



Proposal To:

District of Columbia Department of Human Services

For:

SNAP CASE MANAGEMENT AND PROGRAM INTEGRITY SYSTEM



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PROPOSAL TO DISTRICT OF COLUMBIA DHS

Pondera is proposing a SNAP Case Management and Program Integrity System to District of Columbia Department of Human Services.

This document details the scope and requirements for a Software-as-a-Service (SaaS) subscription of Pondera's investigative case management solution (CaseTracker™) integrated with its fraud detection solution (FraudCaster®; CaseTracker and FraudCaster, collectively, the "System") to support the District of Columbia's Department of Human Services (DHS) program integrity efforts.

CaseTracker offers comprehensive case management for investigators. CaseTracker aids in effective referral assessment, case development, referral outcome tracking, and the utilization of investigative outcome data to identify trends and best practices. Secure content management, flexible workflow and approvals, and comprehensive reporting are designed to improve investigative efficiencies and success rates.

To aid the DHS investigative team in identifying and working the highest value cases, we are also offering our FraudCaster solution which uses historical program data to train rule-based flags and prediction models to identify transaction anomalies as well as patterns, clusters, and trends that may indicate fraud or other collusive activities.

Figure 1: Integrated case management and program integrity system

Case Summary
ID 0347931

Case Details

Case ID:	0347931	Description:	Case Created from FDaaS for 74983035
Case Category:		Case Status:	
Case Team:	Joy Friendly, Mark Hamill	Case Status Date:	
Primary Subject:	Dhaka Family Mart		
Subject Type:	Retailer		

Involved Subjects

SUBJECT	EMAIL	PHONE
<input type="checkbox"/> Dhaka Family Mart	rottenteeth@dentist.com	(916) 555-1212
<input type="checkbox"/> Dhaka Family Mart	whiteteeth@dentistry.com	(916) 555-1212

Alerts

ALERT	SUBJECT	RANK	BATCH	TIER
<input type="checkbox"/> Low Market Engagement	Mindful Dentistry, LLC	0		
<input type="checkbox"/> High Market Engagement	Mindful Dentistry, LLC	2		

Related Cases

CASE ID	CATEGORY	SUBJECT	STATUS	CREATED
<input type="checkbox"/> 013419034	Investigation	Eventually Get There	Preliminary	June 17, 2018
<input type="checkbox"/> 1234094772	Investigation	Eventually Never Again	Hearing	April 1, 2018

Most Billed Procedure Codes

CODE	DESCRIPTION	BILLED
E00-E07	Disorders of thyroid gland	1234
E00-E07	Disorders of thyroid gland	1234

Financials

Overpayment
Sanction
Costs

WORKLIST

008235
000824
00348795

1.0 CASETRACKER

The volume of referrals that DHS assesses and investigates annually necessitates a mechanism to intake, assess, assign, and monitor referrals as they move through the investigative life cycle of the Supplemental Nutrition Assistance Program (SNAP). Moreover, the scope and level of complexity associated with SNAP cases demands tools to manage the investigative process (e.g. reports of interviews, documents collected, case actors, time and expense tracking, etc.) to maximize efficiency.

CaseTracker aids in effective referral assessment, case development, prosecution/hearing referral outcome tracking, and the utilization of investigative outcome data to identify trends and best practices. Pondera's CaseTracker was designed by investigators who understand these challenges and the features and functions required to maximize successful case outcomes.

