

90-170.5. FRAUD PREVENTION AND REFERRAL

A. General

This section shows the fraud prevention and referral procedures for the GR program.

B. Policy

Fraud prevention and identification is a primary goal of HHSA. Applicants and recipients who change their statements regarding their current situation must clarify the information in order to establish eligibility. It is the worker's responsibility to ensure that all information in the case file is consistent and conflicting information is clarified. Lack of clarification is cause for case denial or discontinuance. If conflicting information exists, it must be corrected or clarified by the applicant/recipient or a referral must be made to PAFD.

C. Definition of Fraud

Fraud exists when a person on his/her own, or on behalf of others, has knowingly and with intent to deceive or defraud:

- made a false statement or representation to obtain benefits, obtain a continuance or increase of benefits, or avoid a reduction of benefits;
- failed to disclose a fact which, if disclosed, could have resulted in a denial, discontinuance, or reduction of benefits;
- made statements which he/she knew to be untrue for the purpose of obtaining benefits, continuing to obtain benefits, or avoiding a reduction of benefits;
- accepted benefits to which he/she was not entitled, or accepted an amount of benefits knowing it was greater than the amount to which he/she was entitled.

Note: Situations where a person refused to return benefits mistakenly issued to him/her by the county, or to sign a timely notice waiver for benefit reduction/termination, are not considered fraudulent even though an overpayment may be caused by such a refusal.

D. Worker Role in Fraud Prevention/ Detection/ Referral

Workers are responsible for issuing GR assistance to applicants/recipients who meet all eligibility requirements. There are times when the documentation is questionable or the applicant's/recipient's information is not consistent. In these situations, inconsistencies must be clarified before issuing benefits.

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90-170.5. FRAUD PREVENTION AND REFERRAL, Continued

Worker Role in Fraud Prevention/ Detection/ Referral (continued)

The worker must make every effort to ensure that the applicant/recipient understands his/her responsibilities to provide truthful information and to report within 5 days any changes that may affect his/her eligibility and/or grant amount. Additionally, the applicant/recipient needs to understand the penalties for failing to report truthfully and promptly. These responsibilities must be reviewed with the applicant/recipient at each application and redetermination. Furthermore, the case record must be documented to reflect if the applicant/recipient appeared to understand these responsibilities.

The worker is required to obtain all mandated verifications and to review these verifications to determine if they are questionable, inconsistent, or appear to have been altered. The worker is to attempt to resolve any conflicting, inconsistent, or incomplete information with the applicant/recipient to the fullest extent possible. All contacts, responses from the applicant/recipient, and any additional information received as a result of contacts shall be fully documented in the case record. If the inconsistent or questionable information still cannot be resolved after the worker has contacted the applicant/recipient, the worker must then initiate a fraud referral.

If a questionable applicant/recipient situation exists and the worker is uncertain if a referral is appropriate, he/she should consult with his/her supervisor and/or the Fraud Prevention Investigator assigned to the FRC.

The table below shows the worker's responsibilities in preventing or detecting fraud.

Process	Action	
Ask the Right Questions	Workers have the right to ask questions regarding the applicant's/recipient's situation which pertain to eligibility for assistance.	
	If the ... information is not consistent with the previous case record information or the previous CW 7/QR 7,	Then ... the worker has the right to ask the applicant/recipient why the information is not consistent.
	applicant/recipient refuses to clarify inconsistent information,	aid must not be issued or continued.

