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Rob Sand  
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**NEWS RELEASE**

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FOR RELEASE

May 10, 2022

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Auditor of State Rob Sand today released a report on a special investigation of billings submitted by FAMILY, Inc. for the period July 1, 2017 through May 31, 2021. FAMILY, Inc. is a non-profit organization that provides public health and family support services to women, children, and families in Pottawattamie and Mills Counties. The special investigation was requested by Iowa Department of Public Health (IDPH) officials as a result of concerns that FAMILY, Inc. billed Medicaid for services which were also funded as part of service contracts established by IDPH for the Maternal, Infant, Early Childhood Home Visitation (MIECHV) and Early Childhood Iowa (ECI) programs.

Sand reported the contracts IDPH established for the MIECHV and ECI programs did not allow billing any other sources for the surveys conducted for the programs. However, the special investigation determined FAMILY, Inc. billed Medicaid for 328 surveys conducted under the contracts and received \$20,016.66 for billed services from July 1, 2017 through May 31, 2021. Specifically, improper billings resulted in \$9,252.41 and \$10,764.25 paid to FAMILY, Inc. for surveys 153 and 175 conducted under the MIECHV and ECI programs, respectively.

Sand also reported it was not possible to determine if additional billings were improperly submitted to and paid by Medicaid prior to July 1, 2017 because sufficient records were not available for that period.

In addition, Sand reported procedures were performed determine if any other providers improperly billed Medicaid for surveys conducted under MIECHV and ECI contracts but additional improper payments were not identified. Sand also reported IDPH officials implemented additional controls and reviews in 2021 to ensure providers receiving MIECHV and ECI funding do not bill other sources for the same services.

The report includes recommendations to strengthen the Iowa Department of Public Health's internal controls and operations, such as periodic comparison of surveys completed to billings submitted to Medicaid. The report also includes a recommendation for recovery of the amounts paid to FAMILY, Inc. as a result of the improper billings.

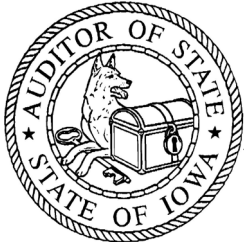
Copies of this report have been filed with the Polk County Attorney's Office, the Attorney General's Office, and the Division of Criminal Investigation. A copy of the report is available for review on the Auditor of State's web site at [Special Interest Reports](#).

# # #

**REPORT ON SPECIAL INVESTIGATION  
OF BILLINGS SUBMITTED BY  
FAMILY, INC.  
FOR SERVICES RELATED TO CONTRACTS ISSUED BY THE  
IOWA DEPARTMENT OF PUBLIC HEALTH  
  
FOR THE PERIOD  
JULY 1, 2017 THROUGH MAY 31, 2021**

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Auditor of State's Report

To Director Kelly Garcia,  
Iowa Department of Public Health:

As a result of concerns that FAMILY, Inc. billed Medicaid for services which were also funded as part of service contracts the Iowa Department of Public Health (IDPH) established for the Maternal, Infant, Early Childhood Home Visitation (MIECHV) and Early Childhood Iowa (ECI) programs and at the request of IDPH officials, we conducted a special investigation of billings submitted by FAMILY, Inc. We have applied certain tests and procedures to selected financial transactions of FAMILY, Inc. for the period July 1, 2017 through May 31, 2021 unless otherwise specified. Based on a review of relevant information and discussions with IDPH officials and representatives of the organization with which IDPH established the MIECHV and ECI contracts (Promise Partners), we performed the following procedures.

- (1) Reviewed information from Promise Partners officials and procedures performed by IDPH officials to obtain an understanding of the concerns identified related to FAMILY, Inc.
- (2) Evaluated the IDPH's and Promise Partners' internal controls regarding contract provisions, monitoring, and performance reviews regarding the MIECHV and ECI programs to determine if policies and procedures in place were operating effectively.
- (3) Interviewed IDPH, Promise Partners, and FAMILY, Inc. officials to obtain an understanding of the surveys and assessments completed by FAMILY, Inc. as part of the MIECHV and ECI programs and any related financial transactions.
- (4) Obtained from the Department of Human Services – Iowa Medicaid Enterprise Medicaid (DHS-IME) billings submitted by FAMILY, Inc. from January 1, 2016 through June 30, 2021 for services eligible for funding by the MIECHV and ECI programs to identify the amounts claimed and any amounts paid to FAMILY, Inc. for the services.
- (5) Compared completed surveys recorded in the IDPH database system by FAMILY, Inc. for the MIECHV and ECI programs to Medicaid billings submitted by FAMILY, Inc. to determine if completed surveys were also billed to Medicaid.
- (6) Matched information from DHS-IME to information from IDPH to determine if providers other than FAMILY, Inc. billed Medicaid for services also covered by the MEICHV and ECI programs.
- (7) Interviewed IDPH officials to obtain an understanding of additional controls and monitoring procedures implemented as a result of concerns identified regarding billings submitted by FAMILY, Inc to ensure the appropriate funding source was used to pay for services rendered and not billed to multiple funding sources.

These procedures identified 328 surveys which were completed as part of the MIECHV and ECI programs funded by IDPH but for which FAMILY, Inc. also submitted billings to Medicaid. FAMILY, Inc received an additional \$20,016.66 from July 1, 2017 through May 31, 2020 as a result of billings. It was not possible to determine if additional billings were improperly submitted to and paid by Medicaid prior to July 1, 2017 because sufficient records were not available for that period. Several internal control weaknesses were also identified. Our detailed findings and recommendations are presented in the Investigative Summary of this report.

The procedures described above do not constitute an audit of financial statements conducted in accordance with U.S. generally accepted auditing standards. Had we performed additional procedures, or had we performed an audit of financial statements of FAMILY, Inc, other matters might have come to our attention that would have been reported to you.

Copies of this report have been filed with the Polk County Attorney's Office, the Attorney General's Office, and the Division of Criminal Investigation.

We would like to acknowledge the assistance extended to us by IDPH, DHS-IME, Promise Partners, and FAMILY, Inc. officials and staff during the course of our investigation.



Rob Sand  
Auditor of State

May 2, 2022

Report on Special Investigation of  
FAMILY, Inc.  
Investigative Summary

**Background Information**

The Iowa Department of Public Health (IDPH) is the state department focused on putting the knowledge of the public health field into practice in Iowa. IDPH is a partnership of local public health, non-profit organizations, health care providers, policymakers, businesses, and many others working together to protect and improve the health of Iowans. IDPH seeks to improve the quality of life for all Iowans by assuring access to evidence-based population-health programs, services and activities in the following areas:

- Promote healthy living;
- Prevent injuries and violence;
- Protect against environmental hazards;
- Assure access to quality health services;
- Prevent epidemics and the spread of diseases;
- Improve and support public health performance; and
- Prepare for, respond to, and recover from emergencies.

IDPH established contracts with Promise Partners to administer certain programs. According to their website, Promise Partners (rebranded to Thriving Families Alliance in 2021) is an umbrella organization that oversees state and local initiatives. The organization uses interagency and cross-discipline collaboration to better coordinate efforts to effectively address the needs of children and families. IDPH and Promise Partners reported they subcontracted some of program administration duties they contracted for with IDPH to FAMILY, Inc.

FAMILY, Inc. is a non-profit organization that provides access to health programs. FAMILY, Inc. provides public health and family support to women, children and families in Pottawattamie and Mills Counties. According to their website, FAMILY, Inc's primary goal is to assist parents in becoming their child's first and most influential teacher through education, empowerment, and wellness. Through its various programs, FAMILY, Inc. works to ensure families have access to the services and support they need to allow their children to enter school healthy, safe and ready to learn. FAMILY, Inc. has offices located in Council Bluffs, Iowa, and Walnut, Iowa, allowing the agency to serve both urban and rural communities. Services are administered in homes, shelters, and community settings.