Table 1 details the functions that are provided with a CaseTracker subscription for up to 20 users:

Table 1: Proposed Case Management Functions

Activity	Description	Quantity
Intake Form	The intake form is used to record new cases.	1
Workflow	Workflow rules are used to optimize the business process. A workflow rule is any logic that triggers a change in the status of the case or an email notification.	Up to 2
Case Record	The case record will contain all of the standard case functionality including those items in Case Details tab.	No Limit
Case Details Overview	This tab displays information captured on the intake form (excluding sub-forms). It will also include up to 25 other fields that may be completed during the case lifecycle (closure reason, recommended outcome, etc.).	No Limit
Case Activity	<ul style="list-style-type: none"> Record Notes Record To-Do's with reminders Assign To-Do's to a CaseTracker user other than case owner Send and receive emails from within a case. E-mails may have 	No Limit
Case Entities	Users add multiple entities to a case to record various entity types (i.e. customer, subject, witness, etc.). Each of the unique forms may have up to 50 data fields.	Up to 3
Case Files	Attach any sort of electronic document to the case (fax, scanned document, MS Word, etc.) with a maximum individual attachment size of 200 MB	No Limit
Comments	Users can create and manage comments related to a case. Users can subscribe to notifications when comments are added.	No Limit
General Case Features	Users can assign a case by selecting an owner from the pick list and the ability to print the case file. There is also case history that will display an audit trail of changes made to the case record.	No Limit
Case Record Forms	Forms can be deployed within the case file by users to record information. Forms are used for data sets that must be recorded more than once during the case lifecycle. For example: An expense form could be deployed to track different expense items. An interview form can be deployed to record every interview conducted. This also aids in overall case data integrity.	Up to 5
Maintenance	Pondera software provides the following maintenance functions: <ul style="list-style-type: none"> Add, modify, or delete users, select their access level and notify them by email of their username and password Add, modify, or delete category items (issues, products, etc.) 	No limits

Activity	Description	Quantity
	<ul style="list-style-type: none"> Add, modify, or delete workflow rules (for example: users may change timing of notifications) Add, modify, or delete email standard responses 	
Access Controls	Access controls restrict functions and data available to groups of users. For example, information may be restricted based on the user's department. In that case, the user only sees cases and report information related to that department. Other examples could include case type, location, severity, etc.	Up to 3 roles
Configured and Ad-Hoc Reporting	CaseTracker software includes a standard reporting package. This includes pre-built reports plus an ad-hoc reporting tool integrated in CaseTracker that will be populated with reportable field values. Pondera will provide reports based on the Agency's requirements, such as audit or investigation outcomes, progress of prosecution referrals and hearings, and performance metrics to monitor the effectiveness of program integrity efforts. Custom reports can be built by users using the Ad-hoc reporting tool.	Up to 3 pre-built reports
Automated steps	Built in processes to allow users to configure specific functions including transferring a complaint to a case, case assignment, set notifications for updates related to records submissions, reporting dates, field population, dependencies, form indicators etc.	Up to 8 business rules
Search options on Advanced Search and Case View	Ability for users to search within CaseTracker to identify potentially related cases or providers. If sampling is conducted as part of an investigation, the search function can be utilized to identify samples containing the same member and of services.	Up to 5 search Criteria
Time & Expense Tracking	CaseTracker includes for users a standard employee time and case expense tracking functionality. This facilitates the seamless creation of employee routine timesheets and investigative costs.	No limit

CaseTracker also includes extensive search and reporting capabilities. This allows users to search for information across cases to identify common attributes among otherwise unassociated cases. Standard reports, including the 366B report shown in Figure 2, display information on numbers of cases assigned to investigators, average time to completion, and other common reporting metrics.

Time and Expense Tracking is also included in CaseTracker, which allows management to track progress by branch, individual investigator, activity type, and case type. This is displayed in Figure 3.

Figure 2: 366B Reporting Detail from the Case Management System

Start Date

1/1/2019

End Date

3/31/2019

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FNS 366B - Program Activity Statement

Fair Hearings

Fair Hearings	(a) Hearings Requested	(b) Hearings Held	(c) Decisions Upheld	(d) Decisions Reversed	(e) Decisions Overdue	(f) Withdrawn Requests
Activity	6	8	2	2	0	1