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Worker Role in Fraud Prevention/ Detection/ Referral (continued)

Process	Action
Gather Accurate Information	It is the worker's responsibility to gather accurate information. If the applicant/recipient cannot provide accurate information, it is the worker's responsibility to assist the applicant/recipient. Third-party verification may be necessary in situations where the applicant/recipient cannot provide accurate information. The worker must verify information before issuing assistance or before allowing assistance to continue.
Review Documentation Carefully	All case documentation must be reviewed carefully for content and consistency. Each form, Case Comment, and piece of case documentation must build the history of the applicant's/recipient's situation. All forms and NOAs must be dated and allow the reader of a case file to understand the applicant's/recipient's situation.
Share Information Across Programs	<p>In situations where companion cases exist, workers must compare case information. New information such as IEVS reports must be shared with a worker who has the other active case. If information is not imaged for the companion case, a Case Comment must be made.</p> <p>In the case of CW 7s/QR 7s, GR requires that both spouses, if present in the household, must sign the CW 7/QR 7 to meet program integrity requirements. However, a companion CalFresh case only requires one signature. In this situation, a CalFresh SAR 7 that is not signed by both spouses is not valid for continuing GR. The GR worker must obtain both signatures before releasing any suspense holds.</p>

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Worker Role in Fraud Prevention/ Detection/ Referral (continued)

Process	Action										
Third-Party Contacts	<p>GR regulations require that third-party verifications will be obtained to verify conflicting information. If third-party verification is not obtainable, a sworn statement or detailed entry on the Statement of Facts may be used in rare circumstances, with supervisor approval. This may only be used as temporary documentation for income pending receipt of acceptable verification.</p> <p>The table below shows follow-up requirements.</p> <table border="1" data-bbox="459 716 1414 1016"> <thead> <tr> <th data-bbox="459 716 906 753">If ...</th> <th data-bbox="906 716 1414 753">Then ...</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 753 906 867">the verification is temporary,</td> <td data-bbox="906 753 1414 867">the worker must follow up within 30 days to obtain a permanent verification.</td> </tr> <tr> <td data-bbox="459 867 906 1016">a sworn statement is the only verification available and a future third-party verification cannot be obtained,</td> <td data-bbox="906 867 1414 1016">no follow up is required.</td> </tr> </tbody> </table>	If ...	Then ...	the verification is temporary,	the worker must follow up within 30 days to obtain a permanent verification.	a sworn statement is the only verification available and a future third-party verification cannot be obtained,	no follow up is required.				
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Sworn Statements	<p>A sworn statement will not be used as verification when third-party verification is available. Third-party verification is available in most instances. An example where third-party verification may not be available is for declared income from a swap meet.</p> <p>The table below shows possible Quality Assurance (QA) error citations.</p> <table border="1" data-bbox="459 1310 1414 1759"> <thead> <tr> <th data-bbox="459 1310 651 1348">Citation</th> <th data-bbox="651 1310 1414 1348">Cause</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 1348 651 1425">Third-Party Verification</td> <td data-bbox="651 1348 1414 1425">Case lacks required verifications/documents/actions to certify eligibility and grant amount.</td> </tr> <tr> <td data-bbox="459 1425 651 1503">Potential Dollar Error</td> <td data-bbox="651 1425 1414 1503">Worker obtained sworn statement, but fails to take required follow-up actions.</td> </tr> <tr> <td data-bbox="459 1503 651 1686">Information Item</td> <td data-bbox="651 1503 1414 1686">Worker obtained sworn statement. Verbal confirmation was provided by another individual who was to follow up in writing, but neglected to do so. Worker failed to follow up to obtain written confirmation.</td> </tr> <tr> <td data-bbox="459 1686 651 1759">No QA Error</td> <td data-bbox="651 1686 1414 1759">A sworn statement was the only documentation available.</td> </tr> </tbody> </table>	Citation	Cause	Third-Party Verification	Case lacks required verifications/documents/actions to certify eligibility and grant amount.	Potential Dollar Error	Worker obtained sworn statement, but fails to take required follow-up actions.	Information Item	Worker obtained sworn statement. Verbal confirmation was provided by another individual who was to follow up in writing, but neglected to do so. Worker failed to follow up to obtain written confirmation.	No QA Error	A sworn statement was the only documentation available.
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90-170.5. FRAUD PREVENTION AND REFERRAL, Continued

E. Suspicion of Employee Fraud Information indicating that HHSA employees may have assisted applicants/recipients to commit fraud or have committed fraud themselves must be elevated immediately to the Agency's Internal Investigation Section. All staff are expected to cooperate with the Internal Investigation Section. While the investigation is in progress, workers will take no action on the application in question or make any changes to an active case in question without consultation with the Internal Investigation Manager.

