



STATE OF OHIO
OFFICE OF THE AUDITOR

JIM PETRO, AUDITOR OF STATE

Preventing Welfare Fraud

*Preventing Overpayments to Public Assistance Recipients
Employed by the Public Sector and Validating Social
Security Numbers of Public Assistance Recipients*

An Operational Review by the:

**Fraud, Waste, and Abuse
Prevention Division**



STATE OF OHIO
OFFICE OF THE AUDITOR

JIM PETRO, AUDITOR OF STATE

88 East Broad Street
P.O. Box 1140
Columbus, Ohio 43216-1140

Telephone 614-466-4514
800-282-0370

Facsimile 614-466-4490

December 1, 1998

Mr. Wayne Sholes, Director
Ohio Department of Human Services
30 East Broad Street
Columbus, Ohio 43266-0423

Dear Director Sholes:

I am pleased to provide you with our report entitled "Preventing Overpayments to Assistance Recipients Employed by the Public Sector and Validating Social Security Numbers of Public Assistance Recipients." Our review had two objectives: (1) to identify individuals who were receiving public assistance and failed to report income earned as employees of the public sector, and (2) to identify persons on public assistance rolls with invalid social security numbers. The latter is important because social security numbers are frequently used to detect such things as unreported income. The report identifies \$85,000 in Food Stamp and Ohio Works First overpayments made to 207 recipients employed by the public sector, and \$191,000 in overpayments made to deceased recipients. It also contains recommendations intended to reduce the risk of future overpayments.

Copies of this report are being sent to the members of the General Assembly, County Directors of Human Services, and other interested parties. If you or your staff have any questions concerning the report or would like to discuss its contents, please call John Butts, Chief of our Fraud, Waste, and Abuse Prevention Division, at (614) 728-7142.

Yours truly,

A handwritten signature in black ink, appearing to read "Jim Petro", written over a large, stylized flourish.

JIM PETRO
Auditor of State

EXECUTIVE SUMMARY

In Fiscal Year 1998, the State of Ohio and the federal government paid about \$7.2 billion to Ohioans in support of the Ohio Works First (OWF), Food Stamp, and Medicaid programs. Given the magnitude of these outlays and the program changes brought about by welfare reform, the Auditor of State is concerned that appropriate controls are in place to ensure that program funds are not lost to fraud, waste or abuse.

This report addresses two issues: (1) whether public assistance recipients who were employed by the public sector had accurately and timely reported their income, and (2) the extent that persons on public assistance rolls may have invalid social security numbers (SSNs). The latter is important because having a person on the rolls with an invalid SSN defeats the purpose of fraud controls, which often rely on SSN matches to detect such things as unreported income. Both issues were previously addressed in reports issued by the AOS in September 1997.¹

County Departments of Human Services (CDHSs) investigated 815 recipients who were receiving public assistance benefits and receiving income as public employees. They reported the following:

- 608 individuals (75 percent) had properly reported the income.*
- 207 individuals (25 percent) had not timely or accurately reported the income. As a result, these individuals had been overpaid at least \$85,000 in OWF and Food Stamp benefits. In addition, the public assistance cases of at least 17 individuals were or will be closed, representing a future monthly savings of \$5,164.*

AOS staff also identified problems in the timeliness with which CDHS Benefit Recovery Units followed through on cases where the amount of overpayment was unknown and needed additional research. Out of 45 overpayment cases received by 8 CDHSs in March 1998, Benefit Recovery Units had identified an overpayment amount in only one case as of August 7, 1998.

CDHS investigations of 3,143 potentially invalid SSNs showed:

- 1,709 SSNs (54 percent) belonged to deceased recipients whose assistance cases had been*

¹*Preventing Overpayments to Public Assistance Recipients Employed by the Public Section, AOS/FWAP-98-01R; and Validating Social Security Numbers of Public Assistance Recipients, AOS/FWAP-98-02R*

terminated by the CDHS's, although some of the terminations were not timely;

- *801 SSNs (26 percent) had been incorrectly transcribed by CDHS case workers;*
- *548 SSNs (17 percent) were not incorrect;*
- *60 SSNs (2 percent) were not documented in the recipients' case file and required additional investigation; and*
- *25 SSNs (1 percent) were incorrect for various other reasons.*

Fewer data transcription errors were identified during this review than in the AOS' 1997 review – a positive trend. However, payments made to recipients after they were deceased continues to be a problem. CDHSs identified about \$191,000 in OWF, Food Stamp and Medicaid overpayments – most of which were Medicaid payments made to nursing homes.

