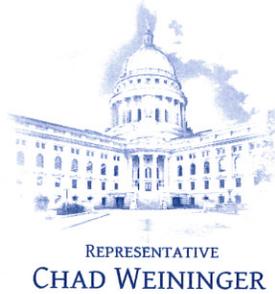


December 17, 2013

Testimony on AB 232



Thank you, Mr. Chairman, for holding a hearing on AB 232, the Counties Fraud Incentive Bill. I would also like to thank the members of the Committee for being here today, and for their thoughtful consideration of this bill.

Simply, AB 232 creates an incentive for counties to become more engaged in joining in the fight against waste, fraud, and abuse to ensure that dollars set aside for public assistance go to those most in need. Under current law, Counties are provided a small fixed amount to fund fighting fraud, and an additional percentage of the amount recovered.

Right now, those incentives do not entice counties to go after fraud, and many counties don't prioritize fighting fraud because it often expends more general levy dollars than counties are able to recoup from the state or federal government.

An example of this can be seen in Brown County, which during 2012 uncovered \$593,214 in fraud, but that only resulted in a recoupment of \$82,291 for Brown County, while the County's expenses were \$193,210. Basically, Brown County taxpayers were paying the state and federal government more than \$100,000 for fraud they uncovered.

AB 232 creates another option for counties to receive funds to fight Medical Assistance and Food Share fraud. The bill requires DHS to establish a program and seek a waiver to allow counties to receive up to 20% of the amount that would have been saved over 12 months. The theory is those dollars that are uncovered by local law enforcement, would have never been uncovered if the additional resources were not deployed by the county.

Had this legislation been active during 2012 when Brown County uncovered the \$593,214 in fraud, it would have received \$264,734, rather than only \$82,291. \$264,734 is enough for the County to fund two Sheriff's Deputies with support staff and another Assistant District Attorney at no cost to local taxpayers.

This proposal would require a federal waiver, one that I am hopeful that the federal government will grant if they are serious about fighting fraud to safeguard dollars that are intended to go to those most in need. In addition, I am drafting an amendment that would make this a revenue enhancer for DHS by allowing them to retain the total amount recovered.

I commend DHS for reorganizing and becoming better equipped to stamp out fraud, however, top down/big government, isn't as effective as the local law enforcement officers working with neighbors and front line employees as we have seen in Brown County. Brown County officials are here to testify in favor of this bill.

Now is the time for the Legislature to act if we are serious about fighting fraud. I hope you will join those in support of the bill to fight fraud, so counties will have an increased incentive to ensure that there are not dishonest individuals defrauding the state of public assistance dollars meant for our most needy Wisconsinites.

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P.O. Box 8952
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TO: Members of the Assembly Committee on Urban and Local Affairs
FROM: Representative André Jacque
DATE: December 17, 2013
RE: Assembly Bill 232

Chairman Brooks and Members of the Committee on Urban and Local Affairs:

Thank you for this hearing and the opportunity to address you in support of Assembly Bill 232, which I have had the pleasure of co-authoring, along with Representative Weininger. This legislation is the natural outgrowth of the basic, common sense idea that if counties or other local government entities allocate resources to identify fraud in state and federal programs, they should share in the savings of state and federal tax dollars that results.

We have worked on a bi-partisan basis with a variety of county officials, several of whom are here to testify today, to come up with an incentive program that works to sustain the efforts and success that Brown County has already seen with its fraud prevention efforts, and encourage other areas of the state to follow suit. It simply makes sense to have fraud detection efforts coordinate as directly as possible, at the closest level of government, with those charged with actually administering the program and who are most aware of how program benefits may be being abused. In particular, Brown County's use of sworn law enforcement officers to investigate fraud within the Foodshare/SNAP and other public assistance programs has seen great success in saving taxpayer dollars at other levels, and has been pursued as good public policy. Unfortunately, the county has not been fairly reimbursed for the costs of investigation and prosecution, jeopardizing the ability of Brown County to sustain its efforts without a substantial cost to county taxpayers.

