



**CHILDCARE AND PARENT SERVICES (CAPS)
Georgia's Subsidy Program**

CAPS Procedure – Managing Program Integrity	No.: CAPS/01-8	Effective Date: 10/01/2016
		Revised: 10/01/2019
		Revision Effective: 10/01/2019

LEGAL AUTHORITY: Federal Register: 45 Code of Federal Regulation (CFR) 98 and 99

Cross Reference/See Also: CAPS Parent Rights and Responsibilities Policy (CAPS/00-3), CAPS Application Process Policy (CAPS/00-4), CAPS Child Care Provider Rights and Responsibilities Policy (CAPS/00-12), CAPS Program Integrity Policy (CAPS/00-16), CAPS Administrative Hearings Policy (CAPS/00-18)

Note: Definitions of words or phrases in **bold** are located in [Definitions and Acronyms](#). Only the first occurrence of the defined words or phrases are bolded.

8 MANAGING PROGRAM INTEGRITY

8.1 Purpose

The purpose of this document is to define the procedures to be followed by CAPS staff related to ensuring program integrity. CAPS staff must ensure that eligibility is determined correctly for families receiving **Childcare and Parent Services (CAPS)** subsidies. This is the first step in the prevention of improper payments. As the first line of contact for families, CAPS staff are vital in the prevention, detection, and reporting of activities that appear to be in violation of CAPS policy and **Child Care and Development Fund (CCDF)** regulations to ensure program integrity and the utilization of funds to families for which the program is intended to serve.

Note: This procedures document must be used in conjunction with CAPS policies and may not include all applicable state and federal laws, regulations, and policies. All parties who wish to receive subsidies through CAPS and any party responsible for the administration of the CAPS program are responsible for ensuring that they are compliant with all state and federal laws and regulations, including those found in the Code of Federal Regulations (CFR § 98) and policies that govern this program.

8.2 Scope

This procedure applies to all employees of the **Department of Early Care and Learning (DECAL)**, all parties responsible for the administration of the CAPS program; as well as, **parents** and child care **providers** who receive subsidies administered by DECAL, on behalf of **parents**.

8.3 Types of Improper Payments

There are four types of errors which lead to improper payments: **administrative error (AE)**, **client error (CE)**, **provider error (PE)**, and **program violation (PV)**.

- Administrative errors (AE) are a result of an agency discrepancy where eligibility was determined incorrectly. In cases where the improper payment is completely based on an AE, the agency will not seek recoupment.
- Client errors (CE) are a result of the **parent's** unintentional submission or omission of documentation/verification that led to inaccurate determination of eligibility resulting in an improper payment. CEs may be pursued for recoupment.
- Provider errors (PE) are a result of the child care provider's unintentional submission or omission of documentation/verification that led to incorrect payment issuance resulting in an improper payment. PEs may be pursued for recoupment.

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- Program violations (PV) are the result of an intentional act by the **parent** or child care provider to misrepresent/mislead by providing false documentation/verification or intentionally omitting documentation/verification in an effort to be determined **eligible** for services or payment. PVs may be considered **fraud** if established by a court of jurisdiction and DECAL may pursue any and all legal or equitable remedies available to the CAPS program in accordance with applicable state and federal laws or regulations to collect **overpayments** in full from **parents** and child care providers.

8.4 Maintaining Program Integrity

It is the responsibility of every CAPS staff member to minimize the opportunity for improper payments by performing their duties as outlined in CAPS policies and procedures. It is essential that staff fully understand these policies and procedures. Staff must make sure that **applications** and supporting documents (used to verify the information in the application) have been fully completed, properly signed, and dated. Any conflicting or missing information must be brought to the attention of the **parent** or child care **provider** for clarification or completion. Thoroughly reviewing the **case record** and documents that verify the information in the case record prior to issuing a scholarship will aid CAPS in reducing errors and preventing misrepresentation.

CAPS staff will review the **parent’s** rights and responsibilities during the interview for initial enrollment and for each subsequent **eligibility period**, ensure the **parent** fully understands their rights and responsibilities as subsidy program participants, and document confirmation in the case activity log. The **parent’s** rights can be found in the [CAPS Parental Rights and Responsibilities Policy \(CAPS/00-3\)](#).