Fraud Investigations

Fraud Investigations	(a) Evidence Found To Reduce or Deny Benefits Eligibility - Fraud	(b) No Evidence Found To Reduce or Deny Benefits Eligibility - Fraud	(c) Resulted In Referral For ADH or Prosecution Eligibility - Fraud	Avg (d) Avg # of days per concluded investigation - Eligibility Fraud	(e) Open Investigations Eligibility Fraud	(f) Resulted In Referral for ADH or Prosecution Trafficking	(g) No Referral for ADH or Prosecution Trafficking	(h) Avg # of days per concluded investigation Trafficking	(i) Open Investigations Trafficking	(j) Combined Investigator Hours
CASES/DAYS/HOURS	16	5	4	0.67	0	0	30	1.26	35	480.848

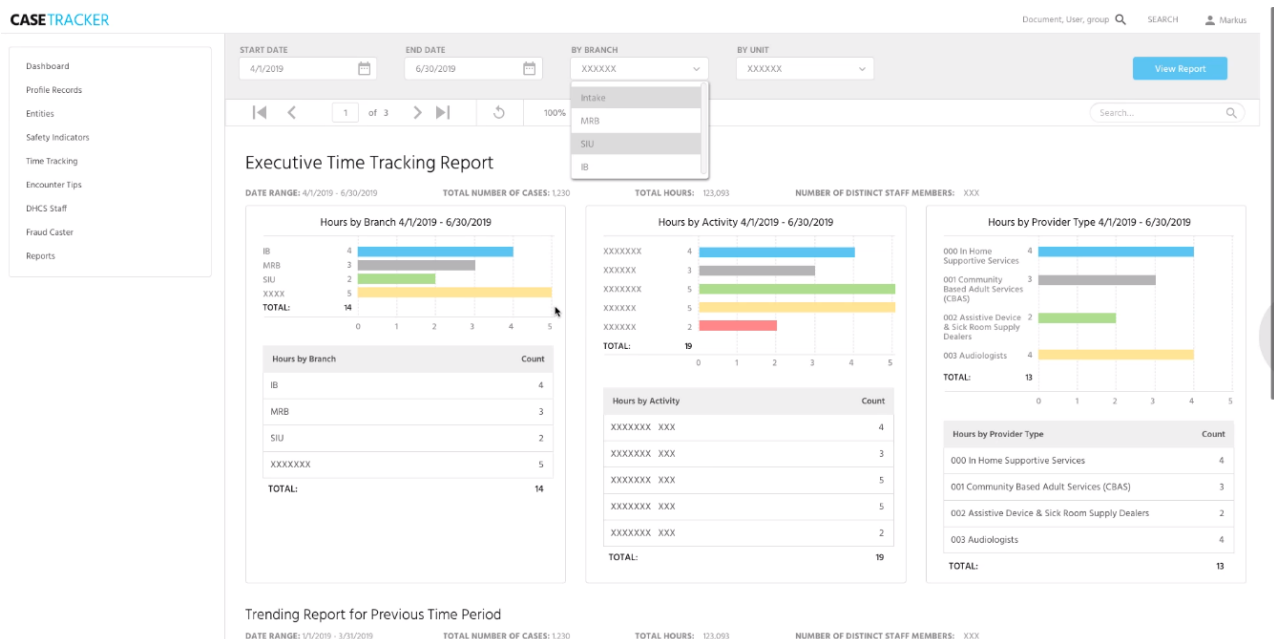
Administrative Disqualification Hearings

ADMINISTRATIVE DISQUALIFICATION HEARINGS	(a) ADH Concluded, Ind Disqualified Eligibility Fraud	(b) Waiver Signed Eligibility Fraud	(c) ADH Concluded, Ind Not Disqualified Eligibility Fraud	(d) Amount Subject to Claim Eligibility Fraud	(e) ADH Concluded, Ind Disqualified Trafficking	(f) Waiver Signed Trafficking	(g) ADH Concluded, Ind Not Disqualified Trafficking	(h) Amount Subject to Claim Trafficking	(i) Combined Referred Ind Awaiting Scheduling 91-160 days	(j) Combined Referred Ind Awaiting Scheduling 161 days plus	(k) Decision Notices Overdue
INDIVIDUALS/NOTICES	2	3	1	456,456.00	0	1	0	0.00	0	0	3.00