AB 232 provides to an entity which discovers it, 20% of the overpayment of public program dollars that would have otherwise occurred over the next 12 months had the fraudulent activity not been uncovered. This reflects both a reasonable reimbursement of approximate costs incurred and reflects the reality that while substantial recoveries cannot always be made at the time fraud has been discovered and prosecuted, very real future savings will be realized from what would otherwise be unmitigated, essentially perpetual fraud. As you can see in the attached Milwaukee Journal Sentinel article from earlier this year, the fraud uncovered in public programs represents only the tip of the iceberg of what actually exists. And a single local investigation, as you will hear shortly with the example of Beach Road Liquor in Green Bay, can net hundreds of instances of individual misuse of public funds. It is essential that rigorous fraud detection be promoted and undertaken to safeguard program and funding integrity for both the sustainability of programs for their participants and the reassurance of taxpayers. While state government must certainly play a part in these efforts, there are practical limitations to our effectiveness if we are the primary investigative entity. We need to seek and support partnerships - this legislation will clearly fulfill that objective.

Thank you for your consideration and support.



Investigations prevent millions in fraudulent overpayments for FoodShare, Medicaid

By Jason Stein of the Journal Sentinel
March 15, 2013

Madison - The state, counties and private investigators last year identified or avoided more than \$14.5 million in fraudulent overpayments for taxpayers within two large state programs for the needy and are on track to find similar amounts this year, new figures show.

Using everything from a fraud hotline to database checks and private investigators, authorities are finding fraud in state food stamp and health care programs and more than covering the cost of looking for it. It's a reversal in both approach and outcome from several years ago, when the state cut all its funding for fraud prevention because of budget troubles.

Some of the saving will go to the federal or county governments, but the money that the state will get to keep out of the total savings should easily top the roughly \$1.3 million spent by the state in identifying it.

"It'll more than pay for itself . . . Our job is to weed out the greedy so we can help the needy," said Alan White, inspector general at the state Department of Health Services.

The fraud detected is only a small amount of the state programs. But with spending on those programs running into the billions of dollars, even a small percentage of abuse can add up to big totals.

As one part of its larger efforts, the state is now targeting some of the problem areas highlighted in past stories by the Journal Sentinel. In 2011, the newspaper reported on Milwaukee residents who were openly buying or selling FoodShare benefits on social media sites such as Facebook in violation of the law. In more evidence of potential fraud, the Journal Sentinel also found in 2011 that nearly 2,000 FoodShare recipients reported losing their Quest cards - similar to debit cards and used by participants to purchase food - six or more times in the previous year.

Now, the state is monitoring social media sites for signs of fraud and sending out 1,700 letters to recipients with frequently lost cards to warn them that they cannot sell the card for cash and then later report it stolen.

In 2012, the state identified \$6 million in improper overpayments to FoodShare and Medicaid recipients and an additional \$8.5 million that would have gone to these recipients in future payments within six months of the fraud being detected.

A big chunk of the improper payments were found in Milwaukee County, where much of the investigating was handled by the private firm of Ed O'Brien, a former Chicago police officer and longtime private investigator of public benefits fraud. O'Brien's firm also does that work for 54 other counties and four tribal governments, and one question going forward is whether O'Brien will continue

to have a role in Milwaukee.

For years, budget cuts had led the state to cut funding for fraud investigations even as public benefits programs such as FoodShare and Medicaid swelled and hard economic times gave program participants a greater incentive to bend the rules. Spending by the state to detect fraud dropped to almost nothing, and the cases of fraud detected plummeted along with that.

Gov. Scott Walker's administration has restored some of the funding, and so far that spending appears to be paying off with savings greater than the costs.

In just one example, O'Brien said that program officials had his firm check about 50 people in Milwaukee County who claimed to be homeless. In fact, half or more of those people weren't homeless - they were living with someone else who may have added extra household income beyond the amount that the program recipient reported.

"They had an unusually high number of people claiming to be homeless," O'Brien said. "We found that the majority of them were not homeless."

Authorities also looked at:

- Complaints made to a hotline (877-865-3432) and Internet portal for reporting fraud that were begun last year. The state receives about 200 complaints a month, with about half of them turning up problems and the number of complaints not dropping off so far, White said.