As previously stated, IDPH established contracts with Promise Partners to provide families access to health programs and services and Promise Partners subsequently subcontracted those services to FAMILY, Inc. Specifically, IDPH contracted with Promise Partners for the following two programs funded with federal and state resources.

- **Maternal, Infant, Early Childhood Home Visitation (MIECHV) program** – Contracts established for the MIECHV program provide funding for evidence-based home visitation services to improve health and development outcomes for at-risk young children. The program is designed to strengthen and improve the programs and activities carried out under Title V and other community service providers; to improve coordination of services for at-risk communities; and to identify and provide comprehensive services to improve outcomes for families who reside in at-risk communities.

FAMILY, Inc, as a subcontractor of the MIECHV program, was required to adhere to the fiscal year workplan (budget) established by IDPH, perform the specific work and services outlined in the contract, and ensure performance measures were met. As the

subcontractor, FAMILY, Inc. was also responsible for ensuring that at least 90% of their assigned caseload received assessments (surveys and screenings); all completed assessments were input into the Data Application and Integration Solutions for the Early Years (DAISEY) system, a web-based data system maintained by IDPH; and they provided on average six to nine home visits per family per quarter. Additionally, FAMILY, Inc. was to provide monthly expenditure reports, quarterly performance measure data reports, and an annual progress report due by December 15 each year.

- **Early Childhood Iowa (ECI) program** – The ECI program provides funding for comprehensive family support and education utilizing evidence-based home visitation to families with children aged prenatally to school entry in order to produce secure and nurturing families, caring adults, a healthy start and future, and children ready to enter school in safer and supportive communities.

FAMILY, Inc, as a subcontractor of the ECI program, was required to adhere to the fiscal year workplan (budget) established by IDPH, perform the specific work and services outlined in the contract and ensure performance measures were being met. As the subcontractor, they were responsible for ensuring they were following the “Parents as Teachers” (PAT) model; they adhered to IDPH’s coordinated intake; and all completed assessments (surveys and screenings) were input into the DAISEY. Additionally, they were to provide bi-annual progress reports and a cumulative year-end report.

As a subcontractor, FAMILY, Inc. submitted requests for reimbursements for MIECHV and ECI services provided each fiscal year. The contracts IDPH established for the MIECHV and ECI programs did not allow billing any other sources for the services provided under the contracts.

Routine audits are performed by IDPH officials as part of the MIECHV and ECI programs and assistance can be requested to ensure the workplan established, the specific work and services outlined in the contracts, and performance measures are being met. The Executive Director of Promise Partners requested technical assistance for FAMILY, Inc. in April 2021 as a result of difficulty with community relationships. Specifically, Promise Partners’ Executive Director requested assistance from IDPH’s MIECHV program Director because of her experience with both the MIECHV and ECI programs.

On April 14, 2021, Promise Partners’ Executive Director e-mailed FAMILY, Inc. Director stating, “As a follow-up to our conversation today, Family, Inc. and Promise Partners agreed to cease billing Medicaid for ASQ [*Ages & Stages Questionnaires*®] developmental screening for ECI families until we receive further clarification. In addition, we agreed to submit ECI reimbursements as usual until we have additional direction. As discussed, FAMILY, Inc has already ceased billing Medicaid for ASQ developmental screenings for all MEICHV funded families.”

Also, in a letter to FAMILY, Inc. officials dated April 15, 2021, IDPH addressed concerns identified during a routine audit and response to assistance that had been requested by Promise Partners. Specifically, the letter disclosed that FAMILY, Inc. billed Medicaid for services for which FAMILY, Inc. had already been paid by their contracts for home visit services funded by the ECI and MIECHV programs. The letter also acknowledged FAMILY, Inc. officials confirmed that it had been an expectation and practice of their organization to bill Medicaid for all development screenings for families participating in the Parents as Teachers (PAT) Program. The PAT program is an in-home visitation program for parents with children ages birth to 5 which provides parents with child developmental knowledge and parenting support, early detection of developmental delays and health issues, prevent child abuse and neglect, and increase children’s school readiness.

According to IDPH officials, FAMILY, Inc. officials reported that they “had stopped billing Medicaid for families participating in the PAT program that is funded by MIECHV by March 13, 2020, under the advisement of their Maternal Child Health consultant.” In December 2019 IDPH staff conducted a chart audit of Title V clinical services provided by FAMILY, Inc. Included in the charts provided for review was documentation of a developmental screening conducted by a home visitor; however, home visit services



were not a part of the Title V services provided by FAMILY, Inc. Because the IDPH official who reviewed the chart was aware Title V and MIECHV program goals align and may provide similar services, the chart was accepted as documentation of a service provided under Title V funding even though the visit wasn't properly documented as a Title V service. This deficiency was cited and discussed with a representative of FAMILY, Inc. The IDPH official also reported she discussed with the FAMILY, Inc. representative the need to ensure the service was not a MIECHV requirement for which FAMILY, Inc. was already receiving funds because also billing Medicaid for the service would be "double dipping." The IDPH official reported she was told FAMILY, Inc. was not doing that.

In addition, the IDPH limited procedures showed billings to Medicaid for developmental screenings provided by FAMILY, Inc. employees whose salary was paid with MIECHV funds prior to March 13, 2020." According to IDPH officials, FAMILY, Inc. officials agreed to "discontinue billing Medicaid for families participating in the PAT program that is funded by ECI immediately" during a meeting on April 14, 2021.

Because of the concerns identified regarding FAMILY, Inc. billing Medicaid for services already paid for under existing contracts with IDPH, IDPH officials contacted the Office of Auditor of State on June 4, 2021 to request the Office of Auditor of State to review certain transactions of FAMILY, Inc.

As a result of the concerns identified and the request made by IDPH officials, we performed the procedures detailed in the Auditor of State's Report for the period July 1, 2017 through May 31, 2021.

### Detailed Findings

The procedures performed identified 328 surveys which were completed as part of the MIECHV and ECI programs funded by IDPH but for which FAMILY, Inc. also submitted billings to Medicaid. FAMILY, Inc. received an additional \$20,016.66 from July 1, 2017 through May 31, 2021 as a result of the billings. The surveys identified are summarized in **Table 1** by program along with the Medicaid billings improperly submitted and paid.

**Table 1**

Program	Number of Surveys Billed	Medicaid Billings	
		Submitted	Paid
MIECHV	153	\$ 14,408.59	9,252.41
Early Childhood Iowa	175	14,307.21	10,764.25
Total	328	\$ 28,715.80	20,016.66

It was not possible to determine if additional surveys completed were improperly billed to Medicaid because adequate supporting documentation was not available for the period prior to July 1, 2017. A detailed explanation of each finding follows. The following paragraphs also include information provided by FAMILY, Inc. during an interview we held with their Executive leadership and their attorney on April 27, 2022.

#### IMPROPER BILLINGS

As previously stated, all assessments (surveys and screenings) completed by FAMILY, Inc. as part of the MIECHV and ECI programs were to be recorded at least quarterly in DAISEY. Assessments to be completed by FAMILY, Inc. for the programs included:

- Ages and Stages Questionnaires (ASQ) – developmental screening tool that pinpoints development progress in children between the ages of one month and five and a half years of age. Different versions of the ASQs cover various age groups.
- Edinburgh Postnatal Depression Scales (EPDS) – used to identify women who may have postpartum depression.

The data from the assessments were provided to Promise Partners and IDPH at least quarterly for review and to ensure FAMILY, Inc. was completing the assessments in accordance with their contracts.