The **parent** provides information on the child care application as well as supporting documentation. Although the **parent** is the primary source of information and is fully responsible for it, verification of the information and documentation provided is sometimes necessary. Staff should verify questionable or inconsistent information when reviewing the child care application and supporting documentation. The signature page of the child care application gives CAPS the authority to investigate discrepancies. Internal methods of verification that may be used by CAPS staff include, but are not limited to: the Work Number (<https://www.theworknumber.com/>), Georgia Department of Labor **wage** and benefit information, available eligibility systems, or direct contact with the listed employer. Refer to the verification section of the [CAPS Application Process Policy \(CAPS/00-4\)](#) for additional information.

If there are inconsistencies in the verification submitted by the **parent** and the employer, educational institution, or internal methods of verification, the CAPS staff should take the following steps:

Step	CAPS Staff Action
1	Contact the employer or educational institution to verify what was received.
2	Contact the parent to determine if additional documentation is needed to support documentation. (A) If documentation/verification continues to be inconsistent and eligibility cannot be verified, deny application for eligibility. (B) If documentation/verification can be confirmed, continue to process eligibility.
3	File all document and record all actions taken in the case record.

CAPS should ensure that child care providers fully understand their rights and responsibilities as subsidy program participants and this should be documented in the provider profile. Rights and responsibilities for child care providers are included throughout the CAPS policy and are listed in the [CAPS Child Care Provider Rights and Responsibilities Policy \(CAPS/00-12\)](#). It is the responsibility of the **State Provider Management Agent (SPMA)** to ensure that the provider understands and complies with the Provider Agreement as well as **sanctions** associated with non-compliance.

Program integrity also includes instances where intentional program violations are committed by CAPS staff or contractor staff. Every effort will be made to identify, detect, report, and take action against any individual found to have committed intentional violations against the CAPS program, up to and including, investigation, termination, and prosecution.

As prescribed in the Code of Ethics for Executive Branch Officers and Employees, all CAPS staff must make every effort to avoid even the appearance of a conflict of interest. An appearance of conflict exists when a reasonable person would conclude

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from the circumstance that the employee’s ability to perform their job responsibilities is compromised by personal interests. An appearance of conflict could exist even in the absence of a true conflict.

To avoid the appearance of conflicts of interest, CAPS staff must recuse themselves from any proceeding in which the employee’s impartiality might reasonably be questioned. If CAPS staff determine that they should recuse themselves from a proceeding, they must immediately inform their manager who will re-assign that work to another staff member.

To further avoid the appearance of conflicts of interest, all CAPS cases where a DECAL employee is a member of the family unit must be brought to the attention of and overseen by a CAPS Manager. The CAPS Manager will assign the case to a CAPS Coordinator to process and the CAPS Manager will conduct a quality assurance review of that case to ensure accuracy.

8.5 Managing Program Integrity for Parents

8.5.1 Processing of Overpayments caused by Parents

CAPS staff will use guidelines above to determine errors that lead to improper payments in order to process overpayments when **parents** receive subsidy payments for which they were not eligible.

When an overpayment is identified for a **parent**, proceed with the following steps:

Step	CAPS Staff Action for AE and CE Overpayments						
1	<p>After determining an overpayment has occurred due to an administrative error (AE) or client error (CE), use the Report of Claim Determination (Form 112) and the Claims Determination Worksheet (Form 112A – 2nd page) to calculate the total amount of the overpayment.</p> <p>(A) If the overpayment results from an AE, document the case record and take no further action.</p> <p>(B) If the overpayment results from a CE and is:</p> <table border="1"> <thead> <tr> <th>Amount</th> <th>CAPS Staff Action</th> </tr> </thead> <tbody> <tr> <td>Less than \$600</td> <td>Proceed to Step 2.</td> </tr> <tr> <td>\$600 or greater</td> <td>Refer the case to DECAL Audits and Compliance (See Section 8.5.2 for the referral process).</td> </tr> </tbody> </table>	Amount	CAPS Staff Action	Less than \$600	Proceed to Step 2.	\$600 or greater	Refer the case to DECAL Audits and Compliance (See Section 8.5.2 for the referral process).
Amount	CAPS Staff Action						
Less than \$600	Proceed to Step 2.						
\$600 or greater	Refer the case to DECAL Audits and Compliance (See Section 8.5.2 for the referral process).						
2	Review with your supervisor as to the accuracy of the overpayment determination.						
3	Send the approved Child Care Repayment Statement (Form 111C) or other system-generated notice to the parent notifying him/her of the established claim . Document the case record of actions taken.						
4	<p>If the parent does not complete and return the Form 111C within 10 calendar days, the CAPS staff must:</p> <p>(A) Contact the parent to ensure the Form 111C was received. If not received, verify current contact information and inform the parent of the information contained in the 111C.</p> <p>(B) If the 111C was received and not submitted within 10 calendar days, take action to close the child care case:</p> <ul style="list-style-type: none"> Mail the Disposition and Parent Information form (Appendix L), along with the original Form 111C or system-generated notice to the parent including 14 calendar days for adverse action. Include rights to an administrative hearing of the overpayment amount. Refer to Administrative Hearings Policy (CAPS/00-18) for procedures governing the administrative hearing process. 						
5	If the parent responds within 14 calendar days disputing the agency’s findings, review the information provided and make a determination within 10 calendar days. Send the Child Care Claims and Collection Notice (Form 113C) or system-generated notice to the parent .						
6	If the parent is a Temporary Assistance for Needy Families (TANF) applicant/recipient , inform the TANF Family Independence CAPS staff that the parent is required to repay a claim for child care.						