"We're a little surprised at the volume," White said.

- People who were spending FoodShare benefits at grocery stores and other retailers outside Wisconsin, a practice that is allowed but can be a red flag. The vast majority of those cases turned out to be people who were living in other states while improperly receiving benefits through the Wisconsin program, O'Brien said.

- Jail and prison inmates who don't qualify for the FoodShare benefits that they're receiving. Matching the names of inmates against those of FoodShare recipients turned up a number of cases of improper benefits.

- Cases where a federal database shows that people receiving benefits through Wisconsin programs are also getting them from other states, as well. The state is using more database matching to catch fraud, such as better verification of the income being reported by applicants against income records being kept for Wisconsin's unemployment insurance system.

"We've got a good way to go," White said.

Robert Kraig, executive director of the advocacy group Citizen Action of Wisconsin, said that it was important to weed out abuse in the programs. But he said he also worried that some measures to cut down on a relatively small fraud could end up creating unneeded hurdles for people with legitimate needs.

"It's really about striking a balance," Kraig said.

Benefits in the FoodShare program are paid by the federal government, and those in Medicaid programs

are paid jointly by the state and federal government. But even though not all of the saving in these programs goes back to state taxpayers, identifying overpayments can still make sense financially for the state.

For instance, when the state uses means such as payroll deductions to collect overpayments made to recipients in those program as a result of fraud, the federal government lets the state keep up to 25% of the overpayments and any county partner involved to keep 15%.

O'Brien's firm looked at 744 cases last year in Milwaukee and other counties around Wisconsin, and in some cases found overpayments to recipients that went back many months or even years. The review focused on FoodShare and Medicaid health coverage, but some of the scammers discovered had also received a total of more than \$150,000 in improper benefits from the state's child care subsidy program and Wisconsin Works, the successor to welfare sometimes known as W-2.

The year's worth of investigations by O'Brien helped turn up more than half of the saving and overpayments and cost the state \$456,000, not including work done by state and local employees. But the state is not renewing O'Brien's contract to look into cases in Milwaukee County, where nearly \$2 million of those overpayments and savings were found at a cost of about \$136,000.

O'Brien said that he's proposing to the state that they spend more money to check the applicants for those programs in areas such as Milwaukee and better verify up front that they do in fact qualify for the benefits. He said there were 1,000 to 2,000 such applications each month in Milwaukee County alone.

"If our proven program was implemented, the savings would be in the millions again this year . . . ," O'Brien said.

But White said that the state is now getting staff training and operating in Milwaukee County, the only county in Wisconsin where enrollment and fraud detection are handled directly by the state. State officials believe that this fraud work can be done as well by public employees, he said.

Find this article at:

<http://www.jsonline.com/news/statepolitics/investigations-identify-prevent-millions-of-dollars-in-overpayments-for-state-programs-li948hu-198515281.html>

Check the box to include the list of links referenced in the article.



State of Wisconsin
Department of Health Services

Scott Walker, Governor
Kitty Rhoades, Secretary

December 17, 2013

Assembly Committee on Urban and Local Affairs

2013 AB 232 relating to: an optional incentive program for counties and tribes that identify fraudulent activity in certain public assistance programs, granting rule-making authority, and making appropriations

WI Department of Health Services position: testifying for information only

Under current law, the state shares FoodShare fraud and error collections with the counties. The Department of Health Services (DHS) share of the collected monies pays for collection efforts performed by the Department of Children and Families, and helps fund anti-fraud efforts in the DHS Office of the Inspector General. DHS also provides the county consortia with \$500,000 AF/\$250,000 GPR for fraud and client error reduction under the Fraud Prevention and Investigation Program (FPIP). As these fraud detection efforts have become more successful, the counties have received a 35% increase in overpayment collections between 2011 and 2012. This trend of increasing overpayment collections to the state and counties is expected to continue.