According to IDPH officials, FAMILY, Inc. did not become a provider for the MIECHV program until July 1, 2017 but had been a provider for the ECI program since January 1, 2001. However, IDPH officials also reported information was not recorded in DAISEY prior to July 1, 2017 and as a result, was not available for our review. As a result, we performed testing procedures for the surveys completed by FAMILY, Inc. as part of the MIECHV and ECI programs for the period July 1, 2017 through May 31, 2021.

**MIECHV and ECI Programs** – Using reports we obtained from DAISEY, we identified all surveys and screenings recorded by FAMILY, Inc. for the MIECHV and ECI programs for the period July 1, 2017 through May 31, 2021. The reports included the names of the family members for whom the surveys and screenings were completed, the dates of surveys and screenings, and the ages of individuals. We sorted the data in the reports by individual name and date of survey or screening for both the MIECHV and ECI programs.

We also obtained a report from the Department of Human Services – Iowa Medicaid Enterprise (DHS-IME) which included all Medicaid billings submitted for the provider numbers assigned to FAMILY, Inc. and the specific Medicaid billing codes related to visits, surveys, and screenings for the period of January 1, 2016 through June 30, 2021.

Using the reports obtained from IDPH and DHS-IME, we compared the names of the individuals surveyed/screened and survey/screening dates. If the Medicaid billing report included an individual’s name and a service date within ten days of a survey/screening date for the same individual listed in the DAISEY reports, we determined the billing submitted to Medicaid (DHS-IME) was a duplicate payment to FAMILY, Inc. for services provided by the MIECHV or ECI program contracts. We did not identify any screenings for which FAMILY, Inc. received duplicate payments; however, we identified 328 surveys which FAMILY, Inc. completed as part of the MIECHV or ECI programs funded by IDPH but for which FAMILY, Inc. also submitted billings to Medicaid.

**Exhibits A and B** list the surveys FAMILY, Inc. completed for the MEICHV and ECI programs, respectively, for which they also received a duplicate payment. For the surveys for which FAMILY, Inc. received duplicate payments, we determined the billing amounts submitted by FAMILY, Inc. and the amounts paid to FAMLY, Inc. using the DHS-IME report.

The number of surveys identified for which FAMILY, Inc. received duplicate payments are summarized in **Table 2**, along with the number of individuals for whom the surveys were completed, the earliest and most recent dates of the surveys, the amount of billings FAMILY, Inc. submitted for the surveys, and the amount they were paid.

<b>Description</b>	<b>MEICHV, (Exhibit A)</b>	<b>ECI, (Exhibit B)</b>	<b>Total</b>
<u>Number of:</u>			
Clients*	41	78	118
Surveys	153	175	328
<u>Survey dates:</u>			
Earliest	07/25/17	08/02/18	07/25/17
Most recent	03/13/20	09/23/20	09/23/20
<u>Total value:</u>			
Submitted	\$ 14,408.59	14,307.21	28,715.80
Paid	9,252.41	10,764.25	20,016.66

\* - One client identified received services from both MEICHV and ECI.

As illustrated by **Table 2** and **Exhibits A** and **B**, we identified 153 and 175 surveys that were improperly billed to Medicaid for the MEICHV and ECI programs, respectively. The amount of the claims submitted for the 328 surveys totaled \$28,715.80 and FAMILY, Inc. was paid \$20,016.66 for the claims. The amount of claims submitted and paid are included in **Table 1** as improper duplicate billings.

**Breakdown of Billings** – Prior to 2016, providers who served Medicaid eligible individuals, such as Promise Partners and FAMILY, Inc., applied to DHS through Medicaid’s provider enrollment process. Providers who were determined to be licensed and in good standing were allowed to become an authorized Medicaid provider. After providing services to Medicaid members, authorized providers billed DHS for the services and were paid on a fee-for-service (FFS) basis. In 2015 Iowa moved toward a risk-based managed care approach (MCO model) for Iowa’s Medicaid program and ultimately transitioned most Iowa Medicaid members from the FFS model to a Medicaid managed care system effective April 1, 2016.

Under the FFS model, health care providers are paid for each allowable covered service provided to a Medicaid member. These payments are made by DHS-IME after receipt of a claim from a provider. Under the managed care model, DHS-IME pays a monthly capitation payment to the MCO for each member enrolled in the MCO’s plan. The MCO then pays providers for the allowable services provided to Medicaid members. A capitation payment, similar to an insurance premium, is the payment made each month by the State to the MCO on behalf of each member enrolled in the plan, based on the actuarially determined capitation rate for the provision of services under the State plan.

While most Iowa Medicaid members are enrolled in the managed care program with coverage provided by an MCO, some Medicaid members continue to receive Medicaid coverage through FFS programs. Also, while DHS-IME does not pay for all services directly, data for all services paid through the MCO process must be submitted to DHS-IME. This data, referred to as encounter data, includes information such as the patient served, the date of service, the type of service provided, the duration or quantity of services, and identification of the provider. Encounter data was used to compare to the assessments recorded in DAISEY.

During our review of the encounter data received from DHS-IME, including billing and payment information, we determined that some of the surveys for which FAMILY, Inc. received a duplicate payment were paid by an MCO and others were paid through the FFS process. **Table 3** summarizes the amounts paid through each process for each program.

**Table 3**

<b>Program</b>	<b>Exhibit</b>	<b>MCO</b>	<b>FFS</b>	<b>Total</b>
MEICHV	<b>A</b>	\$ 8,637.31	615.10	9,252.41
ECI	<b>B</b>	10,764.25	-	10,764.25
Total		\$ 19,401.56	615.10	20,016.66

IDPH officials reported they notified oversight officials, such as the MIECHV federal project officer and the interim IDPH Director of the potential duplicate amounts paid to FAMILY, Inc. at the time they became aware of them. They also reported all parties notified agreed it would be appropriate for FAMILY, Inc. to reimburse Medicaid for the funding they improperly received and that DHS-IME will coordinate efforts to recoup the funds and any applicable penalties. It would be appropriate for DHS-IME officials to consider the mix of the payments as summarized in **Table 3** as recoupment plans are developed.

During our interview with FAMILY, Inc. officials, they reported ASQs were not part of the MIECHV and ECI programs and specified there was nothing in the contracts that required ASQs be done as part of either program. FAMILY, Inc. officials also reported they performed the ASQs in addition to the in-home visits required by the MIECHV and ECI contracts and they billed Medicaid for the completed assessments because ASQs were a Medicaid billable service performed in addition to the MIECHV/ECI home visits. However, according to IDPH officials and our review of the MIECHV and ECI contracts, FAMILY, Inc. was to use the PAT model as the framework for the programs. The PAT model requires an

ASQ be completed during every in-home visit. As a result, completing ASQs is required under the programs' contracts. Correspondence received from FAMILY, Inc.'s legal counsel following our interview is included in **Appendix 1**.

In addition, for the period July 1, 2017 through May 31, 2021, we obtained access to DAISEY records for all entities which administered the MIECHV and ECI programs on behalf of IDPH and a report from DHS-IME which included all Medicaid billings submitted for specific billing codes related to visits, surveys, and screenings for all provider numbers. Using this information, we confirmed providers other than FAMILY, Inc. completed ASQs as part of the MIECHV and ECI programs. We also verified none of the providers identified received a payment from DHS-IME for the ASQs. As a result, the explanation provided by FAMILY, Inc. leadership we met with was not accurate.

**Self-Reported Claims** – In April 2021, IDPH officials requested FAMILY, Inc. self-report the MIECHV surveys recorded in DAISEY for which they also billed Medicaid. A similar request was not made for the ECI surveys recorded in DAISEY. IDPH officials provided us a copy of the report they received from FAMILY, Inc. in response to the request. Using the self-reported listing created by FAMILY, Inc, we compared the surveys identified by FAMILY, Inc. to the reports we obtained from the DAISEY system and DHS-IME and used for testing.