In light of the above results, the AOS is making the following recommendations to ODHS.

- *ODHS should obtain on-line access, through data exchange, of contributors to the various State of Ohio public retirement systems. This would give case workers access to employment data that would permit them to make correct benefit determinations at the time of application or recertification.*
- *ODHS should develop the capability to verify SSNs as they are entered, or soon after they are entered into CRIS-E. This could be done by gaining on-line access to Social Security Administration files or through use of a commercially available computer software package.*
- *ODHS should review the functioning of CDHS benefit recovery units to determine what opportunities exist to speed overpayment recoveries.*
- *Working with the appropriate CDHSs, ODHS should recover the overpayments identified during this review.*

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ABBREVIATIONS

AOS	Auditor of State
CDHS	County Department of Human Services
CRIS-E	Client Registry Information System - Enhanced
IEVS	Income and Eligibility Verification System
ODHS	Ohio Department of Human Services
OWF	Ohio Works First

BACKGROUND

In Fiscal Year 1998, the state of Ohio and the federal government paid over \$7.2 billion in public assistance benefits to Ohioans in the support of Ohio Works First (OWF), Food Stamp, and Medicaid programs. No one knows the total amount of public assistance dollars that are obtained fraudulently or issued in error. However, between October 1996 and September 1997, ODHS estimates that 10.7 percent of all Food Stamp dollars were issued because of recipient or administrative errors. When this error rate is applied to state fiscal year 1998 (July 1997 to June 1998) Food Stamp issuances, about \$69 million in Food Stamps were issued in error. Given the magnitude of these outlays and the program changes brought about by welfare reform, the Auditor of State is concerned that appropriate measures be taken to ensure that program funds are not lost to fraud, waste or abuse.

Section 5101:1-2-05(L) of the Ohio Administrative Code (OAC) requires that applicants for and recipients of public assistance make accurate, full and complete disclosure of the facts necessary to determine their eligibility and the correct amount of benefits due them. This disclosure includes reporting within 10 days any changes in income that might result from employment.

To ensure recipients receive the correct amount of benefits, federal regulations mandate that state agencies administering federally funded public assistance programs operate an Income and Eligibility Verification System (IEVS). To meet this requirement, ODHS obtains income and benefit information from the Ohio Bureau of Employment Services, the Social Security Administration, and Internal Revenue Service. The information received is incorporated into the IEVS and other Client Registry Information System-Enhanced (CRIS-E) data exchange components and provided to county caseworkers in the form of computerized "alerts". When recipients under report their income, either intentionally or unintentionally, caseworkers rely on the alerts to determine whether an overpayment has occurred and whether an adjustment to the recipients' benefits is warranted.

Sections 5101:1-39-091, 5101:4-3-22 and 5101:1-3-09 of the OAC require that applicants for and recipients of Medicaid, Food Stamps, and Ohio Works First provide SSNs in order to be eligible for benefits. Section 5101:1-3-09(A) of the OAC and Section 3130 of ODHS' Public Assistance Manual contain guidance on the procedures to be followed when confirming the SSN of a public assistance applicant. A photocopy of a recipient's social security card is to be kept in the CDHS case record. The Public Assistance Manual also requires that case workers enter the SSN into CRIS-E. Recipients are informed, by way of their rights and responsibilities, that the CDHSs will use the SSN to contact appropriate persons or agencies to determine their eligibility and to verify information the applicants provide such as income, past or present employment, financial resources, unemployment compensation, and disability benefits. For the verification process to be effective, it is imperative that CRIS-E contain a person's correct SSN.