Prosecutions

Prosecutions	(a) Prosecution Concluded Ind Disqualified Eligibility Fraud	(b) DCA Signed Ind Disqualified Eligibility Fraud	(c) Prosecution Concluded Ind Not Disqualified Eligibility Fraud	(d) Amount Subject to Claim Eligibility Fraud	(e) Prosecution Concluded Ind Disqualified Trafficking	(f) DCA Signed Ind Disqualified Trafficking	(g) Prosecution Concluded Ind Not Disqualified Trafficking	(h) Amount Subject to Claim Trafficking	(i) Avg # of Days per Concluded Prosecution
INDIVIDUALS/DAYS	1	1	0	402,600.00	186	0	0	0.00	-0.14

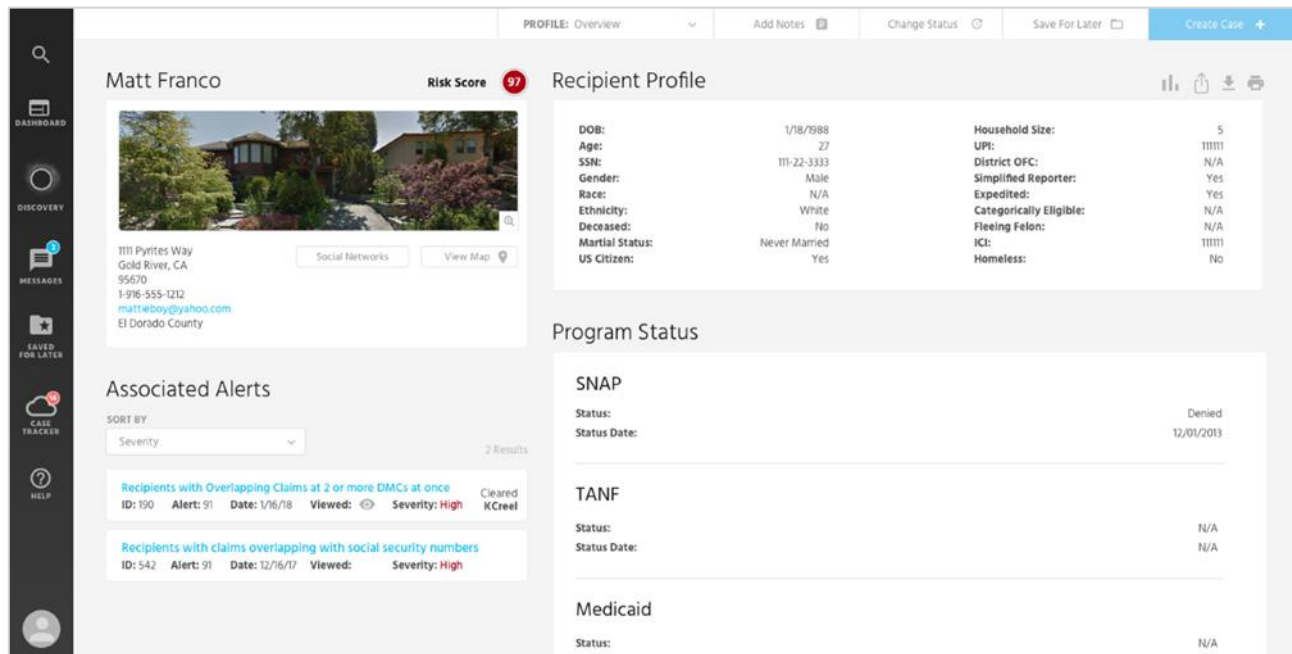
Figure 3: Executive Time Tracking Report



2.0 FRAUDCASTER

FraudCaster analyzes referrals and cases using DHS data and pre-integrated third-party data sets for both businesses and individuals. FraudCaster displays results via an intuitive dashboard that includes alerts, interactive geospatial maps, and profiles for program participants.

