

**County of San Diego, Health and Human Services Agency (HHSA)
Cash Assistance Program for Immigrants (CAPI) Program Guide**

Fraud and Integrity

Number

99-113.1

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Revision Date:

October 1, 2019

Background:

This section provides general information regarding fraud and integrity in CAPI.

Purpose:

This section is revised for the sunset review. No Program rules have changed.

Policy:

All eligibility staff will maintain program and case integrity. This includes:

- Knowledge of program and procedures
- Use of good interactive interviewing skills
- Review of case records, and customer written/verbal statements for consistency
- Knowledge of fraud and similar fault definitions
- Knowledge of fraud prevention and detection processes

1. Definitions:

The table below shows some terms used throughout this section and how they apply.

Term	Definition
Knowledge of Program and Procedures	Program and procedure knowledge is obtained through: <ul style="list-style-type: none"> • Formal training • Indirect on-the-job training • Use of written material, including: <ul style="list-style-type: none"> ○ Program Guides ○ Special Notices ○ Program/Policy Inquiries ○ Operational policies.
Use of Good Interactive Interviewing Skills	Interactive interviewing skills are obtained through formal and on-the-job training. Observing techniques of staff with good interactive interviewing skills also assists in developing skills. Good interactive interviewing skills include notifying the customer of his/her rights and responsibilities and being sure that he/she understands them.
Case Record Consistency	Case record consistency compares all documentation in the case record and verbal statements by the customer. Documentation must support eligibility and other decisions. Questionable information is examined. A determination is documented in the case file and includes appropriate back-up material. The determination may be documented in the case comments and/or other portions of the case record.
Knowledge of Fraud and Similar Fault Definitions	See the definitions of fraud and similar fault in 99-113.2.1.
Knowledge of Fraud Prevention/ Detection Processes	Clarification of inconsistent information and proper documentation prior to granting assistance is necessary for the appropriate amount of aid to be issued. For apparent fraud or questionable activity, know the steps necessary to refer to Public Assistance Fraud Division (PAFD), either for

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	Full Field or Early Fraud Detection/Prevention (EFD/P). See 99-113.2 for the processes and 99-113.4 for tools available for this activity.
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2. Responsibilities:

The table below shows the responsibilities for fraud detection/prevention.

Individual	Responsibility
FRC Manager	<ul style="list-style-type: none"> • Ensure maximum time is allowed for an accurate evaluation for eligibility determinations. • Ensure FRC staff is aware of and use all automated systems appropriate in the eligibility determination process.
Supervisor	<ul style="list-style-type: none"> • Review usage of automated information systems with workers to ensure usage of available information. • Ensure workers comply with current immediate need requirements by using the maximum time frame allowances for accurate results. • Assist workers in clarifying conflicting information. • Ensure denial and discontinuance action is taken within mandated time frames.
Worker	<ul style="list-style-type: none"> • Ensure customers understand their responsibility to provide accurate information and to promptly report any changes affecting eligibility determinations. • Gather accurate information and obtain verifications necessary to ensure accuracy. • Use automated information systems. • Determine if provided information is inconsistent or questionable. • Refer suspected fraud to the Public Assistance Investigator. • Complete the verification process before issuing aid payments or allowing aid payments to continue as per Chapter 99-100. • Authorize accurate aid payments for eligible applicants/recipients.

Procedure:

Follow the actions in the policies above for fraud and integrity in CAPI.

Other Program Impacts:

None.

References:

MPP 20-000 and 20-200

Sunset Date:

This policy will be reviewed for continuance on or by 10/31/2022

Approval for Release:



Rick Wanne, Director
Eligibility Operations