As a result of our comparison, we identified discrepancies between what FAMILY, Inc. self-reported and the results of our testing. Specifically, we identified 34 surveys on the DAISEY system for which FAMILY, Inc. received a duplicate payment, but which were not included in report submitted by FAMILY, Inc. These 34 surveys are included in **Table 2** and FAMILY, Inc. was paid \$2,023.68 for them.

We also identified 63 surveys identified by FAMILY, Inc. as those for which they received a duplicate payment. However, we did not identify a corresponding billing on the report we obtained from DHS-IME. FAMILY, Inc. reported they received \$3,936.64 for the 63 surveys. We inquired about the 63 surveys when we met with FAMILY, Inc. leadership and were told they did not have sufficient accounting staff available at the time the information was gathered for IDPH. As a result, they were unable to confirm its accuracy. Because we were unable to trace these to the Medicaid billing report obtained from DHS-IME, they are not included in **Table 1**.

## **Recommended Control Procedures**

As part of our investigation, we reviewed the procedures used by the Iowa Department of Public Health, Promise Partners, and FAMILY, Inc. regarding the MIECHV and ECI programs. An important aspect of internal control is to establish procedures which provide accountability for assets susceptible to loss from errors and irregularities. These procedures provide the actions of one individual will act as a check on those of another and provide a level of assurance errors or irregularities will be noted within a reasonable time during the course of normal operations. Based on our findings and observations detailed below, the following recommendations are made to strengthen internal controls.

- A. Periodic Review of Services Billed – IDPH officials perform regular reviews to ensure the workplan established, the specific work and services outlined in the contracts and performance measures are being met by contractors and subcontractors. However, IDPH officials currently do not periodically compare services provided for and paid under specific contracts to billings submitted to and paid by Medicaid.

Recommendation – IDPH officials should consider establishing arrangements with DHS-IME officials which would allow IDPH officials to periodically compare services paid for with IDPH funds to services billed to Medicaid to identify any duplicate payments claimed by/paid to provider organizations. These comparisons should be evidenced by the signature and date of the individual completing the comparison.

IDPH officials should also develop procedures to be performed in the event duplicate payments are identified, including immediate corrective actions with the billing entity, recoupment of duplicate payments, and potential sanctions or training required on the part of the billing party.

- B. Recoupment of Duplicate Payments – Family, Inc. was compensated by IDPH for surveys completed under contracts established for the MIECHV and ECI programs. FAMILY, Inc. also received payments for billings submitted to Medicaid for 328 surveys completed under the MIECHV and ECI contracts. The contracts IDPH established for the MIECHV and ECI programs did not allow billing any other sources for the services provided under the contracts.

Recommendation – Recoupment of the amounts paid to FAMILY, Inc. as a result of the Medicaid billings is appropriate. IDPH officials should work with DHS-IME officials to determine the appropriate manner in which to pursue recoupment. Consideration should also be given to whether the claims paid to FAMILY, Inc. were a result of services provided under the MCO or FFS model.

## **Exhibits**

**Exhibit A**Report on Special Investigation of the  
Family, Inc.MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

Client	Survey Date	Survey	Billing Amount Submitted	Amount Paid		
				MCO	FFS	Total
A	09/26/18	ASQ-3	\$ 61.51	61.51	-	61.51
	02/21/19	ASQ-3	122.16	61.51	-	61.51
	04/09/19	ASQ-3	122.16	61.51	-	61.51
	08/07/19	ASQ-3	122.16	61.51	-	61.51
	10/09/19	ASQ-3	63.78	61.51	-	61.51
	11/06/19	ASQ SE-2	63.78	61.51	-	61.51
	03/04/20	ASQ-3	63.78	61.51	-	61.51
B	02/21/19	ASQ-3	122.16	61.51	-	61.51
	10/09/19	ASQ SE-2	63.78	61.51	-	61.51
	03/04/20	ASQ-3	63.78	61.51	-	61.51
C	06/04/19	ASQ SE-2	122.16	61.51	-	61.51
	08/27/19	ASQ-3	122.16	61.51	-	61.51
	10/22/19	ASQ SE-2	63.78	61.51	-	61.51
	12/17/19	ASQ-3	63.78	61.51	-	61.51
D	01/28/20	ASQ-3	63.78	61.51	-	61.51
	03/03/20	ASQ SE-2	63.78	61.51	-	61.51
E	07/29/19	ASQ SE-2	122.16	61.51	-	61.51
	08/30/19	ASQ-3	122.16	61.51	-	61.51
	11/04/19	ASQ-3	63.78	61.51	-	61.51
	12/02/19	ASQ SE-2	63.78	61.51	-	61.51
	02/10/20	ASQ SE-2	63.78	61.51	-	61.51
F	10/27/17	ASQ-3	61.51	-	61.51	61.51
	02/02/18	ASQ-3	61.51	-	61.51	61.51
	04/20/18	ASQ-3	61.51	-	61.51	61.51
	07/27/18	ASQ-3	61.51	-	61.51	61.51
	02/22/19	ASQ-3	122.16	-	61.51	61.51
G	01/14/20	ASQ-3	63.78	61.51	-	61.51
	01/28/20	ASQ SE-2	63.78	61.51	-	61.51

Report on Special Investigation of the  
Family, Inc.

MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

Client	Survey Date	Survey	Billing Amount Submitted	Amount Paid		
				MCO	FFS	Total
H	08/29/19	ASQ-3	122.16	61.51	-	61.51
	10/04/19	ASQ SE-2	63.78	-	-	-
	12/05/19	ASQ-3	63.78	61.51	-	61.51
	01/03/20	ASQ SE-2	63.78	-	-	-
I	07/26/19	ASQ SE-2	122.16	61.51	-	61.51
	08/30/19	ASQ-3	122.16	61.51	-	61.51
	11/04/19	ASQ-3	63.78	61.51	-	61.51
	12/02/19	ASQ SE-2	63.78	61.51	-	61.51
	02/10/20	ASQ SE-2	63.78	61.51	-	61.51
J	04/18/19	ASQ-3	122.16	61.51	-	61.51
	08/16/19	ASQ-3	122.16	61.51	-	61.51
	02/03/20	ASQ-3	63.78	61.51	-	61.51
K	10/10/17	ASQ-3	61.51	61.51	-	61.51
	02/07/19	ASQ-3	122.16	-	61.51	61.51
	05/08/19	ASQ SE-2	122.16	61.51	-	61.51
	07/10/19	ASQ SE-2	122.16	61.51	-	61.51
	08/16/19	ASQ-3	122.16	61.51	-	61.51
L	11/26/19	ASQ-3	63.78	61.51	-	61.51
	12/03/19	ASQ SE-2	63.78	61.51	-	61.51
	03/13/20	ASQ-3	63.78	61.51	-	61.51
M	09/06/19	ASQ-3	122.16	61.51	-	61.51
N	10/27/17	ASQ-3	61.51	61.51	-	61.51
	11/13/18	ASQ-3	122.16	61.51	-	61.51
O	10/31/19	ASQ-3	63.78	61.51	-	61.51
	11/08/19	ASQ SE-2	63.78	61.51	-	61.51
	12/19/19	ASQ-3	63.78	61.51	-	61.51
	01/02/20	ASQ SE-2	63.78	61.51	-	61.51