Figure 4: FraudCaster dashboard



Pondera will configure FraudCaster specifically for the DHS including alerts, geospatial maps, and profiles with fraud indicators. FraudCaster will leverage recipient and retailer data from the DHS' own data systems. We recommend an initial output file for the previous three years.

FraudCaster is a force multiplier for any program integrity unit. With limited resources and a constant influx of new referrals, DHS managers and investigators will leverage FraudCaster to understand recipient and retailer risk as well identify prior behaviors and patterns of fraudulent behavior. This leads to the assignment and prioritization of the true *highest value* cases.

Further, to increase the success of the investigative life cycle, Pondera's CaseTracker is designed to monitor and track outcomes of investigations and individuals suspected of intentional program violations (IPV). The pre-integrated software modules provide a constant feedback loop between the analytics and case outcomes so that data and trend analysis can continually assist in the tuning of fraud alerts and models. Together, FraudCaster and CaseTracker enable the DHS investigators to choose the highest value leads to pursue, manage their cases effectively and efficiently, and monitor outcomes to inform future investigative efforts.

Table 2 details the minimum FraudCaster functions that will be extended to all FraudCaster users (unlimited DHS users permitted).

Table 2: FraudCaster Base Functionality

Activity	Description	Quantity
Recipient Validation	FraudCaster analyzes current recipients to identify areas of risk such as shared values (such as home address, IP address, e-mail address), deceased participants, excessive balance inquiries or multiple EBT replacement cards, behavioral pattern matching, and other anomalies. Results will trigger automated alerts and will populate the recipient head of household (case) profiles.	Up to 70,000 Recipients
Retailer Validation	FraudCaster analyzes retailers through the System Validation Module to identify areas of risk such as unusual travel and purchasing patterns. This aids in the identification of clusters of potential trafficking recipients. Results trigger alerts and populate the retailer profiles.	Up to 2,000 profiles
Procedural alerts	FraudCaster also checks anomalies. Results trigger alerts in the dashboard and automatically populate recipient and retailer profiles.	Up to 20 alerts
Geospatial Analysis	FraudCaster geocodes recipient and retailer data for use in geospatial analysis to analyze relationships across participants.	Up to 3 maps
Street View	FraudCaster provides street-level mapping to view recipient and retailer locations from within the dashboard.	All recipient and retailer profiles
Data Matching	FraudCaster matches DHS data against a list of suspended or banned retailers and/or recipients and checks for eligibility risks such as duplicate State participation by matching against PARIS data.	All program participants
Scorecard	The Scorecard provides users with ready access to head of household (HOH) recipients currently identified by the Pondera Risk Score.	1 Recipient (HOH) Scorecard

The functions described in Table 2 will detect and flag anomalous and suspect activity. In addition, they will help to identify high-risk groups of recipients. For example, recipients who travel long distances to retailers and also display suspect activity may trigger higher risk scores.

3.0 SECURITY, TRAINING, AND SUPPORT

Your CaseTracker and FraudCaster subscriptions include the following deliverable items:

- **System Security Plan (SSP)** – The DHS and Pondera will mutually agree upon an SSP to govern this project. The SSP will include information on how data is transported, secured, and purged. It will also describe how data will be used in crossmatches and which Pondera staff will have access to data and for what purpose. The SSP will be delivered in Microsoft Word format and approved by the DHS.
- **User Training** – Pondera will conduct on-site training for the DHS management and staff. Pondera will provide one (1) management session and up to two (2) staff sessions as part of the project. Pondera will conduct the training and provide all required course materials. Initial training will be conducted onsite; other sessions may be onsite or virtual.
- **Support** – Pondera will provide technical and user support Monday through Friday 8:00 am to 5:00 pm ET. Users will also have access to a support ticket system to log issues or bugs 24x7x365.

4.0 DHS OBLIGATIONS

- DHS will make technical and functional staff available to Pondera as needed.
- DHS will designate key system stakeholders within seven (7) days of the prime contract effective date.
- DHS will assign a technical resource to Pondera to answer questions about program data.