AB 232 proposes to change the amount of incentive payments that counties can collect in cases of FoodShare recipient fraud and error that they identify (see Attachment 1). Under AB 232, the counties would be entitled to the total state share of recipient fraud and error collections under the FoodShare program; the state share of the collections would be zero. This would decrease DHS's ability to pay for fraud staff and collections efforts and require the department to replace the lost PR with GPR in the amount of \$154,100.

AB 232 also directs DHS to create an optional incentive program for counties. Under this program, the counties would receive an incentive of 20% of the estimated 12 month savings to Medicaid or FoodShare programs that would result from elimination of the fraudulent activity. Whereas the current collection program is based on specifically identified overpayments, the proposed optional incentive program is based on a projected overpayment that will never be made. Since this program would eliminate the incentive for counties to establish overpayments due to recipient error, collections in that area may decrease.

This program would require DHS to request two federal waivers, one from the Centers for Medicare and Medicaid Services for the Medicaid program and one from the Food and Nutrition Service. Additionally, there is the potential for counties to curb or delay their fraud identification activities until they can be rewarded under the proposed optional incentive program.

However, if the federal agencies did grant the waivers, the estimated annual cost of the payments would be \$1.2M GPR, \$552,000 PR, and \$1.7M FED (\$3.4M AF) based on CY 2012 data. The new GPR would be necessary because the federal government funds Medicaid and FoodShare administrative costs at a 50% match rate with state GPR. Eliminating FoodShare fraud does not result in state savings because FoodShare benefits are 100% funded by the federal government. Finally, it is difficult to estimate Medicaid savings because AB 232 directs payments to be made from the Medicaid administrative appropriation, not the benefits appropriation.

Current (top) incentive payments and incentive payments under AB 232

FoodShare Overpayment Collections			
	Federal Share	DHS Share	County/Tribal Share
Client Error	80%	5%	15%
Fraud	65%	20%	15%
Non-Client Error	100%	0%	0%

Wisconsin Medicaid and BadgerCare Plus Overpayment Collections			
	Federal Share	DHS Share	County/Tribal Share
Client Error	60%	25%	15%
Fraud	60%	25%	15%
Non-Client Error	Cannot recover non-client error overpayments for MA		

FoodShare Overpayment Collections			
	Federal Share	DHS Share	County/Tribal Share
Client Error	80%	0%	20%
Fraud	65%	0%	35%
Non-Client Error	100%	0%	0%

Wisconsin Medicaid and BadgerCare Plus Overpayment Collections			
	Federal Share	DHS Share	County/Tribal Share
Client Error	60%	25%	15%
Fraud	60%	25%	15%
Non-Client Error	Cannot recover non-client error overpayments for MA		



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Governor Scott Walker
Secretary Eloise Anderson
Secretary's Office

MEMORANDUM

Date: December 17, 2013
To: Members of the Assembly Urban and Local Affairs Committee
From: Sara Buschman, Assistant Deputy Secretary
Re: Department Position on 2013 AB 232 – For Information Only

Thank you for the opportunity to submit information on AB 232. The Department of Children and Families (DCF) commends the efforts of Representative Weininger and Senator Cowles to reduce fraud in our programs. It is vital that DCF has the proper tools to preserve the integrity of programs that serve Wisconsin's children, youth, and their families.

Currently, DCF provides fraud incentives through the delivery structure for Wisconsin Works (W-2), Wisconsin Shares, and other existing programs. The Department has strengthened internal fraud prevention efforts through contractor audits and client record data matches. In addition to these efforts, the Legislature also provided DCF with more fraud prevention staff and additional tools over the past two sessions to expand and enhance state oversight of public assistance programs. As stewards of taxpayer dollars, the Department appreciates the tools the Legislature has given us to carry out program integrity activities.

AB 232 contains provisions to establish optional incentive programs for counties and tribes for the DHS-administered Medical Assistance (MA) and FoodShare (FS) programs, as well as the Wisconsin Works Program, which is administered by the Department of Children and Families. Also, under the definition of Wisconsin Works used in AB 232, this bill will cover the Wisconsin Shares program.