F. Allegation of Fraud The table below shows the treatment of allegations of fraud.

Allegation	Action
Fraud-Related Allegations	<p>These may require a referral when:</p> <ul style="list-style-type: none"> • Residency is questionable (i.e., non-existent addresses, living out of county, state, or country) • Questionable homeless status • Child, for whom aid is requested, is out of home • Unreported household members • Unreported income • Unreported property • Expenses exceed income (How are needs being met?) • Documentation submitted appears to have been altered or is counterfeit. • Duplicate aid <p>Note: Allegations of fraud involving HHSA employees are to be referred to Internal Investigations.</p>
Non-Fraud-Related Allegations	<p>These may not be fraud-related, but may require referral to another area, such as Child Protective Services:</p> <ul style="list-style-type: none"> • Child abuse/neglect • Drug/alcohol abuse • Non-payment of rent obligation

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90-170.5. FRAUD PREVENTION AND REFERRAL, Continued

Allegation of Fraud (continued)

Allegation	Action	
Fraud Hotline Allegations (PAFD of the DA's Office)	These referrals are forwarded, by pending them in the FRATS, to the worker of record on active, pending, or discontinued cases. Cases pending a pre-application number will have referrals forwarded to a regular intake worker when one is assigned. Closed case referrals are sent directly to PAFD, although allegations received during the month of case closure will still be referred to the worker of record. Actions to be taken by a FRC worker upon receipt of fraud allegations, through the Fraud Hotline, are:	
	Step	Action
	1	When the worker receives a FRATS printout indicating that a referral has been pending by the Fraud Hotline, he/she must review the information (for example, an allegation that the recipient has unreported income), prior to transmitting to PAFD, to determine if the information is: <ul style="list-style-type: none"> • known (i.e., documentation in the case), and eligibility and benefit level reflect this information; or • not known, and that the recipient must be contacted concerning the apparent discrepancy.
	Worker Resolves Issue	
	2	If the worker is able to resolve the issue, the referral is not forwarded to PAFD. Resolution would be verifying that the information has already been reported and used in the determination of eligibility or benefit amount and appropriate action has been taken but further PAFD involvement is not necessary.
	3	Replace the "P" on the question "Does BA refer to PAFD (FRAUD)?_ (YPR)?" on the WREF-3 screen in FRATS with an "R" for resolved, and a brief explanation of the situation/ actions taken in the "Additional Comments" section.
	Communication with PAFD	
	Step	Responsibility
4	Hotline Investigator	Accept, return, or request more information on the referral response from the worker.

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Allegation of Fraud (continued)

Allegation		Action
	Step	
	5	Complete the top section of the 3-part NCR Resolved Referral Correspondences form (PAFD/RRC-1). See Appendix A .
	6	Forward the original and one copy of the form to the worker for action, retaining the bottom copy for their records.
	7	Worker Review the information provided on the form by the PAFD Hotline Investigator upon receipt and take any necessary action as appropriate.
	8	Complete the response area in Section 2 of the Resolved Referral Correspondences form and include attachments as appropriate.
	9	Return the original completed response form with any attachments within 10 calendar days from receipt to PAFD, mail stop W413, attention: PAFD Hotline.
	10	Image the bottom case copy of the form in the case file.
	11	PAFD Track receipt of the Resolved Referral Correspondences form from the worker.
	12	Have the PAFD Hotline Investigator contact the worker to question the delay if no response has been received by the 10 th calendar day from receipt, and request a response within 5 calendar days.
	13	Have the PAFD Hotline Supervisor call the worker's supervisor regarding the delay if no response has been received by the 15 th calendar day from receipt, and request a response within 5 calendar days.