In a September 1997 report, the AOS reported on the results of a retirement system match that covered public sector income earned during 1996. As part of the match, CDHSs investigated 1,640 recipients and identified 532 public assistance recipients who had not timely or accurately reported income earned as a public employee, including 245 recipients whose unreported income was previously unknown to the CDHS. The 245 recipients had been overpaid nearly \$229,000 in ADC and Food Stamp overpayments, and the cases of 49 of these recipients were closed, representing a monthly savings of nearly \$17,000. Our report recommended that ODHS (1) obtain on-line access to retirement systems data so that employment information could be verified before benefits are issued and (2) develop audit checks to ensure CDHS compliance with requirements to process IEVS information.

A second AOS report issued in September 1997 reviewed the validity of SSNs on public assistance rolls as of December 31, 1996. Out of 1,206,882 SSNs, we identified 84,214 (7 percent) questionable and potentially invalid numbers. Due to the volume of hits, we decided to defer 77,949 SSNs that could have been issued since the date of the software we used. Various filters were then applied to focus on those SSNs that had the greatest potential to be invalid. The end result was 2,427 SSNs that were sent to the CDHS's for investigation. Of these, the CDHSs completed and reported on 1,887 of the questionable SSNs which showed that 1,043 SSNs (55 percent) had been incorrectly transcribed by workers at the CDHS and 396 SSNs (18 percent) belonged to deceased recipients whose assistance cases had been terminated by the CDHS, although some of the terminations were not timely. The latter resulted in benefits paid several months after the date of death. Our report recommended that ODHS (1) develop the capability to verify SSNs before benefits are issued, (2) install an edit check that requires double entry of SSNs by caseworkers, (3) develop checks to ensure cases contain proper verifications and that all information is used in making case determinations, and (4) reinforce guidance to case workers not to use social security claim numbers, which may reflect the SSN of a spouse.

PURPOSE, SCOPE AND METHODOLOGY

determine the extent that persons on public assistance rolls may have invalid social security numbers (SSNs). The reviews were conducted in cooperation with ODHS and the CDHSs.

RETIREMENT SYSTEM MATCH

To determine whether public assistance recipients currently receiving benefits were also employed by the public sector, public assistance recipients as of December 31, 1997 were matched against

individuals contributing to, or receiving benefits from, four State of Ohio Public Retirement Systems². The match was conducted pursuant to Ohio Revised Code Sections 5101.181 (B) and (D).

The match identified 12,591 recipients, including 7,583 current contributors and 5,008 retirees. Because of the volume of potential hits, various filters were applied to minimize the number of “false hits” sent the CDHSs for investigation and to focus on those matches that had the potential for higher overpayments. The end result was 863 matches that were sent to the CDHSs for investigation, along with a data collection instrument to record the results. The distribution of hits by county is shown in Appendix I. We also spot checked the extent that CDHS Benefit Recovery Units acted on requests to pursue instances of identified overpayments.

SOCIAL SECURITY NUMBER VALIDATION

To determine the extent that persons on public assistance roles may have invalid SSNs, AOS staff matched the SSNs of persons on public assistance rolls as of December 31, 1997, against a commercially available software package. The persons included in the match were receiving OWF, Food Stamp, and/or Medicaid benefits. The software assigned different error codes to potentially invalid or questionable SSNs. For example, a questionable SSN was one that fell within a range of numbers that the Social Security Administration had reserved for future issue, but had not issued as of the date of the software. Other error codes indicated, for example, that a SSN belonged to a deceased person, or that a SSN contained numbers not used by the Social Security Administration.

Of 1,080,601 SSNs included in the match, we identified 68,489 (6 percent) questionable and potentially invalid numbers, including 65,180 numbers that the Social Security Administration had reserved for future use. Because of the volume of hits, we decided to filter out the 65,180 SSNs that could have been issued since the date of the software and focus on those SSNs that had the greatest potential to be invalid. The end result was 3,309 SSNs were sent to the CDHS’s for further investigation, along with a data collection instrument to record the results. The distribution of potentially invalid SSNs by county is shown in Appendix I.

Following receipt of data collection instruments from the CDHS, we spot checked responses from the counties to verify that corrections had been made and the effect of the corrections. In those instances where the CDHS’s indicated that the SSN was correct but the recipient was deceased, we accessed the CRIS-E record to ensure that the recipient’s benefits had been terminated. We also determined from eight metro counties the amount of overpayment and the elapsed time between the

² The Public Employees Retirement System, the State Teachers Retirement System, the School Employees Retirement System, and the Police and Firemen’s Disability and Pension Fund.

recipient's date of death and the date benefits were terminated.