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Step	CAPS Staff Action for AE and CE Overpayments
7	Calculate the minimum amount the parent must pay each month by dividing the total claim amount by 12. The resulting amount is the minimum monthly payment owed by the parent .
8	If the resulting amount poses a hardship on the parent , consult with your supervisor to determine if a renegotiation of the repayment statement to a lower amount can occur. Renegotiations can occur as long as the claim is paid in full within 24 months.
9	By the 5 th business day after the claim has been processed, send completed copies of Child Care Claims and Repayment Statement (Form 111C), CAPS Report of Claim Determination (Form 112), and the CAPS Claims Determination Worksheet (112A) or system-generated notice to DECAL: Georgia Department of Early Care and Learning Financial Services – CAPS Claims 2 Martin Luther King Jr. Drive, East Tower, Suite 670 Atlanta, GA 30334
10	File a copy of each form in the parent's case record and document all actions taken.

Note: If a **parent** files bankruptcy any notification of the bankruptcy must be sent to the legal staff responsible for processing.

8.5.2 Parent Referrals for Investigations and Program Violations

If the **parent** is suspected of a **program violation**, a determination of on-going eligibility must be made prior to referring the case to DECAL's Audits and Compliance Division. All suspected program violations involving the **parent** must be referred to DECAL's Audits and Compliance Division regardless of continued eligibility status and amount of the improper payment.

If it is determined that the **parent** is suspected of a CAPS program violation, complete the following steps:

Step	CAPS Staff Action for PV Parent Overpayments								
1	Submit a completed referral to the DECAL Request for Investigation (Form 5667) to: Georgia Department of Early Care and Learning Office of Audits and Compliance 2 Martin Luther King Jr. Drive, SE Suite 754-East Tower Atlanta, GA 30334 CAPS.Investigations@decals.ga.gov								
2	Document the case record including the date of referral.								
3	Take no further action until notification of a decision from the investigation is received.								
4	Update the case according to investigation results and provide notification to parent of the agency action. <table border="1" data-bbox="284 1470 1442 1785"> <thead> <tr> <th>Investigation Result</th> <th>CAPS Staff Action</th> </tr> </thead> <tbody> <tr> <td>Establish claim</td> <td>Follow procedures outlined in Section 8.5.1 (Processing of Overpayments caused by Parents) to establish the claim.</td> </tr> <tr> <td>Continue Eligibility</td> <td>Provide the parent notification of on-going services.</td> </tr> <tr> <td>Notice of Non-Compliance</td> <td>(A) Close the case. (B) Complete Disposition and Parent Information form (Appendix L) and notify the parent and child care program, providing timely notice of case termination and last date of authorized services.</td> </tr> </tbody> </table>	Investigation Result	CAPS Staff Action	Establish claim	Follow procedures outlined in Section 8.5.1 (Processing of Overpayments caused by Parents) to establish the claim.	Continue Eligibility	Provide the parent notification of on-going services.	Notice of Non-Compliance	(A) Close the case. (B) Complete Disposition and Parent Information form (Appendix L) and notify the parent and child care program, providing timely notice of case termination and last date of authorized services.
Investigation Result	CAPS Staff Action								
Establish claim	Follow procedures outlined in Section 8.5.1 (Processing of Overpayments caused by Parents) to establish the claim.								
Continue Eligibility	Provide the parent notification of on-going services.								
Notice of Non-Compliance	(A) Close the case. (B) Complete Disposition and Parent Information form (Appendix L) and notify the parent and child care program, providing timely notice of case termination and last date of authorized services.								
5	Document the case record of all actions taken.								