The Department offers the following comments on AB 232:

- The program structure outlined in AB 232 would have fit better under the previous program-delivery model. Under current state law, a W-2 agency may be a county, non-profit agency, or for-profit agency. In January 2013, DCF entered into new W-2 contracts. For these 4 year contracts, with up to 4 2-year renewal periods (for potentially 12 years before a new RFP), there are no county contractors. As a result, since counties are not in the foreseeable future the primary contractors for W-2, this decreases the likelihood that county or tribal employees will be focusing on W-2 fraud.

- Of DCF's programs, counties and tribes administer only Wisconsin Shares child care contracts outside of Milwaukee County. In the Wisconsin Shares child care subsidy program, DCF is in the process of establishing through administrative rule an optional incentive program, similar to one anticipated in AB 232, for counties and tribal governing bodies that investigate fraud, as authorized under s. 49.197(2).
- Current law allows a county or tribe to receive 15% of AFDC benefits that are recovered due to the efforts of an employee or officer of the county or tribe. Since the state is the one making collections on AFDC overpayments, when an AFDC payment is collected by the state for a recoverable claim established by a county or tribe, DCF sends the local unit its 15%, rather than the other way around (the county "retaining" 15% and sending DCF money). In addition to current practice differing from the provisions in the bill, the percentage returned is different. Having two different collection practices and amounts may cause confusion with counties and tribes.
- It will be difficult to determine prospective savings in W-2 as a result of eliminating the fraudulent activity, since it is speculative as to how long a person may have been on W-2, what placement they may be, etc. It is easier to calculate an incentive based on amounts recovered or paid. Additionally, the issue arises as to how to assign the county or tribal governing body's share of responsibility and therefore reward amount when several entities, such as DCF, W-2 agencies, law enforcement, income-maintenance agencies and DHS, may also be involved in identifying the same instance of fraud.
- It is important to note that "current law" for these programs also includes federal law, and there are important distinctions between the programs. Generally, the MA, FS, and AFDC programs allowed for separate federal and state shares of recovered funds, and the state, through policy and statute, elected to use some of the state share to fund incentive programs. The federal programs are generally structured so that state or local costs for fraud investigation are eligible for federal reimbursement. Programs providing that an arbitrary percentage of collections may be used "for any purpose," as provided under this bill, must be funded by state funds, such as the state share of collections. In contrast, the W-2 and Child Care block grant fund recoveries are treated as 100% federal TANF funds and reinvested in the TANF programs. While options exist to treat them differently, they are administratively complex.

The bill provides that "A county or tribe may use a reward payment received under this section for any purpose." The term "section" is overly broad because, while it may be workable for DHS programs, it is problematic for the DCF programs covered by the same new statutory section—and inconsistent with the provision providing counties and tribes the option of choosing an incentive under s.49.197 (2) rather than a payment calculated under the bill provisions. Section 49.197 (2) and the pending administrative rule do not allow such incentives to be used "for any purpose." Rather they require the funds to be reinvested in child care fraud investigation or other TANF programs, to ensure compliance with federal law and guidance for block-grant funds.

- Another component of AB 232 requires DCF to request a federal waiver from the Department of Health and Human Services, if needed, to allow reward payments to be counted as TANF MOE. The Department may not implement the bill provisions unless the waiver is granted. While the success of the waiver may depend on what restrictions DCF places on the use of funds in the rulemaking process, AB 232 provides that a county

or tribe may use the funds received for any purpose, limiting the Department's ability to restrict uses to federally approvable purposes and contract structures. Although DCF cannot pre-judge the DHHS decision on a waiver request, DHHS generally cannot grant waivers that contradict federal statutory requirements.

In conclusion, the DCF components in AB 232 would create provisions that are somewhat duplicative with existing programs and revised program structures. As a result, it may be more effective to modify the bill to focus solely on DHS programs. If the authors and the committee wish to maintain DCF programs in the bill, we would be happy to work with the authors on suggested changes to clarify the bill as it pertains to Wisconsin Works and Wisconsin Shares.

If the committee has any questions, please feel free to contact me for additional information. Thank you for the opportunity to provide feedback on this legislation.