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Allegation of Fraud (continued)

Allegation	Action	
	Step	
	14	Have the PAFD Hotline Supervisor call the FRC Manager regarding the delay if no (continued)response has been received by the 20 th calendar day from receipt, and request a response within 5 calendar days.
	15	Have the PAFD Hotline Supervisor call the FRC Manager regarding the delay if no response has been received by the 20 th calendar day from receipt, and request a response within 5 calendar days.
	16	Have the PAFD Lieutenant call the FRC's Regional General Manager to resolve the delinquent response, if a response is not received.
	17	Document the disposition of the hotline referral upon receipt by completing Section 3 of the Resolved Referral Correspondence form.
Previous Referral		
	18	If a referral has previously been made on the case pending result of the investigation, the "R" entry above shall be made with an indication in the "Additional Comments" section that a referral has previously been made along with the tracking number.
	19	Any new information from the allegation, which was not included in the previous referral, has to be forwarded to PAFD by entering the information in the "Additional Comments" section of the WREF-3 screen along with the previous referral's tracking number.
Forwarding Referral to PAFD		
	20	If the worker determines that the allegation should be investigated by PAFD and there is no other referral pending on the case, the referral will be forwarded to PAFD by replacing the "P" with a "Y" in the "Does BA refer to PAFD (FRAUD)?_ (YPR)?" question on the WREF-3 screen.

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Allegation of Fraud (continued)

Allegation	Action	
	Step	
	21	The worker must explain what actions have been taken to resolve the complaint/allegation prior to forwarding it to PAFD in the "Additional Comments" section and promptly forward all copies of necessary attachments.
	22	Remember that any referral initiated by the Fraud Hotline has a pending status on FRATS. It is the FRC worker's responsibility to indicate its disposition in FRATS to avoid an indefinite pending status and/or duplicate referrals.
Allegations Received by FRCs	When a fraud allegation is received directly by the FRC, the person who is receiving the allegation is to document the complainant's name and address (if he/she is willing to provide this information), case identifying information, and content of the allegation. The worker of record will then investigate the allegation to the extent possible for resolution. Unresolved allegations shall be referred to PAFD for investigation.	

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G. EFD/P or Full Field Referrals

The table below shows the purpose of these two types of referrals.

Referral	Action
EFD/P Referral	<p>The intent of 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. A referral shall be sent to the EFD/P investigator(s) stationed in the FRC when one of the following conditions is met:</p> <ul style="list-style-type: none">• The application date is less than 90 days old• An allegation/suspicion derived directly from the redetermination process (i.e., information obtained from the redetermination is in conflict with information in the case record and the recipient is unable to provide a satisfactory explanation), and referral made as soon as possible, following the redetermination process.• The case is a GR case. <p>In general, the goal of PAFD is to complete the EFD/P investigation within three to five workdays.</p>
Full Field Referral	Full field referrals will only be made if recommended by PAFD.

H. Referral Process

The table below shows the referral process for GR.

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Referral Process (continued)

Step	Process/ Timing	Actions
1	Before the Referral	<p>Contact the applicant/recipient to clarify the inconsistency, the allegation of untruthful information, etc. and to obtain appropriate verification and/or sworn statements. The concern may be resolved without a fraud referral.</p> <p>Examples of actions to be taken by the worker, prior to initiating a referral, as a means of detecting fraud are:</p> <ul style="list-style-type: none"> • Ask the applicant how he/she has been supporting himself/herself or his/her family before applying for aid. • Ask the applicant/recipient how needs are met if expenses exceed income. • Review the prior case record. If the previous closing was due to EFD/P or Full Field investigation actions, or recipient's request following the worker's contact regarding a fraud allegation, discuss the circumstances with a EFD/P Investigator assigned to the FRC or contact the PAFD duty supervisor at 858-514-3290. • Determine if the spouse is in the United States military. If so, request the spouse's SSN and request a signed release of information to obtain allotment verification. Refer to the EFD/P Investigator if the worker is unable to obtain verification of any contribution to the applicant/recipient from the military. • Be alert for applicants coming from areas that have military bases. Problems have been noted in cases with applicants from Long Beach, San Francisco, and the Seattle/Bremerton, Washington areas. • Be alert for any cases in which the applicant/recipient claims to be residing with friends or relatives in military housing. • When residence outside California (for example, Mexico, Canada, etc.) is suspected: <ul style="list-style-type: none"> - Ask if the spouse is in Mexico or Canada, etc. and attempt to obtain his/her address and current employment. - Ask the applicant/recipient about any property they own or control, not only in the United States, but also outside of this country. - Ask if the applicant/recipient has a Border Crossing card or out-of country/state Voter Registration card.