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Step	CAPS Staff Action for PV Parent Overpayments
6	DO NOT attempt to re-negotiate consent agreements or court orders obtained by DECAL’s Audits and Compliance Division.

8.5.3 On-going Case Management for Active Cases with Claims

DECAL Financial Services office will recoup and track repayment of active cases with claims for CAPS **parents**. The **parent** may continue to receive services as long as agreed upon payments are received. If the **parent** stops making payments and the claim is not paid in full, he/she may be subject to sanctions, up to and including **suspension** and termination of child care services. Refer to [CAPS Program Integrity Policy \(CAPS/00-16\)](#) for additional information regarding sanctions for **parents**.

8.5.4 Collection Procedures for Closed Parent Cases

If staff closes a CAPS case that has an outstanding claim, the **parent** maintains responsibility for repayment of the balance. CAPS staff must complete the following steps:

Step	CAPS Staff Action
1	Send the Child Care Claims and Repayment Agreement (Form 111C) to the parent for three consecutive months when the parent fails to make a payment on the claim.
2	No further collection attempts are necessary unless the parent reapplies for CAPS.
3	File any mail returned by the postal services in the parent’s case record. Note: No further letters are to be sent unless a current address is obtained.
4	Document all actions taken in the case record.

If a new application is received from a **parent** with a previously established overpayment claim, staff must complete the following steps:

Step	CAPS Staff Action
1	Contact and inform the parent of the outstanding balance of the previous claim.
2	If payments are not current, a new application should not be approved until all sanctions have been resolved and a new repayment agreement has been signed. Work with the parent to obtain a completed repayment agreement.
3	Instruct the parents to submit all payments for claims in the form of a cashier’s check or money order to: Georgia Department of Early Care and Learning Financial Services – CAPS Claims 2 Martin Luther King Jr. Drive East Tower, Suite 670 Atlanta, GA 30334
4	Submit all forms (111-C , 112 , and 113-C or system generated notice) to the above address within five calendar days after the claim documents have been processed.

8.5.5 Procedure for Underpayments for Parents

When an **underpayment** for a **parent** is determined, complete the following steps:

Step	CAPS Staff Action
1	Determine what change caused the underpayment and make any necessary changes to prevent the continuance of an underpayment.

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Step	CAPS Staff Action
2	Determine the date the underpayment first occurred. (A) If the underpayment occurred more than 90 calendar days before discovery, take no further action. (B) If the underpayment occurred within 90 calendar days of discovery, proceed to Step 3.
3	Calculate the underpayment using CAPS Claims Determination Worksheet (Form 112A) or system-generated notice starting with the first week it occurred.
4	Authorize reimbursement of the underpayment using CAPS Claims Determination Worksheet (Form 112) or system-generated notice.
5	By the 5 th calendar day after the underpayment has been established, send completed copies of CAPS Claims Determination Worksheet (Form 112 & 112A) or system-generated notice to DECAL: Georgia Department of Early Care and Learning Financial Services – CAPS Claims 2 Martin Luther King Jr. Drive East Tower, Suite 670 Atlanta, GA 30334
6	File a copy of each form in the parent's case record.
7	Send Child Care Claims and Collection Notice (Form 113C) or system-generated notice to the parent to notify him/her of the underpayment.
8	Document all actions taken in the case record.

8.6 Managing Program Integrity for Child Care Providers

8.6.1 Processing Improper Payments for Providers

Improper payments (overpayments and underpayments) may be discovered at multiple levels, either by DECAL staff, contractor staff, or may be reported by the general public. Child care provider overpayments can include administrative errors (AE), provider errors (PE), or program violations (PV). Upon receipt of information related to a possible improper payment or to determine if an improper payment has occurred, CAPS staff must determine whether the claim is an underpayment or overpayment and the type of error (AE, PE, or PV) that exists.