MEMORANDUM

TO: Honorable Members of the Assembly Committee on Urban and Local Affairs

FROM: Sarah Diedrick-Kasdorf, Deputy Director of Government Affairs 

DATE: December 17, 2013

SUBJECT: Support for Assembly Bill 232

The Wisconsin Counties Association (WCA) supports Assembly Bill 232, which creates an optional incentive program for counties and tribes that identify fraudulent activity in certain public assistance programs.

Counties, through the income maintenance consortia, play an important role in the administration of the state's public assistance programs. The state requires income maintenance consortia to perform initial eligibility determinations for the FoodShare, Medical Assistance, BadgerCare, and Child Care programs, and to ensure individuals continue to meet eligibility requirements at specified intervals. With the implementation of the Affordable Care Act in Wisconsin, income maintenance consortia are expecting significant increases in their caseloads.

State funding to counties for fraud prevention and investigation activities is extremely limited. The Department of Health Services, through its Fraud Prevention and Investigation Program (FPIP), for example, allocates \$500,000 (all funds) to support fraud prevention activities in 71 counties and several tribes throughout the state (see attached). According to FPIP guidelines, the program emphasizes fraud prevention over fraud detection, administrative sanctions over criminal adjudication, and cost neutrality such that total administrative costs do not exceed total program savings as measured by future savings, claims established and sanctions. In the Medicaid and FoodShare programs, counties receive incentive payments of 15% of the collections for client error and fraud.

Under the bill, the county and tribal share for FoodShare fraud collections increases to the full federal amount of 35% and client error to 20%. This would increase funding to counties by over \$150,000 annually. Also under the bill, the incentive amounts for Medicaid and FoodShare fraud identification would be based on a 12-month savings

WCA Memo
December 17, 2013
Page 2

estimate (20% of the estimated 12-month savings to Medical Assistance and/or FoodShare programs that would result from the elimination of the fraudulent activity).

Wisconsin's counties have raised concerns in the past about "fragmented, inadequate and inconsistent" funding for both front-end verification (FEV) and fraud investigations. In 2010, the Legislative Council Special Committee on Public Assistance Program Integrity also discussed increased funding and training for county income maintenance agencies. Counties have limited local funds available to allocate to fraud prevention / investigation activities.

The inclusion of fraud detection and prevention services in public assistance programs lends credibility to the programs and assures taxpayers that funding paid to assist families in need is allocated appropriately and utilized for its intended purposes. The Wisconsin Counties Association thanks Rep. Weininger for recognizing the valuable role county income maintenance agencies play in fraud detection and prevention and is pleased to lend its support to Assembly Bill 232.

Thank you for considering our comments.