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The work was performed at ODHS headquarters in Columbus, Ohio; offices of the retirement systems; and various CDHS's from December 1997 through August 1998 in accordance with generally accepted government auditing standards.

RESULTS

Public assistance recipients are expected to fully and timely (within 10 days) disclose all changes that would affect their eligibility or the amount of assistance they receive. For those who do not timely or accurately report, ODHS relies on the counties to use IEVS data or information received from other data exchanges to assist in making correct benefit determinations. When the recipients' SSNs are not correct in CRIS-E, IEVS and other SSN-based matches become ineffective.

UNREPORTED INCOME CAUSED AT LEAST \$85,000 IN OVERPAYMENTS

Through August 31, 1998, CDHSs had returned 815 (94 percent) of the 863 cases they received. From these cases, CDHSs identified 207 public assistance recipients (25 percent) who did not timely or accurately report income they had earned as a result of being employed by a state, county, city, or school entity. Of the 207 cases of improperly reported income, the CDHSs stated that they were aware of 126 cases. Case workers had learned of the unreported income through CRIS-E employment screens or through IVES alerts. The remaining 81 cases of unreported income discovered through this match were not known to the case workers. CDHSs can collect at least \$85,000 in ADC and Food Stamp overpayments as a result of the AOS match and save about \$5,100 monthly from 17 closed public assistance cases.

Following are examples of some of the overpayments that were identified as a result of the AOS match:

- Recipient A was a village employee who reported "volunteering" at the village without pay but in actuality was paid income. During the employment period, the employee received OWF and Food Stamp benefits. Because this income was not reported, the recipient was overpaid about \$2,740.
- Recipient B was a state university employee. Case records contained no information concerning this employment. The recipient was overpaid about \$1,173 in OWF benefits.

- Recipient C was a state employee. The CDHS had knowledge of earlier employments through various matches on CRIS-E, but not in this instance. During this employment period, the employee received OWF and Food Stamps benefits. Because this income was not reported, the CDHS identified an overpayment of about \$3,789 in OWF benefits, and was in the process of determining the amount of Food Stamp overpayments.
- Recipient D was a state university employee. The CDHS had no knowledge of this employment. During this employment, the employee received OWF and Food Stamp benefits. Because this income was not reported, the recipient was overpaid about \$3,734 in OWF benefits and \$3,080 in Food Stamps.

CDHS Benefit Recovery Units Did Not Act Timely on Overpayment Cases

In 78 of the 207 cases (38%) in which the recipient improperly reported income and the CDHS identified the case as having been overpaid, the CDHS listed “unknown” or left blank the amount of that overpayment. In accordance with standard CDHS procedures, most of these cases were forwarded to each CDHS’s Benefit Recovery Unit for calculation and recovery of the amount owed. Seventeen (17) of the 78 cases occurred in six counties and the remaining 61 were from Cuyahoga County. On August 7, 1998, AOS staff reviewed the Benefit Recovery screens in CRIS-E on 48 of the 78 cases. All 17 cases from the six counties were reviewed, as were 31 of the 61 cases from Cuyahoga County. An overpayment amount had been identified on only one case, indicating that little or no action had been taken to pursue the overpayments several months after the occurrence of an overpayment had been identified.

MOST INVALID SSNs BELONGED TO DECEASED RECIPIENTS

In March 1998, 3,309 potentially invalid SSNs were sent to CDHSs for investigation. As of August 31, 1998, CDHSs reported the following results for 3,143 investigated numbers.