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Referral Process (continued)

Step	Process/ Timing	Actions										
		<ul style="list-style-type: none"> • Question the applicant/recipient about the allegation/ community complaint received on the case, such as unreported income, property, or residence. • Photocopy all ID cards presented, if there are no know restrictions to photocopying. These photocopies should accompany the referral. • 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 at the indicated address. • Check the Assessor's screens, ST1S/ST1N and AS08, to verify ownership of real property and/or existence of a given address. <table border="1" data-bbox="540 976 1430 1824"> <thead> <tr> <th data-bbox="540 976 751 1014">If ...</th> <th data-bbox="751 976 1430 1014">Then ...</th> </tr> </thead> <tbody> <tr> <td data-bbox="540 1014 751 1308">the applicant/ recipient admits to having provided false information,</td> <td data-bbox="751 1014 1430 1308">obtain the factual information along with any available verifications and sworn statements, and thoroughly document the findings in the case record. This may negate the reason for a referral. Reevaluate eligibility and complete any necessary budget computations and other appropriate steps using the new information.</td> </tr> <tr> <td data-bbox="540 1308 751 1419">OSU is involved,</td> <td data-bbox="751 1308 1430 1419">they will contact PAFD as needed, and decide if to refer the case to the DA's Office for prosecution.</td> </tr> <tr> <td data-bbox="540 1419 751 1570">a referral appears to be necessary,</td> <td data-bbox="751 1419 1430 1570">review the WCHK screen on FRATS to discover if any previous referral is pending result of investigations on the case.</td> </tr> <tr> <td data-bbox="540 1570 751 1824">yes,</td> <td data-bbox="751 1570 1430 1824">forward the new information/allegation, as appropriate, to PAFD by entering the new information in the "Additional Comments" section on the WREF-3 screen and using the previous referral's tracking number. Do not create a new referral when there is one pending on the case.</td> </tr> </tbody> </table>	If ...	Then ...	the applicant/ recipient admits to having provided false information,	obtain the factual information along with any available verifications and sworn statements, and thoroughly document the findings in the case record. This may negate the reason for a referral. Reevaluate eligibility and complete any necessary budget computations and other appropriate steps using the new information.	OSU is involved,	they will contact PAFD as needed, and decide if to refer the case to the DA's Office for prosecution.	a referral appears to be necessary,	review the WCHK screen on FRATS to discover if any previous referral is pending result of investigations on the case.	yes,	forward the new information/allegation, as appropriate, to PAFD by entering the new information in the "Additional Comments" section on the WREF-3 screen and using the previous referral's tracking number. Do not create a new referral when there is one pending on the case.
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Referral Process (continued)

