

**Operations Memorandum
Cash
Medicaid
SNAP
OPS100404**

April 27, 2010

SUBJECT: Office of Inspector General Field Investigations
TO: Executive Directors
FROM: Joanne Glover, Director, Bureau of Operations

Purpose

To introduce changes related to the procedures to request Office of Inspector General (OIG) field investigation for the Supplemental Nutrition Assistance Program (SNAP), Medical Assistance, Cash Assistance and other programs. This memorandum is effective immediately upon posting.

Background/Discussion

Recent legislation (Act 54 of 2009) allows all employees of a County Assistance Office (CAO) to make a [field investigation referral](#) directly to OIG when the CAO staff member has reason to question the completeness, validity, or accuracy of statements or documentation provided. No CAO staff member may be subject to any negative action due to the submission of a field investigation. Additionally, when fraud is suspected, CAO staff may refer an applicant or recipient for any public assistance program, including LIHEAP. The exception to this is that no referrals should be made for:

- Expedited SNAP; or
- Cases involving domestic violence.

Before making a referral to OIG for a field investigation, the CAO must attempt to thoroughly verify information that is inadequate, incomplete, questionable and/or inconsistent with known facts. Refer to the following Handbook sections for instructions on the verification process:

- CAH Sections 178.2-178.5 and 178.7;
- Medical Assistance Eligibility Handbook Sections 378.2- 378.5 and 378.7;
- SNAP Handbook Sections 578.2-578.6 and 578.8.

The CAO will tell the client that additional evidence is required to clear up questionable information. Together, the CAO and client will determine acceptable sources of additional evidence. If the evidence provided by the client is still unacceptable, the CAO will check with collateral sources of information using a copy of the PA 4, Authorization for Release of Information form, when required. A collateral contact is a source of information that is knowledgeable about the client's situation and serves to support or corroborate information provided by the client. Communication with a collateral contact may be made in person, over the telephone or by mail.

Possible collateral contacts include:

- Past or present landlords;
- Employers;
- School officials;
- Neighbors;
- Clergy;
- Day care providers;
- Other persons outside the household.

In instances where additional information is needed, questions remain concerning eligibility, or suspicions remain prior to the authorization of benefits or before an overpayment referral is complete and submitted (for recipients), the CAO should make a referral to OIG for a field investigation. Referrals can be made on applicants and active recipients. The reasons for making a referral can include, but are not limited to:

- Questionable state or county of an individual's residence.
- Questionable location of an absent parent.
- Unreported or under reported income, particularly where expenses significantly exceed income.
- Reports or other information received alleging ineligibility or suspected fraud and the CAO is unable to verify their accuracy without investigatory help.

The process to complete a referral is included in the updated OIG Field Investigation and Referral Process.

Field investigations do not affect the normal overpayment referral process or the OIG's investigation into referrals selected for possible prosecution. Evaluating a case for prosecution occurs after a field investigation shows evidence of fraud or an intentional program violation.

Next Steps

1. This Operations Memorandum replaces OPS040308.
2. Share this information with appropriate staff.
3. Direct any questions to your Area Manager.
4. This Operation Memorandum will become obsolete when the information is incorporated into all handbooks

Attachment – [2010 Field Investigation and Referral Process](#)