**Exhibit A**Report on Special Investigation of the  
Family, Inc.MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

Client	Survey Date	Survey	Billing Amount Submitted	Amount Paid		
				MCO	FFS	Total
P	10/04/18	ASQ-3	122.16	61.51	-	61.51
	12/04/18	ASQ-3	122.16	61.51	-	61.51
	01/31/19	ASQ-3	122.16	61.51	-	61.51
	04/10/19	ASQ-3	122.16	61.51	-	61.51
	05/16/19	ASQ-3	122.16	61.51	-	61.51
	08/08/19	ASQ-3	122.16	61.51	-	61.51
	08/15/19	ASQ SE-2	122.16	61.51	-	61.51
	09/27/19	ASQ-3	122.16	61.51	-	61.51
Q	07/20/18	ASQ-3	61.51	-	61.51	61.51
R	04/11/19	ASQ-3	122.16	61.51	-	61.51
	05/29/19	ASQ SE-2	122.16	61.51	-	61.51
	08/05/19	ASQ-3	122.16	61.51	-	61.51
	09/23/19	ASQ-3	122.16	61.51	-	61.51
S	04/25/18	ASQ-3	61.51	-	61.51	61.51
	10/19/18	ASQ-3	122.16	-	61.51	61.51
	04/15/19	ASQ-3	122.16	-	61.51	61.51
T	08/27/19	ASQ-3	122.16	61.51	-	61.51
	10/10/19	ASQ SE-2	63.78	61.51	-	61.51
U	02/04/20	ASQ-3	63.78	61.51	-	61.51
V	01/29/19	ASQ-3	122.16	61.51	-	61.51
W	12/18/19	ASQ-3	63.78	61.51	-	61.51
X	09/28/18	ASQ-3	61.51	61.51	-	61.51
Y	04/18/19	ASQ-3	122.16	61.51	-	61.51
	09/05/19	ASQ-3	122.16	61.51	-	61.51
	10/30/19	ASQ SE-2	63.78	61.51	-	61.51
	01/27/20	ASQ-3	63.78	61.51	-	61.51

Report on Special Investigation of the  
Family, Inc.

MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

Client	Survey Date	Survey	Billing Amount Submitted	Amount Paid		
				MCO	FFS	Total
Z	10/22/18	ASQ-3	122.16	61.51	-	61.51
	01/15/19	ASQ-3	122.16	61.51	-	61.51
AA	09/18/17	ASQ-3	66.12	55.36	-	55.36
	11/13/17	ASQ-3	61.51	61.51	-	61.51
	05/10/19	ASQ-3	122.16	61.51	-	61.51
	09/06/19	ASQ SE-2	122.16	61.51	-	61.51
	10/04/19	ASQ-3	63.78	61.51	-	61.51
AB	09/29/17	ASQ-3	66.12	55.36	-	55.36
	10/12/18	ASQ-3	122.16	61.51	-	61.51
	12/07/18	ASQ-3	122.16	61.51	-	61.51
	02/11/19	ASQ-3	122.16	61.51	-	61.51
	03/29/19	ASQ-3	122.16	61.51	-	61.51
	05/29/19	ASQ-3	122.16	61.51	-	61.51
	07/29/19	ASQ SE-2	122.16	61.51	-	61.51
	08/05/19	ASQ-3	122.16	61.51	-	61.51
	10/17/19	ASQ-3	63.78	61.51	-	61.51
	11/05/19	ASQ-3	63.78	61.51	-	61.51
AC	02/11/20	ASQ SE-2	63.78	61.51	-	61.51
AD	07/02/19	ASQ-3	122.16	61.51	-	61.51
	07/09/19	ASQ SE-2	122.16	61.51	-	61.51
	09/27/19	ASQ-3	122.16	61.51	-	61.51
	01/07/20	ASQ-3	63.78	61.51	-	61.51
	01/20/20	ASQ SE-2	63.78	61.51	-	61.51
AE	09/27/17	ASQ-3	66.12	55.36	-	55.36
	10/12/18	ASQ-3	122.16	61.51	-	61.51
	12/07/18	ASQ-3	122.16	61.51	-	61.51
	02/11/19	ASQ-3	122.16	61.51	-	61.51
	03/29/19	ASQ-3	122.16	61.51	-	61.51
	05/29/19	ASQ-3	122.16	61.51	-	61.51
	07/29/19	ASQ SE-2	122.16	61.51	-	61.51
	08/05/19	ASQ-3	122.16	61.51	-	61.51

**Exhibit A**Report on Special Investigation of the  
Family, Inc.MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

Client	Survey Date	Survey	Billing Amount Submitted	Amount Paid		
				MCO	FFS	Total
	10/17/19	ASQ-3	63.78	61.51	-	61.51
	11/05/19	ASQ-3	63.78	61.51	-	61.51
AF	01/24/19	ASQ-3	122.16	61.51	-	61.51
	03/12/19	ASQ-3	122.16	61.51	-	61.51
	05/02/19	ASQ-3	122.16	61.51	-	61.51
	05/09/19	ASQ SE-2	122.16	61.51	-	61.51
	06/25/19	ASQ-3	122.16	61.51	-	61.51
	08/09/19	ASQ-3	122.16	61.51	-	61.51
	09/03/19	ASQ-3	122.16	61.51	-	61.51
	10/11/19	ASQ-3	63.78	61.51	-	61.51
	10/30/19	ASQ SE-2	63.78	61.51	-	61.51
	02/11/20	ASQ-3	63.78	61.51	-	61.51
	02/18/20	ASQ SE-2	63.78	61.51	-	61.51
AG	02/05/19	ASQ-3	122.16	61.51	-	61.51
	05/02/19	ASQ-3	122.16	61.51	-	61.51
	05/09/19	ASQ SE-2	122.16	61.51	-	61.51
	09/10/19	ASQ-3	122.16	61.51	-	61.51
	10/30/19	ASQ SE-2	63.78	61.51	-	61.51
AH	07/29/19	ASQ SE-2	122.16	61.51	-	61.51
	09/03/19	ASQ-3	122.16	61.51	-	61.51
AI	02/21/19	ASQ-3	122.16	61.51	-	61.51
	04/04/19	ASQ-3	122.16	61.51	-	61.51
	06/03/19	ASQ-3	122.16	61.51	-	61.51
	08/22/19	ASQ SE-2	122.16	61.51	-	61.51
	10/16/19	ASQ-3	63.78	61.51	-	61.51
	12/05/19	ASQ-3	63.78	61.51	-	61.51
	02/06/20	ASQ-3	63.78	61.51	-	61.51
AJ	08/07/19	ASQ SE-2	122.16	50.51	-	50.51
	01/13/20	ASQ-3	63.78	61.51	-	61.51

Report on Special Investigation of the  
Family, Inc.

MEICHV Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid</b>		
				<b>MCO</b>	<b>FFS</b>	<b>Total</b>
AK	10/08/19	ASQ SE-2	63.78	61.51	-	61.51
	10/25/19	ASQ-3	63.78	61.51	-	61.51
	01/23/20	ASQ-3	63.78	61.51	-	61.51
AL	01/15/20	ASQ-3	63.78	61.51	-	61.51
AM	11/08/17	ASQ-3	61.51	61.51	-	61.51
	08/07/18	ASQ-3	61.51	61.51	-	61.51
	01/31/18	ASQ-3	122.16	61.51	-	61.51
	08/08/19	ASQ-3	122.16	61.51	-	61.51
AN	07/25/17	ASQ-3	66.12	55.36	-	55.36
AO	09/18/19	ASQ-3	122.16	61.51	-	61.51
	10/08/19	ASQ SE-2	63.78	61.51	-	61.51
	02/10/20	ASQ-3	63.78	61.51	-	61.51
Total			<u>\$ 14,408.59</u>	<u>8,637.31</u>	<u>615.10</u>	<u>9,252.41</u>

