

20-000.C. EARLY FRAUD DETECTION/PREVENTION OR FULL-FIELD REFERRAL

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20-000.C.1 Referrals

The intent of Early Fraud Detection/Prevention (EFD/P) is to have the investigator complete the investigation before an application is granted to prevent the issuance of aid to a deceptive applicant or to terminate fraudulently obtained benefits shortly after granting.

**20-000.C.2
Reasons for a
Referral**

A referral must be sent to the EFD/P investigator(s) when one of the following conditions is met:

- The SAWS1 date is less than 90 days old; or
- Renewal: An allegation/suspicion derived directly from the renewal process (i.e., information obtained from the renewal is in conflict with information in the case record and the applicant/recipient is unable to provide a satisfactory explanation), and a referral is made as soon as possible, following the renewal process; or
- Applications for new/additional funds, such as Temporary/Permanent Homeless Assistance (HA) or adding a newborn/returned absent parent to the existing case, etc.; and the referral is made within 90 days from that application date.

Exception: If a fraud referral related to the application for HA payment is made after a permanent HA payment was issued, the referral will be made to Full Field investigations, not EFD/P). The urgency to prevent further fraudulent HA payments no longer exist under such a circumstance, because the Assistance Unit is not eligible for more homeless payments after receipt of the permanent HA payment); or

- General Relief (GR) cases; or
- Incoming Inter-county Transfer (ICT) applications, if the referral is made within 90 days from the date the county receives the ICT notification.

In general, the goal of the Public Assistance Fraud (PAF) is to complete the EFD/P investigation within three to five workdays.

**20-000.C.3
Full Field**

Any fraud allegation that does not meet the criteria for an EFD/P referral shall be referred to Full Field investigations. PAF has 90 days from the assignment date to provide a report on a Full Field referral.

**20-000.C.4
Before
Referral is
initiated**

Before a referral is initiated, the Human Services Specialist (HSS) should contact the applicant/recipient to clarify the inconsistency, the allegation of providing untruthful information, etc., and obtain additional verification and/or sworn statements, as appropriate. In some instances, the applicant/recipient may be willing to cooperate and the concern may be resolved without a fraud referral.

**20-000.C.5
Detecting
Fraud**

The following are examples of actions to be taken by the HSS to detect any potential fraud, prior to initiating a referral:

Step	Action
1	Ask the applicant how he/she has been supporting his/her family before applying for aid
2	Ask the applicant/recipient how needs are being met if expenses exceed income and apply the following: <ul style="list-style-type: none">• Attempt to clarify the inconsistency• Determine the total amount of income reported by the applicant/recipient• Ask the applicant/recipient for an explanation of how the total amount of expenses is met.• Obtain additional verification and/or sworn statements as applicable.• Request a signed Release of Information to obtain third party verifications/statements as necessary.• Thoroughly document contacts with landlords, utility companies, etc. in the case record.
3	Use form 07-21 to request employment verification from the last known employer, as necessary. A applicant/recipient's signature on this form is required for information release
4	Review the prior case record. If the previous closing was due to Early Fraud Prevention or Full Field investigation actions, or applicant/recipient's request following the HSS contact regarding a fraud allegation, discuss the circumstances with a Fraud Prevention investigator assigned to the FRC or contact the PAF duty supervisor at (858) 514-6700

5	<p>Determine if the spouse/absent parent is in the United States Military. If so, request the spouse/absent parent's social security number and request a signed release of information to obtain allotment verification. Refer to the Fraud Prevention investigator if the HSS is unable to obtain verification of any contribution to the applicant/recipient from the military.</p> <p>Be alert for:</p> <ul style="list-style-type: none">• Applicants coming from areas that have military bases. Problems have been noted in Intercounty Transfers from Long Beach and San Francisco and in cases of applicant/recipients from the Seattle/Bremerton, Washington areas.• Any cases where the applicant/recipient claims to be residing with friends or relatives in military housing
6	<p>Question the applicant/recipient's reasons for obtaining a <u>delayed</u> birth certificate (within the last year or so). Request the applicant/recipient to provide the secondary documentation that was used to obtain the delayed birth certificate</p>

**20-000.C.6
Residency in
Question**

1. Ask the following when residence outside California/United States is suspected:
 - Does he/she have other children for whom aid is not requested; if so, where are they residing?
 - Is the spouse/absent parent living outside the country or in another state? Attempt to obtain his/her address and current employment?
 - Do they own or control any property, not only in the United States, but also outside of the country?
 - Each parent's full name, address, and the period the applicant/recipient resided with his/her parent(s) if the applicant/recipient states that he/she was living with his/her parent(s) outside the United States.
 - Question the applicant/recipient when he/she states that the whereabouts of the absent parent are unknown but believed to be outside the United States.
 - Does the applicant/recipient have a Passport, Border Crossing card or Mexican Voter Registration card?
 2. Question the applicant/recipient about any allegations/community complaints received on the case, such as; if the absent parent is residing with the family or the applicant/recipient has unreported income/property.
 3. Photocopy all I.D. cards presented. These photocopies should accompany the referral.
 3. If residency is in doubt, ask for a rental agreement or receipt, and/or a receipt from San Diego Gas & Electric indicating that the services have been established for the indicated address.
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**20-000.C.7
Pre-Referral
Contact**

During a pre-referral contact by the HSS, if the applicant/recipient admits having provided false information, the HSS will:

- Obtain the factual information, along with any available verifications and sworn statements, and thoroughly document the findings in the case record. In this situation, a referral may no longer be needed if there is no other doubt in existence.
- Re-evaluate the family's eligibility and/or recompute the budget using the new/correct information, and take any necessary and appropriate procedures, including referral to OSU, to recover any benefits paid which the applicant/recipient should not have received. OSU will contact PAF for further detailed information, as needed, and decide whether to refer the case to the District Attorney Office for prosecution.

If a referral appears to be necessary, the HSS is to review FRTS to determine whether a previous referral exists with investigation results pending. If yes, forward the new information/allegation, as appropriate, to PAF using the previous referral's tracking number. **DO NOT CREATE A NEW REFERRAL WHEN THERE IS ONE PENDING ON THE CASE.**

**20-000.C.8
Employment
Case Manager
Fraud Referral**

Form 07-51 HHSA, Employment Case Manager Fraud Detection/Prevention Referral has been developed for use by Employment Case Manager (ECM) to communicate suspected fraud to HSSs and Child Care Managers (CCM) and to receive response back regarding the outcome of the referral.

**20-000.C.9
ECM Action**

ECMs must take the following actions on suspicion of fraud:

If	Then
The allegations/suspicion is related to non-participation in WtoW.	The ECM must try to resolve it with the client before sending a 07-51 HHSA referral to an HSS or CCM.
The allegations/suspicion cannot be resolved with the participant.	The ECM must contact the HSS and/or CCM to find out if they are aware of the allegations/suspicion.

The HSS or CCM are unaware of the allegations/suspicion and is not working on resolving the allegation.	The ECM must submit the 07-51 HSA referrals with any supporting documentation and forward to the appropriate liaison.
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**20-000.C.10
HSS Action**

When a HSS/CCM receives a 07-51HSA referral from an ECM they must do the following:

- Review referral
- Complete HSS/CCM worker section indicating if a FRTS referral will be initiated.
- Return form to Liaison to log and route to initiating Liaison.
- File pink copy in case folder.

HSSs must follow the procedures for fraud outlined in CalWORKs Fraud and Integrity chapter. CCMs must follow child care fraud referral procedures when submitting a referral to PAF.
