Program Integrity and Prevention of Improper Benefit Issuance

Washington State Department of Social and Health Services
Economic Services Administration • Division of Program Integrity

Economic Services Administration

Approximately one in four Washington residents rely on assistance such as cash grants, food, child support, disability determination and supports for transition to employment among other services administered by the Department of Social and Health Services' Economic Services Administration (ESA). As we pursue our shared mission of reducing poverty 50% by 2025, a strong program integrity effort is vital for the public to have trust and confidence that ESA programs, policies and processes work together to achieve accurate results for the people we serve. By collaborating with internal and external stakeholders, we improve our processes, identify gaps and balance program integrity risks with timely and equitable recipient access to benefits. ESA's Division of Program Integrity (DPI) provides statistically valid data-based feedback to the administration for decision-making to improve policy and process, and action as appropriate.

What are the key ways we provide integrity assurance?

FNS Fraud Framework Grant – In 2020, DPI received a grant award from the Food & Nutrition Services (FNS) to test fraud-prevention efforts by leveraging data in a more in-depth and targeted manner. This grant allowed us to stand up an infrastructure of dashboards for reporting on suspicious benefit usage activity. The cost savings achieved from the project are being leveraged to create an ongoing Integrity Assurance business unit to continue this valuable work with contemporary data reporting for our partners.

Electronic Benefit Transfer (EBT) card usage monitoring – DPI staff monitor numerous reports related to EBT card usage patterns that raise red flags or fit a fact pattern of suspicious usage that may be improper. Trend data is analyzed by the Integrity Assurance business unit to provide information to our partner divisions; for example to the Community Services Division for policy or process improvements and/or to the DSHS Office of Fraud and Accountability (OFA) for a fraud investigation or process review.

Quality Assurance (QA) – Quality Assurance teams in DPI utilize numerous online and real-time data matching interfaces to conduct statistically valid sampling-based case reviews on food and cash cases (specifically, work verification requirements review for cash). QA has rigorous processes and standards in place for conducting these reviews to ensure programs are issuing benefits correctly and providing data-based feedback on relevant areas for improvement and case correction when applicable. The Management Evaluation team conducts larger sample-sized case reviews as well as site visits on a three-year cycle to ensure program access, quality/accuracy, and procedural compliance in benefit issuance. These results are also published on a real-time dashboard for the business to utilize.
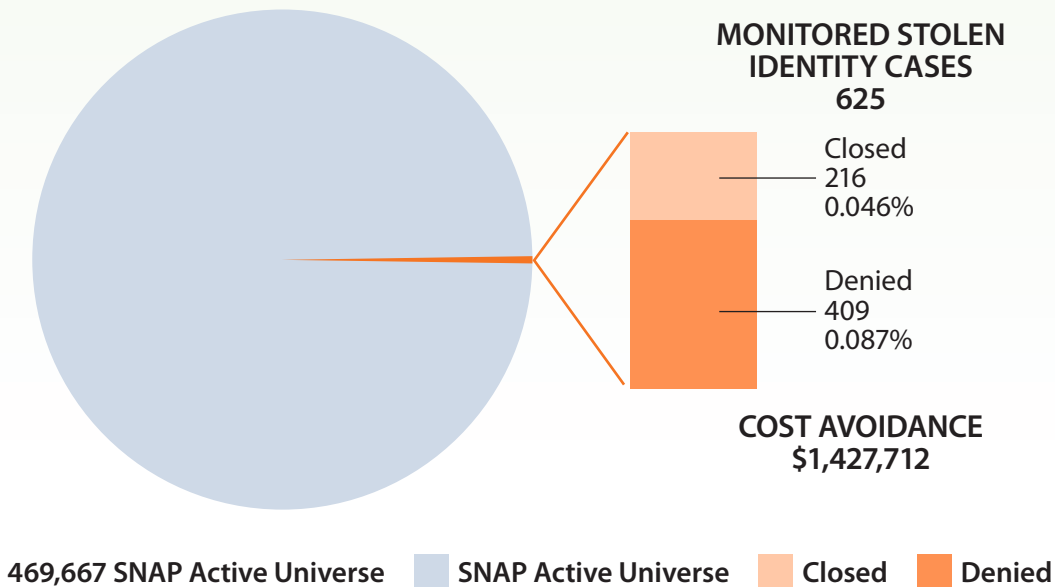
Fraud Early Detection – DPI staff working program reviews, out of state match cases, or trend reports may identify potential or suspected fraud and make a case referral to the Office of Fraud and Accountability for investigation. We partner with OFA to ensure smooth referrals and exchange of information.

Interstate data sharing – When an electronic interstate match indicates a recipient has received benefits in more than one state, we collaborate with staff in the other state to verify residency and other pertinent case details. This may result in establishment of benefit overpayments or further investigation referrals to OFA.

Basic Food Program Disqualification – We address Intentional Program Violations (IPV) that may result in the client being barred from receiving program benefits during a penalty period. DPI staff pursue administrative hearings based disqualifications from an Administrative Law Judge when appropriate. Our division's efforts account for about 45% of the IPV disqualifications applied in DSHS.

Integrity Assurance - anomaly detection and analysis – The main driver in applying for FNS' Fraud Framework Grant was the events that occurred at Employment Security Division during COVID-19. DPI assessed the internal controls for similar situations transpiring in public assistance programs and determined the need to bolster the existing infrastructure. The Integrity Assurance team was hired through the awarded grant along with acquiring technical resources. Below is one early outcome achieved from April 2021 – August 2022 while systems were still being built. This success is only the beginning as the dashboards evolves and efforts are applied to other public assistance programs.

Supplemental Nutrition Assistance Program (SNAP) Fraud
Framework Grant Outcomes
Monitored Stolen Identities

MONITORED STOLEN
IDENTITY CASES
625

Closed
216
0.046%

Denied
409
0.087%

COST AVOIDANCE
$1,427,712

469,667 SNAP Active Universe ■ SNAP Active Universe ■ Closed ■ Denied

Washington State
**Department of Social
& Health Services**

Transforming lives

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