Step	Process/ Timing	Actions
2	Referral Initiated	<p>If the worker is unable to resolve the discrepancy, inconsistency, or fraud allegation after necessary steps have been taken and there is no previous referral pending, a fraud referral will be initiated. The worker will make the referral immediately upon determination that a referral is needed. The earlier a referral is made, the better the chance that the investigation result will be available before the granting action is taken or to decrease incorrect benefits timely. Fraud referrals are made using FRATS.</p> <p>The FRATS Narrative Section must contain:</p> <ul style="list-style-type: none"> • A clear, specific explanation of the suspicion/allegation. For example, name and address of the employer or source of other income, if known, on an unreported income allegation. • The period of time covered by the allegation. This is especially important for allegations on closed cases since what happens to the recipient after the case closed is no longer a concern to the case. • What steps the worker has taken trying to resolve the issue before the referral was made. <p>Note: Information regarding the availability and quality of evidence, the whereabouts of the person suspected of committing fraud, the length of time and dollar amount involved, prior willful overpayments, fraud convictions or suspected fraudulent history should be included in the referral if available.</p> <p>For a FRATS referral, a GR case must be pended in CalWIN. In the situation where a referral is made for a combination of CalFresh and GR, and CalFresh is pended before GR is opened, the referral can be made on the CalFresh case by answering "Y" to both CalFresh and GR on the WREF-3 screen.</p>

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Referral Process (continued)

Step	Process/ Timing	Actions
3	Referral Attachments	Attachments necessary for the investigation shall be forwarded to PAFD immediately upon completion of the referral on FRATS. EFD/P referral attachments or additional information received after the referral shall be given to an EFD/P investigator in the FRC. Full Field referral attachments shall be sent to PAFD at Mail Stop W-413. If the attachments on the referral, or those necessary for the investigations, are not received within 10 working days for a Full Field referral or 2 working days for an EFD/P referral, the referral may be returned. Any additional information received after the Full Field referral has been made will be sent to PAFD by using the "Additional Comments" section of the WREF-3 screen on FRATS. Use the WPRT screen to generate a printout.
4	Granting Actions Required Pending Investigation Result	In some instances, it may be necessary to grant aid prior to the completion of the investigation in order to meet requirements. Should a question arise whether to grant or delay, the worker is to discuss the case situation with his/her supervisor and document the decision in Case Comments.
5	Referral Returned	<p>The return of a referral by PAFD will not be the end of the process if the need for an investigation still exists. The response from PAFD will indicate the reason for returning the referral. The worker has the responsibility to evaluate, clarify, and resolve the issue and, if appropriate, promptly initiate a new referral to PAFD using a new tracking number. See 10, below, for reasons why fraud referrals are often returned.</p> <p>Unresolved issues between workers and investigators will be discussed between the respective supervisors as the means of resolution. If the supervisors cannot resolve issues, the chain of command will be used.</p>
6	Investigation Findings Received	Upon receipt of the findings from the investigator, the worker must make the eligibility/benefits amount determination based on the findings, the information provided by the applicant/recipient, and existing rules and regulations.

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Referral Process (continued)

Step	Process/ Timing	Actions
7	Fraud Exists	If it is determined that fraud exists, the worker must take the necessary case actions at the earliest time possible, provided the timely notice requirement is met for denial, reduction, or termination of benefits to which the applicant/recipient is not entitled.
8	Applicant/ Recipient Rebuts the Findings	Should the applicant/recipient present additional information and/or verifications to rebut the investigator's findings, the information/verifications must be reviewed for consistencies. The worker is to inform the PAFD investigator of additional information and/or verification received. Generally, a sworn statement will not be considered acceptable to rebut the investigator's findings. The decision to accept a sworn statement without other verifications must be made at the FRC Manager/Assistant Manager level. All information must be thoroughly documented by the worker in the Case Comments.
9	Questions Regarding Investigation Findings	If the worker has questions regarding the investigator's response, the worker will discuss the issues with his/her supervisor and the investigator.
10	Response to PAFD	The WWKR screen on FRATS is used to respond to the PAFD report and indicate disposition of or action taken on the case and the dollar savings. A printout of the response is automatically printed for PAFD when the WWKR screen is completed.

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I. Referral Information

The table below shows the information that must be forwarded to PAFD to support the referral.

