Agreement by and between the State of Wisconsin, Department of Health Services (DHS), Division of Health Care Access and Accountability (DHCAA) through its agent _____ County/Tribal Department of Human/Social Services acting as the Fraud Prevention Investigation District Administrative Agency (FPI District Administrative Agency) and _____ County/Tribal Agency, through its Department of Human/Social Services.

1. The purpose of this agreement is to:
 - a. Meet the various requirements of Wis. Stats. Chapter 49 for maintaining, establishing and funding effective fraud prevention investigation programs in counties/tribes pursuant to the FPI District Proposal and Grant Application covering the period January 1, 2011 through December 31, 2011.
 - b. Serve as the basis for establishing the organizational and operational structures for providing FPI services to counties/tribes in a geographical area, hereinafter referred to as FPI Districts, pursuant to operational requirements, forms and reporting mechanisms as contained in the FPI Program Guidelines (FPI Guidelines) developed by DHS and incorporated into this agreement by reference, hereto.
2. As an FPI District participant, the County/Tribal Agency commits itself to the following:
 - a. Cooperate with DHS and the FPI District Administrative Agency in fulfilling the goals and objectives of the FPI Program pursuant to FPI Guidelines, federal laws and regulations, Wisconsin Statutes, applicable DHS rules and county/tribal ordinances.
 - b. Cooperate with the FPI District Administrative Agency in monitoring referrals, completed investigations and case actions taken as a result of fraud prevention investigations.
 - c. Cooperate with the FPI District Administrative Agency and DHS in submission of narrative, financial and/or statistical reports either as required by FPI Guidelines or as requested by DHS.
 - d. Ensure that eligibility workers under its control make FPI referrals to the investigator representing the FPI District Administrative Agency, cooperate with case action reporting requirements and participate in FPI program related training.
 - e. Make use of the administrative disqualification hearing process pursuant to Wisconsin Statutes, IMM Chapter III and DHS Program Manuals when a completed fraud prevention investigation identifies an intentional program violation and no criminal action is pursued.

3. The FPI District Administrative Agency commits itself to the following tasks:
 - a. Provide FPI services and reports on FPI Program activity to the County/Tribal Agency.
 - b. Use qualified staff of investigators for providing FPI services.
 - c. Provide training to County/Tribal Agency eligibility workers on FPI forms and procedures.
 - d. Assist County/Tribal Agency in the identification and disqualification of individuals through the administrative disqualification hearing process when a completed fraud prevention investigation identifies an intentional program violation and no criminal action is pursued.
 - e. Cooperate with prosecutors if County/Tribal Agency decides to refer a fraud prevention investigation case to the District Attorney for prosecution.
4. _____ is designated as the responsible County/Tribal Agency contact official for ensuring cooperation and coordination with the FPI District Administrative Agency in fulfilling FPI program objectives.
5. Funding for the pilot FPI services provided to the County/Tribal Agency will be assigned to the FPI District Administrative Agency. If at any time funds from either federal or state sources become unavailable or are reduced, FPI services provided by the FPI District Administrative Agency may also be terminated or reduced.
6. The files, records, documents and accounting procedures and practices relevant to the pilot FPI program shall be subject to examination by DHS, the legislative auditors and auditors representing the federal funding agencies. County/Tribal Agency shall not use, willingly allow, or cause to have such materials used for any purpose except for the administration of public assistance programs in conformance with state and federal laws and regulations.

The agency director or other duly authorized official executes this agreement intending to be bound hereby:

COUNTY/TRIBAL HUMAN SERVICES/
SOCIAL SERVICES AGENCY:

BY: _____

TITLE: _____

DATE: _____

FPI DISTRICT ADMINISTRATIVE
AGENCY:

BY: _____

TITLE: _____

DATE: _____