When there is an Administrative Error (AE) or Provider Error (PE) against a child care provider and the total of the claim is determined to be less than \$600, staff should complete the following steps:

Step	CAPS Staff Action for AE and PE Overpayments						
1	Expire the incorrect scholarship.						
2	Create a scholarship with the correct payment amount for the remaining eligibility period if the parent remains eligible for on-going services.						
3	Determine the amount of the provider overpayment.						
4	<p>(A) If the overpayment results from an AE, document the case record and take no further action.</p> <p>(B) If the overpayment results from a PE and is:</p> <table border="1" data-bbox="337 1732 1421 1900"> <thead> <tr> <th>Amount</th> <th>CAPS Staff Action</th> </tr> </thead> <tbody> <tr> <td>Less than \$600</td> <td>Proceed to Step 5.</td> </tr> <tr> <td>\$600 or greater</td> <td>Refer the case to DECAL Audits and Compliance Unit (See Section 8.6.2 for the provider referral process).</td> </tr> </tbody> </table>	Amount	CAPS Staff Action	Less than \$600	Proceed to Step 5.	\$600 or greater	Refer the case to DECAL Audits and Compliance Unit (See Section 8.6.2 for the provider referral process).
Amount	CAPS Staff Action						
Less than \$600	Proceed to Step 5.						
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Step	CAPS Staff Action for AE and PE Overpayments
5	Send notification using the system functionality to the SPMA detailing: <ul style="list-style-type: none"> Name and demographic information of child care provider Type of improper payment (PE) Amount of improper payment Dates improper payment occurred Certificate/child demographic information included in the improper payment
6	Submit copies of all documentation that supports the findings and cause of the overpayment to the SPMA.
Step	State Provider Management Agent (SPMA) Action for PE less than \$600
1	The SPMA will review notification received from CAPS to determine claim and supporting information.
2	Send notice to child care provider detailing the claim amount, repayment options, and right for an administrative hearing. <ul style="list-style-type: none"> (A) If the provider does not return the request for appeal within ten calendar days, the SPMA will take actions to begin recoupments of future payments. (B) If the provider submits request for appeal, the SPMA will forward hearing request to: <p style="margin-left: 40px;">Georgia Department of Early Care and Learning Ira Sudman, Chief Legal Officer 2 Martin Luther King Jr. Drive, East Tower, Suite 754 Atlanta, GA 30334</p>
3	If the child care provider agrees with the determination of the improper payment, the SPMA will begin processing recoupment and collection of funds from future payments.

8.6.2 Child Care Provider Referrals for Investigations and Program Violations (PV)

A referral to DECAL Audits and Compliance Unit will be made in the following instances:

- When a PE results in an overpayment of \$600 or more within a three-year period or less
- Any and all program violations

When it appears that a child care provider may have provided false or misleading information in order to receive funds or that there has been a program violation involving CAPS, staff complete the following steps:

Step	CAPS Staff Action
1	If the violation involves a CAPS, DFCS or DECAL staff member, contact must be made to CAPS within one business day of determination. Information can be provided via email to caps.complaints@decalfga.gov or by calling 1-833-4GACAPS (1-833-442-2277). All information received will remain confidential.
2	Send a referral to the DECAL Audits and Compliance Unit by completing the Request for Child Care Provider Investigation Form (Form 5667-B) and routing the form to: <p style="margin-left: 40px;">Georgia Department of Early Care and Learning Office of Audits and Compliance 2 Martin Luther King Jr. Drive, SE Suite 754-East Tower Atlanta, GA 30334 CAPS.Investigations@decalfga.gov</p>
3	Document the provider activity log and include the date of referral.
4	If the case is being referred to DECAL’s Audits and Compliance Division, there should be no attempt to negotiate a repayment agreement or contact the parent or child care provider regarding the investigation.

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During a DECAL Audits and Compliance investigation:

- The Audits and Compliance Examiner will give the child care provider 15 calendar days from receipt of notice to respond to any request for records via mail. The examiner will review all requested documents and determine if a claim exists.
- If the child care provider does not comply with any requests or fails to provide documents to support requests for payment, the DECAL Audits and Compliance Examiner will notify them of the repayment options and any future sanctions that may be imposed.
- The results of the investigation will be sent to the SPMA and copied to the DECAL Adverse Action and Claims unit. The SPMA is responsible for pursuing, collecting, tracking, and reporting claims negotiated by DECAL Audits and Compliance for child care program violations.