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Referral Information (continued)

Referral Regarding	Indicate	Documentation & Attachments
Residency	<ul style="list-style-type: none"> • Why residency is suspected and what actions have been taken to resolve it. • Source of information. • Prior residence information. • All children's names, Dates of Birth, and SSNs. 	<ul style="list-style-type: none"> • Copy of applicant's/recipient's ID. • Rent receipt, rental agreement (with landlord's name, address, and telephone number). • Utility receipt. • Affidavit of living situation. • Vehicle information.
Unreported Income	<ul style="list-style-type: none"> • Why the applicant/recipient is suspected of having unreported income and what actions have been taken. • Source of the alleged income. • Name and place of employment. • Name and SSN under which the applicant/recipient is/was employed. • Name of person having contact over employment (boss, employer, etc.). • Method used for commuting to and from work. 	<ul style="list-style-type: none"> • Copy of applicant's/recipient's ID. • Past employment history. • Copies of any pay stubs or employment verifications.
Unreported Property	<ul style="list-style-type: none"> • Why the applicant/recipient is suspected and what actions have been taken. • Source of the allegation. • Type of property involved. 	<ul style="list-style-type: none"> • Copy of applicant's/recipient's ID. • Statement of Facts. • Copies of documents showing ownership of the property.
Needs Exceed Income	<ul style="list-style-type: none"> • Reason for suspicion and actions taken. • How long the situation has been going on. 	<ul style="list-style-type: none"> • Copy of applicant's/recipient's ID. • Copy of rental agreement. • Copy of utility receipt. • Affidavit of living situation. • Sworn statement (client's explanation as to how needs are being met).

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**J.
Referral
Returns from
PAFD**

The table below shows the common reasons for referral returns and the actions that can be taken to prevent returns.

Reasons for Return	Description	Prevention Measures
Required Attachments not Sent	The referral indicates “yes” for attachments but attachments have not been received by PAFD within required time frames.	Always send out the necessary attachments immediately after the referral is made.
Required Actions not Taken before a Referral Is Made	Information not compared to case record, no contact with the applicant/recipient trying to resolve any discrepancy, and documenting the actions taken as well as the findings on the referral.	Upon receipt of the allegation, the worker needs to identify if the information is known to the case. If the information is not known, contact the applicant/recipient and question him/her about it. Document the responses and findings from the applicant/recipient in the case record, and include this additional information in the referral if a referral is still necessary.
Duplicate Referral on the Same Case	Worker transmits a new/ additional allegation or information to PAFD by creating a new referral while a referral is previously been made and accepted by PAFD	Prior to transmitting a referral to PAFD, the worker needs to check the case record to determine if there is a referral pending result of an investigation on the same case. If yes, the new/additional information should be communicated to PAFD by entering it in the “Additional Comments” section on the WREF-3 screen, using the existing tracking number.

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Referral Returns from PAFD (continued)

Reasons for Return	Description	Prevention Measures
Insufficient Information	The referral does not clearly identify what the allegation is or the allegation does not appear to have any impact on the eligibility or benefit level.	The specifics of the allegation must be included in the referral and only those allegations that may impact eligibility or benefit level are to be referred to PAFD. For instance, an allegation of unreported income on a currently closed case should indicate the period of the alleged fraud. Any change in an applicant's/recipient's income, property, or household composition, etc. after his/her case is closed is no longer a concern to the case and a fraud referral should not be made.
Referral Should be Made to Early Fraud, not Full Field	Referral was sent to Full Field Investigations on a case that was: <ul style="list-style-type: none"> • opened less than 90 days; • applications for new funds; or • GR cases. 	Compare the case status to the EFD/P referral criteria in G , above, to determine if the referral should be an EFD/P or Full Field referral.
Improper Referrals	Referral was made on allegation of drug use, child abuse, to request a DMV clearance, etc.	Only allegations that appear to have a direct impact on the applicant's/recipient's eligibility for GR or benefit level and which have not been resolved should be referred to PAFD. Other allegations shall be referred to the appropriate authority.