**Exhibit B**Report on Special Investigation of the  
Family, Inc.ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
AP	01/16/20	ASQ SE-2	\$ 63.78	61.51
AQ	03/04/20	ASQ-3	63.78	61.51
AR	08/15/19	ASQ-3	122.16	61.51
	11/01/19	ASQ-3	63.78	61.51
	02/20/20	ASQ-3	63.78	61.51
	07/17/20	ASQ-3	63.78	61.51
	08/20/20	ASQ SE-2	63.78	61.51
AS	07/13/20	ASQ-3	63.78	61.51
	08/20/20	ASQ SE-2	63.78	61.51
AT	10/17/19	ASQ-3	63.78	61.51
	02/06/20	ASQ SE-2	63.78	61.51
	03/12/20	ASQ-3	63.78	61.51
AU	09/24/19	ASQ-3	122.16	61.51
AV	07/23/19	ASQ-3	122.16	61.51
AW	03/04/20	ASQ-3	63.78	61.51
AX	04/06/20	ASQ SE-2	63.78	61.51
	06/05/20	ASQ-3	63.78	61.51
AY	06/11/20	ASQ-3	63.78	61.51
AZ	08/10/20	ASQ SE-2	63.78	61.51
	07/13/20	ASQ-3	63.78	61.51
BA	07/10/19	ASQ-3	63.78	61.51
	09/12/19	ASQ-3	122.16	61.51
	10/07/19	ASQ-3	122.16	61.51

Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
	11/08/19	ASQ-3	63.78	61.51
	02/13/20	ASQ-3	63.78	61.51
	04/25/20	ASQ SE-2	63.78	61.51
BB	09/26/19	ASQ-3	122.16	61.51
BC	07/11/19	ASQ-3	122.16	61.51
	10/24/19	ASQ-3	63.78	61.51
	04/02/20	ASQ-3	63.78	61.51
	04/09/20	ASQ SE-2	63.78	61.51
BD	07/11/19	ASQ SE-2	122.16	61.51
	03/06/20	ASQ-3	63.78	61.51
BE	06/17/20	ASQ-3	63.78	61.51
BF	08/13/19	ASQ-3	122.16	61.51
	08/27/19	ASQ SE-2	122.16	61.51
	02/11/20	ASQ-3	63.78	61.51
	05/19/20	ASQ SE-2	63.78	61.51
	06/10/20	ASQ-3	63.78	61.51
BG	07/18/19	ASQ-3	122.16	61.51
BH	09/27/19	ASQ SE-2	122.16	61.51
BI	07/08/19	ASQ-3	122.16	61.51
	07/29/19	ASQ-3	122.16	61.51
	10/30/19	ASQ-3	63.78	61.51
	03/02/20	ASQ SE-2	63.78	61.51
	04/29/20	ASQ SE-2	63.78	61.51
BJ	10/03/18	ASQ-3	122.16	61.51

**Exhibit B**

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Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
BK	11/13/19	ASQ-3	63.78	61.51
	01/28/20	ASQ SE-2	63.78	61.51
	04/30/20	ASQ-3	63.78	61.51
BL	11/26/19	ASQ SE-2	63.78	61.51
	12/10/19	ASQ-3	63.78	61.51
	06/16/20	ASQ-3	63.78	61.51
	06/18/20	ASQ SE-2	63.78	61.51
BM	10/30/19	ASQ SE-2	63.78	61.51
BN	09/30/19	ASQ-3	122.16	61.51
	10/14/19	ASQ SE-2	63.78	61.51
BO	07/11/19	ASQ SE-2	122.16	61.51
BP	07/29/19	ASQ SE-2	122.16	61.51
	10/30/19	ASQ-3	63.78	61.51
	03/02/20	ASQ-3	63.78	61.51
	04/29/20	ASQ SE-2	63.78	61.51
BQ	11/08/19	ASQ-3	63.78	61.51
BR	08/02/18	ASQ-3	61.51	61.51
BS	05/27/20	ASQ-3	63.78	61.51
	06/03/20	ASQ SE-2	63.78	61.51
BT	07/25/19	ASQ-3	122.16	61.51
	09/05/19	ASQ-3	122.16	61.51
BU	06/23/20	ASQ-3	63.78	61.51

Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
BV	07/30/20	ASQ SE-2	63.78	61.51
BW	09/05/19	ASQ-3	122.16	61.51
BX	08/27/19	ASQ-3	122.16	61.51
	09/26/19	ASQ SE-2	122.16	61.51
	01/29/20	ASQ SE-2	63.78	61.51
	06/17/20	ASQ-3	63.78	61.51
	08/05/20	ASQ SE-2	63.78	61.51
BY	07/09/19	ASQ SE-2	122.16	61.51
	12/19/19	ASQ-3	63.78	61.51
BZ	11/26/19	ASQ-3	63.78	61.51
	02/14/20	ASQ SE-2	63.78	61.51
	05/21/20	ASQ-3	63.78	61.51
CA	04/15/20	ASQ-3	63.78	61.51
	06/19/20	ASQ-3	63.78	61.51
	07/27/20	ASQ SE-2	63.78	61.51
CB	04/16/20	ASQ-3	63.78	61.51
	07/30/20	ASQ-3	63.78	61.51
CC	07/17/20	ASQ SE-2	63.78	61.51
	07/20/20	ASQ-3	63.78	61.51
CD	07/31/19	ASQ-3	122.16	61.51
CE	09/24/18	ASQ-3	61.51	61.51
CF	07/01/20	ASQ SE-2	63.78	61.51
	07/07/20	ASQ-3	63.78	61.51



Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
CG	09/24/18	ASQ-3	61.51	61.51
CH	09/26/19	ASQ SE-2	122.16	61.51
CI	10/03/18	ASQ-3	122.16	61.51
CJ	07/02/19	ASQ SE-2	122.16	61.51
	07/30/19	ASQ-3	122.16	61.51
	09/17/19	ASQ-3	122.16	61.51
	01/21/20	ASQ-3	63.78	61.51
	06/16/20	ASQ SE-2	63.78	61.51
	08/04/20	ASQ-3	63.78	61.51
CK	06/09/20	ASQ-3	63.78	61.51
CL	08/27/19	ASQ-3	122.16	61.51
CM	09/10/19	ASQ SE-2	122.16	61.51
	09/24/19	ASQ-3	122.16	61.51
	03/17/20	ASQ SE-2	63.78	61.51
	04/01/20	ASQ SE-2	63.78	61.51
	04/01/20	ASQ-3	63.78	61.51
	06/18/20	ASQ-3	63.78	61.51
CN	02/28/20	ASQ-3	63.78	61.51
	06/08/20	ASQ-3	63.78	61.51
	08/31/20	ASQ SE-2	63.78	61.51
CO	07/08/19	ASQ-3	122.16	61.51
CP	05/14/20	ASQ SE-2	63.78	61.51
	12/19/19	ASQ-3	63.78	61.51
	03/11/20	ASQ-3	63.78	61.51

Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
	04/29/20	ASQ-3	63.78	61.51
	07/27/20	ASQ-3	63.78	61.51
	09/17/20	ASQ-3	63.78	61.51
CQ	07/29/19	ASQ SE-2	122.16	61.51
	04/29/20	ASQ SE-2	63.78	61.51
CR	10/30/19	ASQ-3	63.78	61.51
	03/02/20	ASQ-3	63.78	61.51
CS	08/15/19	ASQ-3	122.16	61.51
	10/21/19	ASQ-3	63.78	61.51
CT	06/19/20	ASQ-3	63.78	61.51
	06/30/20	ASQ SE-2	63.78	61.51
CU	10/08/18	ASQ-3	122.16	61.51
	12/02/19	ASQ-3	63.78	61.51
	03/26/20	ASQ-3	63.78	61.51
	04/21/20	ASQ SE-2	63.78	61.51
	06/11/20	ASQ-3	63.78	61.51
	06/29/20	ASQ SE-2	63.78	61.51
CV	01/27/20	ASQ-3	63.78	61.51
CW	07/23/19	ASQ-3	122.16	61.51
CX	07/31/19	ASQ SE-2	122.16	61.51
	02/26/20	ASQ-3	63.78	61.51
	03/11/20	ASQ SE-2	63.78	61.51