Table 1: Results of CDHS Investigations of Potentially Invalid SSNS

Investigative Result	Number of SSNs	Percent of Total
SSN belonged to deceased recipient	1,709	54%
SSN was incorrectly transcribed by CDHS caseworker	801	26%
SSN was not invalid	548	17%
SSN was not documented in the recipients' case files and required additional investigation	60	2%
SSN was invalid for various other reasons	25	1%
Total SSNs investigated	3,143	100%

Untimely Closure of Deceased Recipients' Cases Caused \$191,000 in Overpayments

Of the 3,143 SSNs investigated by the CDHSs, 54 percent (1,709 cases) belonged to deceased recipients whose assistance cases had been terminated by the CDHSs, although some of the terminations were not timely. In 54 cases, the delay in closing the cases (which averaged 4½ months and ranged up to 14 months after the date of death) resulted in the overpayment of about \$191,000 in OWF, Food Stamp, and Medicaid benefits. Most of the overpayments (\$188,445), including \$150,802 in Cuyahoga County, were Medicaid overpayments. Most of the Medicaid overpayments had been made to nursing homes where the recipient resided. None of the Medicaid overpayments had been recovered when we checked ODHS' Medicaid Management Information System in June 1998.

We reported similar results in our September 1997 report and again in a December 1997 report on Ohio Nursing Homes.³ In our September report, we stated that one reason for the delays in closing the cases appeared to be a delay on the part of the nursing homes to notify the CDHSs that a patient was deceased. Another reason for the delays in closing cases appeared to be a failure on the part of the CDHSs to act on information once notified that a recipient was deceased. In response to our December report, ODHS stated that it was working to make long term care facilities (nursing homes) more accountable for making timely and accurate changes to its census (the list of residents reported

³Ohio Nursing Homes: Policy and Procedural Changes Can Reduce Costs and Increase Provider Accountability, AOS/FWAP-98-05R, December 1997.

to ODHS). ODHS also acknowledged that the complexity of funneling changes through 88 CDHSs required ongoing efforts to improve performance. ODHS stated it had hired an external source to recover overpaid Medicaid funds.

Fewer Transcription Errors Found

In September 1997, the AOS reported that about 56 percent (1,210) of the 2,164 questionable SSNs investigated by CDHSs were invalid because caseworkers had incorrectly transcribed the numbers into CRIS-E. Our review of numbers in public assistance files as of December 31, 1997 indicated incorrect transcriptions were less of a problem. CDHSs reported that 801 (26 percent of the total questionable numbers) had been incorrectly transcribed.

One reason for finding fewer transcription errors during this review was likely due to the correction of longstanding errors in 1997. However, increased management attention to the problem may have also helped avoid new errors. Our September 1997 report had recommended that ODHS and CDHSs adopt controls to reduce the number of transcription errors. In response to a questionnaire sent to CDHS Directors regarding the implementation of our recommendations, most said that new controls had been put into place. As of July 1, 1998, 54 completed questionnaires had been returned. The questions and responses were as follows:

1. Has ODHS or your CDHS developed audit checks and supervisory reviews to ensure case workers take appropriate action on all employment information and to ensure that SSNs are properly documented in the case files?
Yes: 52 No: 1 Other: 1
2. Has ODHS or your CDHS developed the capability to verify SSNs as they are entered or soon after they are entered into CRIS-E?
Yes: 28 No: 25 Other: 1
3. Has ODHS built edits into CRIS-E that would require case workers to enter a SSN twice when processing applications or reapplications?
Yes: 2 No: 51 Other: 1
4. Has ODHS offered any guidance to your CDHS in regards to SSN validation or employment information?
Yes: 37 No: 13 Other: 4

Different Persons Sometimes Used the Same SSN

In the course of matching records of retirement system contributors with records of public assistance

recipients, 51 instances were identified where two individuals were using the same SSN. Since most cross checks and verifications are based on SSN matches, a person identified by an incorrect SSN (SSNs are assigned to one person only) is able to avoid most fraud controls, such as the checks on unreported income. Correspondingly, the person who is unknowingly "sharing" his SSN with another person may at some point be subject to inquiries about apparent discrepancies in earned benefits. To determine which party was using the correct number, the list of duplicate users was sent to the retirement systems and the appropriate CDHS for verification and correction. Investigation of these duplicate users was still underway as of August 31, 1998.

CONCLUSIONS

Fraud, waste, and abuse are problems faced by all public agencies. ODHS, as the agency administering the largest expenditures in Ohio's budget, needs to ensure benefits are issued only to eligible recipients.

