

DHS CHILD CARE ASSISTANCE PROGRAM (CCAP)

PROVIDER INVESTIGATIONS CONTINUOUS IMPROVEMENT PROJECT

ABOUT THE CCAP PROGRAM

Helps low-income families pay for child care so parents can pursue employment or education, and children are well cared for and prepared for school

State supervised and administered by Counties and Tribes

DHS and local agencies investigate fraud. DHS focuses primarily on providers; local agencies typically investigate recipients



CI PROJECT GOALS

Improve the integrity and oversight of the Child Care Assistance Program (CCAP)



Improve proactive technical support and prevent potential program violations

CI PROJECT APPROACH

Collaborate with and leverage the knowledge, skills and creativity of a cross-functional team

Base decisions on data and facts

Utilize proven continuous improvement methods and tools



WHERE WE WERE **2019** → **2020** WHERE WE ARE

INVESTIGATIVE FOCUS

- Limited use of DHS authority to address policy violations
- Non-compliant providers continued to receive payments until case resolution

- Expanded use of administrative sanctions
- Stop payments to non-compliant providers quickly

INVESTIGATIVE PROCESS

- No consistent process for screening and prioritizing work

- Documented processes consistently used to screen and prioritize work

CASE TRACKING & MANAGEMENT

- No single source of information on investigations

- Case tracking system with reliable data used for decision making and investigative process

TEAMWORK & COLLABORATION

- Limited coordination between DHS business areas
- Confusing and labor intensive manual overpayment calculations

- Investigation process and outcomes guided by a cross-functional team
- A new methodology making overpayment calculations easier and more transparent

CCAP PROGRAM INTEGRITY: IMPACT OF 2019 LEGISLATIVE CHANGES

LEGISLATION PASSED IN 2019

DHS IMPLEMENTATION PROGRESS

RECORD-KEEPING REQUIREMENTS

- Enhanced recordkeeping requirements for CCAP providers
- Clarified absent and holiday billing requirements
- Uniform method for calculating attendance record overpayments



- Created a methodology and tool for overpayment calculation
- Piloting overpayment tool with select counties
- Conducted record reviews on 46 providers (more than 100,000 records)

ADMINISTRATIVE SANCTIONS

- Increased penalties for intentional program violations; clarified DHS authority to impose provider sanctions
- Disqualification period increased to three years for first offense and permanent thereafter
- Changed burden of proof to preponderance of the evidence in administrative hearings for disqualification (consistent with other programs)

- Expanded use of administrative sanctions for non compliance
- Issuing disqualification notices to non-compliant providers
- CCAP registration closed or terminated non-compliant providers



PROVIDER OVERSIGHT

- Funded enhanced monitoring of newly licensed and struggling child care centers
- Funded staff to research and plan improvements to provider registration and electronic attendance record keeping
- Required license holders to disclose changes in business ownership structures



- Ten new staff hired for newly created cross-divisional "Early and Often" compliance team
- Researching electronic attendance systems and engaging stakeholders about changes to provider controls and registration
- Developed process for license holders to submit ownership change information

LAW ENFORCEMENT COLLABORATION

- Funded two additional MN BCA special agents to conduct criminal investigations
- Clarified allowable data sharing with law enforcement and other agencies

- Contract addendum drafted and under review by MN BCA
- Criminal investigations are currently pending with MN BCA



DATA ANALYTICS

- Funded additional data analysts across OIG
- Funded a case tracking system for fraud investigations



- Additional data analysts hired across OIG
- Data-mining reports are being developed
- Developed interim case tracking system
- Request for Proposal (RFP) for long term case system in progress