**Exhibit B**

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Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
CY	08/07/19	ASQ-3	122.16	61.51
	09/11/19	ASQ SE-2	122.16	61.51
	08/05/20	ASQ-3	63.78	61.51
CZ	09/23/20	ASQ SE-2	63.78	61.51
DA	08/09/19	ASQ-3	122.16	61.51
	09/27/19	ASQ-3	122.16	61.51
	11/08/19	ASQ-3	63.78	61.51
	04/22/20	ASQ-3	63.78	61.51
	07/31/20	ASQ-3	63.78	61.51
	08/06/20	ASQ SE-2	63.78	61.51
DB	08/20/19	ASQ-3	122.16	61.51
DC	07/31/19	ASQ SE-2	122.16	61.51
DD	09/05/19	ASQ-3	122.16	61.51
	01/22/20	ASQ-3	63.78	61.51
	08/13/20	ASQ-3	63.78	61.51
DE	07/01/20	ASQ-3	63.78	61.51
	08/10/20	ASQ SE-2	63.78	61.51
DF	07/09/19	ASQ-3	122.16	61.51
DG	08/22/19	ASQ SE-2	122.16	61.51
	09/23/19	ASQ-3	122.16	61.51
	01/02/20	ASQ SE-2	63.78	61.51
	01/16/20	ASQ-3	63.78	61.51
	06/25/20	ASQ-3	63.78	61.51
DH	07/18/19	ASQ SE-2	122.16	61.51

Report on Special Investigation of the  
Family, Inc.

ECI Surveys Billed to Medicaid  
For the Period July 1, 2017 through May 31, 2021

<b>Client</b>	<b>Survey Date</b>	<b>Survey</b>	<b>Billing Amount Submitted</b>	<b>Amount Paid by MCO</b>
DI	07/11/19	ASQ-3	122.16	61.51
	10/29/19	ASQ-3	63.78	61.51
DJ	11/11/19	ASQ-3	63.78	61.51
	08/20/20	ASQ-3	63.78	61.51
	09/17/20	ASQ-3	63.78	61.51
DK	12/11/19	ASQ-3	63.78	61.51
DL	07/19/19	ASQ-3	122.16	61.51
	02/18/20	ASQ-3	63.78	61.51
DM	06/05/20	ASQ-3	63.78	61.51
DN	10/29/18	ASQ-3	122.16	61.51
DO	07/18/19	ASQ SE-2	122.16	61.51
	05/06/20	ASQ-3	63.78	61.51
	07/17/20	ASQ SE-2	63.78	61.51
Total			<u>\$ 14,307.21</u>	<u>10,764.25</u>

Report on Special Investigation of  
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Iowa Department of Public Health

Staff

This special investigation was performed by:

Melissa J. Finestead, CFE, Manager  
Ryan T. Jelsma, CFE, Senior Auditor II  
Ridge G. Nennig, Staff Auditor  
Julius Cooper, Assistant Auditor



Annette K. Campbell, CPA  
Deputy Auditor of State

## **Appendix**

Report on Special Investigation of  
Billings Submitted by FAMILY, Inc.  
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Iowa Department of Public Health

BARKDOLL & VONAHSEN, LLC

May 4, 2022

VIA EMAIL (Ryan.Jelsma@AOS.IOWA.GOV)

Ryan Jelsma  
Office of Auditor of State  
Lucas State Office Building  
321 E. 12<sup>th</sup> St.  
Des Moines, IA 50319

RE: FAMILY, Inc.'s Written Response to Allegations

Dear Mr. Jelsma:

Thank you for the opportunity to respond in writing to the allegations raised at the April 27, 2022, meeting ("Meeting") between the Iowa State Auditor's Office and FAMILY, Inc. ("FAMILY").

As discussed at the Meeting, FAMILY, Inc. is an Iowa Code 504 nonprofit corporation created in 2007. It is the successor organization to a long line of family services providers which have been in operation since 1991.

FAMILY offers public health and family support services to women, children and families in homes, shelters and community settings. Throughout the years, FAMILY has been the recipient of several sources of funding, and specifically relevant to the Meeting, FAMILY was awarded contracts by Thriving Families Alliance ("TFA") to perform services related to the Early Child Iowa program ("ECI") and the Maternal, Infant and Early Childhood Home Visiting program ("MIECHV"). As FAMILY is not a recipient of state grant funds, the relationship between FAMILY and TFA is governed by the ECI Contract and the MIECHV Contract. Notably, nowhere in the ECI Contract are the IDPH General Conditions incorporated by reference, and in fact, the ECI Contract contains an integration clause (*See* ECI Contract section 8.13) preventing the parties from relying on representations that are not a part of the Contract.

Importantly, on issues where the ECI and MIECHV Contracts are vague and/or silent, where the technical guidance is vague and/or silent, and where the laws and regulations are vague and/or silent, FAMILY looks to the Iowa Department of Public Health ("IDPH") for technical guidance, as the IDPH is the entity with oversight into these programs.

**BACKGROUND ON THE MIECHV CONTRACT**

With respect to the MIECHV Contract, FAMILY's contractual obligations are contained within the MIECHV Contract and any documents referenced in the MIECHV Contract. For a fee, FAMILY was contracted to provide maternal, infant, and early childhood home visitation



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programs using the Parents as Teachers model for home visitations. These contracts were first entered into prior to Kimberly Kolakowski's tenure as executive director of FAMILY and were renewable every 12-15 months.

The MIECHV Contract was different from all other contracts with TFA, in that it was federally funded, there were different requirements in documentation, visit frequency, training, and use of personnel.

FAMILY did not receive money up front for these services, but rather, in order to receive payment on these contracts, FAMILY was required to submit a claim form to TFA specifically itemizing reimbursable expenses. As part of the recent contract termination with TFA, FAMILY has submitted years of expense reimbursement requests carefully itemizing each and every dollar requested to the specifications of TFA. To the best of FAMILY's knowledge, these expense reimbursement requests do not bill TFA for administering any ASQ as part of the MIECHV program.

#### **BACKGROUND ON THE ECI CONTRACT**

With respect to the ECI Contract, FAMILY's contractual obligations are contained within the ECI Contract, and the documents referenced in the ECI Contract. For a fee, FAMILY was contracted to provide long term home visitation for families with children using the Parents as Teachers model for home visitations. FAMILY was awarded the ECI Contract at least in part, because FAMILY had been providing similar family support services since 1991<sup>1</sup>.

The ECI and MIECHV Contracts were subject to the same claims process, and as a result of the recent contract termination, FAMILY has provided years of expense reimbursement requests to TFA. To the best of FAMILY's knowledge, these expense reimbursements do not bill TFA for administering any ASQ as part of the ECI program.

#### **RECORDKEEPING REQUIREMENTS**

Throughout the years as contractor with TFA, FAMILY has been required to and has endeavored to maintain records pursuant to the MIECHV and ECI Contracts, and as directed by TFA and IDPH personnel. Specifically for the MIECHV Contract, FAMILY maintained records in at least three separate databases. These included the Iowa Data Application and Integration Solutions for the Early Years ("DAISEY") database, the Scorecard Database, and a separate internal database. For the ECI Contract, FAMILY maintained records in at least DAISEY and a separate internal database. Prior to electronic records requirements, FAMILY also maintained paper files.