This was the second year this review was performed, and we noted some improvements and several concerns. This year's review identified fewer overpayments due to unreported public sector income than the previous year's review. However, a new concern emerged -- CDHS Benefit Recovery Units in seven counties were slow to follow up on overpayments identified by the review. In the case of SSN validations, fewer invalid numbers were caused by transcription errors, perhaps due in part to increased management attention to this problem. On the other hand, the payment of public assistance benefits (most of which was Medicaid payments) to deceased persons months after the date of death continues to be a problem. We identified \$191,000 in OWF, Food Stamp and Medicaid benefits that had been paid after the date of death.

RECOMMENDATIONS

The following recommendations to ODHS are aimed at resolving some of the problems identified in this review.

The first two recommendations were also made in our September 1997 reports, but have yet to be implemented by ODHS. The last two recommendations are new recommendations based on additional work done during this review. Implementing these recommendations should help ensure the proper functioning of controls aimed at preventing and detecting erroneous benefit determinations.

- To reduce the number and amount of overpayments resulting from improperly reporting public employment income, ODHS should obtain on-line access, through data exchange, of all contributors to the various State of Ohio public retirement systems. This would give case workers access to employment data that would permit them to make correct benefit determinations at the time of application or redetermination.
- To reduce the number of invalid and incorrectly transcribed SSNs, ODHS should develop the capability to verify SSNs as they are entered, or soon after they are entered into CRIS-E.

This could be done by gaining on-line access to Social Security Administration files or through use of a commercially available computer software package.

- In light of apparent delays in the recovery of overpayments by CDHSs, ODHS should review the functioning of CDHS benefit recovery units to determine what opportunities exist to speed up overpayment recoveries.
- Working with the appropriate CDHSs, ODHS should recover the overpayments identified during this review. These overpayments include (1) the \$85,000 in OWF and Food Stamp overpayments identified by CDHSs that was due to unreported or delayed reporting of public sector income; (2) the \$191,000 in Medicaid, OWF, and Food Stamp overpayments made on behalf of deceased recipients, and (3) any additional overpayments identified by CDHS benefit recovery units after further review of cases sent to them for investigation.

AGENCY COMMENTS

To provide an opportunity for comment, a draft of this report was sent to the Director of ODHS on September 24, 1998. ODHS' response, dated October 5, 1998, stated the following.

- ODHS' Bureau of Program Integrity was currently researching the feasibility of various data matches, including obtaining on-line access to Ohio public retirement system information and developing the capability to verify SSNs as they are entered into CRIS-E. It will adopt matches found fiscally justifiable.
- The Bureau of Program Integrity was taking several steps to speed overpayment recoveries, including the implementation of suggestions made at a recent with fraud investigators and supervisors, and revision of the process for reviewing overpayment claims at each CDHS in order to identify problems and trends.
- The Department agreed to recover overpayments identified during the review. A detailed listing of the overpayments to be recovered was provided to ODHS under separate cover on November 9, 1998.

See pages 14 and 15 for ODHS' full response.