DHS FRAUD PREVENTION INVESTIGATION ALLOCATIONS FOR CY 2014

AGENCY	UNDUPLICATED CASELOAD*	PERCENT OF TOTAL	TOTAL FUNDING
ADAMS COUNTY	2,682	0.620%	3,098
ASHLAND COUNTY	2,475	0.572%	2,859
BARRON COUNTY	6,055	1.398%	6,992
BAYFIELD COUNTY	1,411	0.326%	1,630
BROWN COUNTY	21,837	5.044%	25,219
BUFFALO COUNTY	1,144	0.264%	1,321
BURNETT COUNTY	1,869	0.432%	2,159
CALUMET COUNTY	2,639	0.610%	3,048
CHIPPEWA COUNTY	6,456	1.491%	7,457
CLARK COUNTY	3,407	0.787%	3,934
COLUMBIA COUNTY	4,902	1.132%	5,661
CRAWFORD COUNTY	1,765	0.408%	2,038
DANE COUNTY	38,251	8.835%	44,177
DODGE COUNTY	7,179	1.658%	8,292
DOOR COUNTY	2,677	0.618%	3,092
DOUGLAS COUNTY	5,647	1.304%	6,521
DUNN COUNTY	4,403	1.017%	5,085
EAU CLAIRE COUNTY	11,520	2.661%	13,304
FLORENCE COUNTY	543	0.125%	627
FOND DU LAC COUNTY	8,602	1.987%	9,935
FOREST COUNTY	1,118	0.258%	1,291
GRANT COUNTY	4,598	1.062%	5,310
GREEN COUNTY	3,419	0.790%	3,948
GREEN LAKE COUNTY	1,687	0.390%	1,948
IOWA COUNTY	2,004	0.463%	2,315
IRON COUNTY	923	0.213%	1,066
JACKSON COUNTY	2,157	0.498%	2,491
JEFFERSON COUNTY	7,089	1.637%	8,187
JUNEAU COUNTY	3,098	0.716%	3,578
KENOSHA COUNTY	19,139	4.421%	22,104
KEWAUNEE COUNTY	1,541	0.356%	1,780
LA CROSSE COUNTY	12,102	2.795%	13,977
LAFAYETTE COUNTY	1,504	0.347%	1,737
LANGLADE COUNTY	2,986	0.690%	3,449
LINCOLN COUNTY	3,250	0.751%	3,753
MANITOWOC COUNTY	7,159	1.654%	8,268
MARATHON COUNTY	13,212	3.052%	15,259
MARINETTE COUNTY	5,001	1.155%	5,775
MARQUETTE COUNTY	1,698	0.392%	1,961
MONROE COUNTY	4,460	1.030%	5,151
OCONTO COUNTY	3,449	0.797%	3,984
ONEIDA COUNTY	4,154	0.959%	4,797
OUTAGAMIE COUNTY	12,605	2.912%	14,558
OZAUKEE COUNTY	4,076	0.941%	4,707
PEPIN COUNTY	715	0.165%	826
PIERCE COUNTY	2,648	0.612%	3,058
POLK COUNTY	4,442	1.026%	5,130
PORTAGE COUNTY	6,398	1.478%	7,389
PRICE COUNTY	1,993	0.460%	2,302
RACINE COUNTY	22,827	5.273%	26,363
RICHLAND COUNTY	2,125	0.491%	2,454

DHS FRAUD PREVENTION INVESTIGATION ALLOCATIONS FOR CY 2014			
AGENCY	UNDUPLICATED CASELOAD*	PERCENT OF TOTAL	TOTAL FUNDING
ROCK COUNTY	20,065	4.635%	23,173
RUSK COUNTY	2,112	0.488%	2,439
ST. CROIX COUNTY	5,145	1.188%	5,942
SAUK COUNTY	6,165	1.424%	7,120
SAWYER COUNTY	2,505	0.579%	2,893
SHAWANO COUNTY	3,932	0.908%	4,541
SHEBOYGAN COUNTY	10,190	2.354%	11,768
TAYLOR COUNTY	2,121	0.490%	2,449
TREMPEALEAU COUNTY	2,822	0.652%	3,259
VERNON COUNTY	2,733	0.631%	3,157
VILAS COUNTY	1,976	0.456%	2,282
WALWORTH COUNTY	9,647	2.228%	11,141
WASHBURN COUNTY	2,227	0.514%	2,571
WASHINGTON COUNTY	7,728	1.785%	8,925
WAUKESHA COUNTY	18,576	4.291%	21,454
WAUPACA COUNTY	5,424	1.253%	6,264
WAUSHARA COUNTY	2,380	0.550%	2,749
WINNEBAGO COUNTY	14,755	3.408%	17,040
WOOD COUNTY	9,481	2.190%	10,949
MENOMINEE TRIBE	889	0.205%	1,027
RED CLIFF TRIBE	350	0.081%	404
STOCKBRIDGE-MUNSEE TRIBE	136	0.031%	157
POTAWATOMI TRIBE	34	0.008%	39
LAC DU FLAMBEAU TRIBE	841	0.194%	971
LAC COURTES OREILLES TRIBE	34	0.008%	39
BAD RIVER TRIBE	343	0.079%	396
SOKAOGON TRIBE	149	0.034%	172
ONEIDA TRIBAL COUNCIL	1,137	0.263%	1,313
Total Unduplicated cases	432,938	100.000%	500,000

*Based on the average of November 2012 - May 2013 IM Caseload Data