Families may be served by multiple programs at FAMILY. Each program director has the responsibility for keeping documentation in compliance with the program requirements. FAMILY has attempted to maintain separate electronic and paper files for each program, and FAMILY is

<sup>1</sup> FAMILY, Inc. has only been a standalone organization since 2007 but these services were provided through FAMILY's predecessor organizations.



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unaware of any mixing of files. Ms. Kolakowski does not recall any specific discussion of files being intermingled as alleged by a MCH consultant chart audit, but had any such information been conveyed, FAMILY would have attempted to rectify any such deficiencies.

**MEDICAID “DOUBLE BILLING” ALLEGATION**

FAMILY has long practiced the Parents as Teachers model of home visitation. The service of home visitation consists of a structured visit with the parent and child, with a specific curriculum, activities, and resource connection. Developmental screenings help home visitation personnel assess progress and guide curriculum, but they are not part of the specific service FAMILY has been contracted to provide. Indeed, Tool FF of the Early Childhood Iowa Ready School Funds Family Support and Parent Education, states the ASQ may performed by a parent, another provider, or the home visiting program staff. Tool FF does not require FAMILY to administer the ASQ, only that an ASQ must be administered.

As an example, FAMILY maintains clients that administer their own ASQ prior to FAMILY’s involvement with the child. For these clients, FAMILY receives the ASQ data and inputs it into DAISEY but does not bill for the service. Additionally, when FAMILY staff member administers an ASQ, extra time is allotted to the beginning or end of a standard home visitation time period, specifically for the purpose of completing the ASQ. The ASQ is not considered part of the home visit and is an extra service. The ASQ could therefore be considered a “prerequisite” to the Parents as Teachers model. FAMILY could have refused to administer any ASQs under its MIECHV and ECI Contracts, instead relying on parents and other providers. Due to the voluntary nature and the perceived separation from the contracted-for services, the ASQ would not be considered “program income” as it was not directly generated by a contract supported activity or earned as a result of the contract agreement.

For many years, FAMILY has been a qualified Medicaid provider. The ASQ is a legitimate Medicaid billable service, and FAMILY, when it has provided this service, has billed Medicaid for this service<sup>2</sup>. This practice has been scrutinized for many years, through multiple audits, chart audits, and site visits. The State of Iowa has been aware of this practice for many years through its billing database, TAVHealth and later Signify Community. Given that FAMILY views the ASQ as an extra service and not part of the services it was contracted for, and given the State of Iowa did not provide any guidance on this issue after many years of being aware of the issue, FAMILY believed it was in compliance with its contracts and all relevant law when it billed Medicaid for the additional ASQ service at all relevant times.

It is clear there was a lack of clarity surrounding this issue, even for IDPH personnel. On or about December 2019, IDPH conducted a joint chart audit with FAMILY personnel. In attendance at that joint chart audit was Analisa Pearson, IDPH employee. As a result of the December 2019 Joint Chart Audit, IDPH noted FAMILY was having documentation issues with its ASQs related to good recordkeeping. On a follow-up site visit on February 3, 2020, Ms.

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<sup>2</sup> Mr. Jelsma identified several instances where FAMILY performed ASQs but did not ultimately bill Medicaid for those services. FAMILY identified these instances to likely be due to turnover and transition in its accounting department.

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Pearson mentioned to a FAMILY program director that FAMILY should stop billing Medicaid for ASQs for the MIECHV program, as it was a federally funded program and billing ASQs might constitute “double billing.” Ms. Pearson also made clear that this was not an issue for any of FAMILY’s other programs, and they could continue to bill Medicaid for ASQs for those other programs.

When it was made aware of this issue, FAMILY immediately took steps to stop billing Medicaid for any ASQ’s related to the MIECHV program.<sup>3</sup> FAMILY did so because this was the first time this issue had been brought to its attention, and because it was brought to its attention by its technical advisor.

On or about April 12, 2021, Janet Horras called a meeting with FAMILY, TFA and herself in attendance. At that meeting, Ms. Horras asked FAMILY if it was still billing ASQs to Medicaid and Ms. Kolakowski responded that FAMILY was still billing ASQs to Medicaid but not under the MIECHV program.

In a subsequent letter dated April 15, 2021, Ms. Horras alleged, without citation to law or regulation, and in direct contravention to what had been told to FAMILY by Analise Pearson on February 3, 2020, that “billing a public insurance provider for developmental screenings, provided by a home visiting program, may only occur in limited circumstances and must be clearly stated in your contract for the provision of the home visiting program.” FAMILY could not have been aware of this requirement, as it does not exist in contract, law, or regulation. Never before had IDPH alleged that billing Medicaid for developmental screenings was considered “program income,” and never before did IDPH allege this specific interpretation of the MIECHV Contract and the General Conditions. Nonetheless, due to the position taken by Ms. Horras and due to the lack of clarity in contract, law, or regulation, FAMILY took steps to immediately stop Medicaid billing for ASQs under the ECI Contract, as it had already done under the MIECHV Contract.

Finally, the law and regulations on this issue were so unclear that the IDPH issued a new policy, effective April 1, 2022, dealing directly with this issue. *See* Iowa MIECHV & HOPES-HFI Operations Manual, Policy 28, Program Income, effective April 1, 2022. Although the IDPH alleges “the policy is new, but program income language is already included in the State General Conditions[,]” it is clear that such a policy was needed to clarify this exact situation:

For example, Agency K, is an approved Medicaid provider in addition to being a MIECHV home visiting contractor. Agency K requests to bill Medicaid for developmental screenings completed on MIECHV children during the provision of the MIECHV program. IDPH must first approve Agency K billing Medicaid for those services as they are a key component of the MIECHV program and are already being paid for with your MIECHV funds. If IDPH approves Agency K, billing Medicaid for the MIECHV funded services, Agency K will need to declare any Medicaid funds as program income. IDPH in turn will reduce the MIECHV award by an equivalent amount to offset the program income.

<sup>3</sup> Although immediate steps were taken, some ASQ’s were already in the billing pipeline and may show as being billed after that date.

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*Iowa MIECHV & HOPES-HFI Operations Manual, page 57, Policy # 28: Program Income, effective April 1, 2022.*

This policy is so specific and so responsive to the general lack of information about program income, Medicaid billing, and developmental screenings, it strains credulity to believe that IDPH created this policy for any other circumstance except the one at hand. If in fact the General Conditions were clear enough to give notice of the expectations surrounding Medicaid billing and developmental screenings, there would be no need to promulgate such a policy. However, as noted above, there was a clear lack of clarity surrounding this issue, and thus, IDPH was correct in issuing the new policy. FAMILY should not be punished *ex post facto* for a situation for which IDPH itself could not provide guidance until one year after the issue was raised.

FAMILY has acted as a transparent, good faith partner to TFA and to IDPH during its time as a subcontractor to TFA. When made aware of the issues of program income, Medicaid billing and developmental screenings as they related to the MIECHV Contract, FAMILY ceased billing Medicaid for administering ASQs. When made aware of IDPH's position on the issues of program income, Medicaid billing and developmental screenings as they relate to the ECI Contract, FAMILY again ceased billing Medicaid for administering ASQs. At all relevant times, FAMILY has responded to audits, chart audits, and site visits with transparency and honesty. FAMILY never made any attempts to hide the fact it was billing ASQs from TFA or the State. When asked to provide data on FAMILY's Medicaid billing surrounding ASQs FAMILY handed over data from the periods requested to the State and to TFA.

FAMILY continues to strive to serve the citizens of Iowa in an honest and transparent manner. We hope this written submission helps clarify FAMILY's position. Please do not hesitate to contact me with any questions or concerns.

Regards,



Homero E. Vela

cc: FAMILY, Inc. (by E-Mail)