APPENDIX I

Distribution of Retirement System and SSN Matches by County

	COUNTY	RET SYS	SSN	TOTAL		COUNTY	RET SYS	SSN	TOTAL
1	Adams	3	5	8	45	Licking	12	47	59
2	Allen	4	10	14	46	Logan	0	8	8
3	Ashland	1	7	8	47	Lorain	14	59	73
4	Ashtabula	14	22	36	48	Lucas	41	124	165
5	Athens	7	19	26	49	Madison	0	6	6
6	Auglaize	0	8	8	50	Mahoning	26	106	132
7	Belmont	6	36	42	51	Marion	0	6	6
8	Brown	0	10	10	52	Medina	5	20	25
9	Butler	6	58	64	53	Meigs	5	10	15
10	Carroll	1	3	4	54	Mercer	1	14	15
11	Champaign	1	12	13	55	Miami	0	17	17
12	Clark	6	52	58	56	Monroe	1	6	7
13	Clermont	7	60	67	57	Montgomery	69	110	179
14	Clinton	0	5	5	58	Morgan	1	2	3
15	Columbiana	4	25	29	59	Morrow	1	8	9
16	Coshocton	0	3	3	60	Muskingum	3	23	26
17	Crawford	2	9	11	61	Noble	0	1	1
18	Cuyahoga	318	835	1153	62	Ottawa	1	2	3
19	Darke	1	9	10	63	Paulding	0	1	1
20	Defiance	0	8	8	64	Perry	5	12	17
21	Delaware	2	6	8	65	Pickaway	3	7	10
22	Erie	3	17	20	66	Pike	2	10	12
23	Fairfield	1	22	23	67	Portage	20	18	38
24	Fayette	0	10	10	68	Preble	2	4	6
25	Franklin	62	367	429	69	Putnam	0	10	10
26	Fulton	0	6	6	70	Richland	12	39	51
27	Gallia	2	8	10	71	Ross	8	10	18
28	Geauga	1	8	9	72	Sandusky	2	11	13
29	Greene	4	23	27	73	Scioto	11	28	39
30	Guernsey	2	5	7	74	Seneca	0	7	7
31	Hamilton	36	272	308	75	Shelby	1	5	6
32	Hancock	2	16	18	76	Stark	28	143	171
33	Hardin	0	3	3	77	Summit	27	180	207
34	Harrison	3	4	7	78	Trumbull	30	55	85
35	Henry	0	3	3	79	Tuscarawas	0	9	9
36	Highland	1	11	12	80	Union	0	1	1
37	Hocking	0	7	7	81	Van Wert	1	3	4
38	Holmes	0	11	11	82	Vinton	1	2	3
39	Huron	0	1	1	83	Warren	3	23	26
40	Jackson	1	10	11	84	Washington	0	16	16
41	Jefferson	8	24	32	85	Wayne	3	13	16
42	Knox	4	15	19	86	Williams	0	7	7
43	Lake	1	34	35	87	Wood	4	14	18
44	Lawrence	6	31	37	88	Wyandot	0	2	2

Retirement System Total: 863
SSN Total: 3309



Ohio Department of Human Services

30 East Broad Street, Columbus, Ohio 43266-0423

October 5, 1998

Mr. Jim Petro
Auditor of State
88 East Broad Street
P.O. Box 1140
Columbus, Ohio 43216-1140

Dear Mr. Petro:

Attached is the Ohio Department of Human Services' response to the report entitled "Preventing Overpayments to Public Assistance Recipients Employed by the Public Sector and Validating Social Security Numbers of Public Assistance Recipients." The response was prepared by the Fraud Control Unit within the Office of Program Integrity.

If you or your staff would like to discuss the contents of this response, please contact me at (614) 728-5693 or Hal Whitehurst at (614) 728-5694.

Yours truly,

A handwritten signature in black ink that reads "David McGuckin".

David McGuckin, Chief
Bureau of Internal Audits

OHIO
the heart of it all!

An Equal Opportunity Employer

AOS recommendations:

- **Obtain on-line access to Ohio public retirement systems information for matching against public assistance rolls.**
- **Develop the capability to verify each SSN as it is entered into CRIS-E.**

The ODHS Bureau of Program Integrity (BPI) is researching the feasibility of these and other data matches. If these activities are found to be fiscally justifiable, we will write a Customer Service Request (CSR) for implementation. Currently, Y2K, SETS, ICMS, SACWIS, and numerous fixes to the current CRIS-E BV system are large projects competing for MIS resources.

- **Speed overpayment recoveries**

The BPI Fraud Control Section recently held the first annual statewide meeting of fraud investigators and supervisors. We asked 180 participants how we might assist them in the prevention, detection, and prosecution of fraud, and the establishment and collection of claims. We came away with 174 excellent ideas, such as numerous BV fixes, data matches, credit report access, mandatory wage withholding, and state offset programs. We are researching and will implement as many initiatives as are feasible and practical.

We also have recently revised our process for review of claims at each CDHS, in order to identify problems and trends in the areas of establishment and collection.

Additional CRIS-E reports of BV activities are planned.

- **Recover the overpayments identified during the review.**

We will. Please provide a list of the overpayments to be recovered.



An Equal Opportunity Employer



STATE OF OHIO
OFFICE OF THE AUDITOR

JIM PETRO, AUDITOR OF STATE

35 East Gay Street
Columbus, Ohio 43215

Telephone 614-466-3340
800-282-0370

Facsimile 614-728-7398

PREVENTING WELFARE FRAUD STATEWIDE

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

By: _____
Clerk of the Bureau

Date: _____ **DEC 08 1998** _____