Failure to comply with an investigation may result in further sanctions imposed by the CAPS program, up to and including any and all legal remedies available to DECAL.

Note: Claims brought against child care providers due to program violations should not be terminated until the claim is paid in full. Claims should be documented in the child care provider's record for collection processes even if the provider no longer receives CAPS subsidies or is no longer operating. In these cases, payments for claims can be processed manually. Cases for child care providers should not be closed until the investigations have been completed and all overpayments are paid in full.

8.6.3 Processing Claims for Child Care Provider Repayment Agreements

The SPMA is responsible for recouping claims and managing any monies related to an improper payment when the claim is the result of a PE or PV of a child care provider.

Child Care Claims and Repayment Statement, CAPS Claims Determination Worksheet, Child Care Claims, and Collection Notice, or system-generated forms/notices are required for claims entered in the **State Provider Management System (SPMS)**.

The SPMA is responsible for:

- Negotiating a repayment agreement for claims not processed through Audits and Compliance
- Conveying a child care provider's right to an appeal of the claim amount
- Establishing offsets for child care provider claims that are substantiated (either through the appeals process or by voluntary participation by the child care provider)
- Notifying the child care provider of any action taken on the claim (e.g., claims notification, payment schedule, claim balance, etc.)
- Collecting claims and tracking the amount paid and balance due for each Claim
- Notifying inactive child care providers of requirements for on-going manual payments
- Reporting the status of the claim

Note: If the child care provider stops caring for children receiving CAPS subsidies, the state SPMA will send Child Care Claims and Collection Notice or system-generated letter to the child care provider to pursue the claim for three consecutive months, at which time DECAL will seek all available legal remedies to pursue collections. The child care provider will be flagged in the system to trigger offsets of substantiated claims if the child care provider becomes active in the future.

8.6.4 Procedure for Underpayments for Child Care Providers

Underpayments to child care providers may occur for various reasons, including but not limited to data entry errors, incorrect assessment in the level of the need for care, incorrect start dates for care, and incorrect type of care authorized. Reasons for underpayment will result in an incorrect amount authorized or an issue with the child care provider's submission of under-billed **service weeks**.

There are two possible scenarios where a child care provider may be under paid.

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<i>Scenario 1</i>	Step	CAPS Staff Action
<i>Incorrect amount authorized on scholarship.</i>	1	Determine the date the underpayment first occurred. (A) If the underpayment occurred more than 90 calendar days before discovery, take no further action. (B) If the underpayment occurred within 90 calendar days of discovery, proceed to Step 2 .
	2	Expire the first scholarship using the Sunday of the last paid service week.
	3	Send a system alert or e-mail to the SPMA that indicates the child care provider was underpaid for service week(s) and the amount underpaid for each week. (This should be the difference between old and new amounts to provider.)
	4	Create a new scholarship for eligibility for on-going services with the correct rate.
	5	Document all actions taken in the case record.

<i>Scenario 2</i>	Step	CAPS Staff Action
<i>Provider A submitted invoice for “No Care” because child was actually attending at Program B. Provider B never received payment for services and the family remained eligible.</i>	1	Determine the date the underpayment first occurred. (A) If the underpayment occurred more than 90 calendar days before discovery, take no further action. (B) If the underpayment occurred within 90 calendar days of discovery, proceed to Step 2 .
	2	Expire the scholarship for Provider A using the Sunday of the last paid service week.
	3	Create scholarship for Provider B for the correct eligibility period.
	4	Send a system alert to the SPMS to inform them of the need for review and payment processing on the occasional scholarship .
	5	Document all actions taken in the case record.

Note: The SPMA will review and issue underpayment for the service week(s) to Provider B.

PROCEDURE REVISION HISTORY

Date	Description of Change
07/02/2018	Revised to indicate that DECAL will not seek recoupment for any claims based completely on administrative error. Previously, DECAL would seek recoupment if the claim based completely on administrative error exceeded \$600.
02/01/2019	Changed the name of this policy from “Managing Improper Payments and Program Violations” to “Managing Program Integrity.”
10/01/2019	Added language related to conflicts of interest and revised language to note that CAPS will provide 14 days’ notice of adverse actions.