5.0 PRICING

The cost of the project is listed in the table below. This begins at contract signing and includes implementation, the cost of software subscriptions for Pondera FraudCaster and CaseTracker, and ongoing training and support.

Description	Quantity	Year 1
CaseTracker 12-Month Subscription (Includes 366B and ROI reporting, workflows, and field designations)	1	\$130,000
FraudCaster 12-Month Subscription (Includes ongoing data analytics, security plan, and user trainings)	1	\$165,000
YEAR 1 TOTAL		\$295,000*

***Subsequent years will be subject to a 5% annual cost increase year-over-year.**

6.0 ASSUMPTIONS

- Pondera and the DHS will execute a data sharing agreement within 30 days of the effective date of the prime contract.
- Pondera will not provide access to the FraudCaster dashboard until the SSP is signed by both parties.
- The parties will mutually agree on the project schedule within 10 business days of the effective date of the prime contract. Any changes to the project schedule will be mutually agreed in writing. Project delays solely due to the DHS action or inaction may result in a change order.

7.0 ADDENDUM – CLAIMS MANAGEMENT

The claims unit has requested a comprehensive case management system to manage the overpayment claim life cycle that is integrated with the investigative staff's case management system. The claims unit is requesting functionality to document new claims, manage existing claims, demand letters and statements, administrative waivers, and claim payment tracking. Moreover, the scope and level of complexity associated with claims management requires multiple additional workflows and standardized reports. Representative screenshots of the CaseTracker claims system components are shown as Figures 5 through 7.

CaseTracker was designed by subject matter experts who understand the features and functions required to maximize successful benefit recovery case outcomes. This module is configurable to meet the needs of your specific unit and our business analyst team will work with you during the onboarding process to configure its functionality to your needs.

Figure 5: Pondera's CaseTracker Claims module – Debt amounts

Debt Cases

Search Keyword (Optional): Source Case ID, Debt Number, SSN, UPI, First Name or Last Name

Total Count: 11427

Source Case ID	Debt Number	First Name	Last Name	SSN	UPI	Program	Date Established	Original Debt Amount	Unpaid Balance	Linked
	20-846					MA	02/25/2020	\$2,527.98	\$2,527.98	
	20-844					FS	02/25/2020	\$702.00	\$702.00	
	20-842					FS	02/25/2020	\$1,505.00	\$1,505.00	
	20-839					MA	02/24/2020	\$382.41	\$382.41	
	20-837					FS	02/24/2020	\$1,184.00	\$1,184.00	
	20-835					MA	02/24/2020	\$1,473.20	\$1,473.20	
	20-833					MA	02/24/2020	\$2,015.79	\$2,015.79	
	20-831					MA	02/24/2020	\$7,496.12	\$7,496.12	
	20-829					FS	02/24/2020	\$2,360.00	\$2,360.00	
	20-827					FS	02/24/2020	\$8,988.00	\$8,988.00	
	20-825					MA	02/24/2020	\$2,889.75	\$2,889.75	
	20-823					MA	02/24/2020	\$7,623.00	\$7,623.00	
	20-821					FS	02/21/2020	\$824.00	\$824.00	
	20-819					MA	02/21/2020	\$562.47	\$562.47	
	20-817					FS	02/21/2020	\$534.00	\$534.00	
	20-815					FS	02/21/2020	\$710.00	\$710.00	
	20-813					FS	02/21/2020	\$516.00	\$516.00	
	20-811					FS	02/21/2020	\$3,186.00	\$3,186.00	
	20-810					FS	02/21/2020	\$132.00	\$132.00	
	20-806					FS	02/21/2020	\$172.00	\$172.00	

1 2 3 4 5 >>>

Figure 6: Pondera CaseTracker Claims module - Recovery

CASE TRACKER

Document, user, group SEARCH ADMIN

REC-18-000797

Case Profile Cost Allocation Cost Avoidance Cost Avoidance Disqualification IPV Recovery IPV Waiver Prosecution Debt Repayment History Attachments Forms Hearing Tasks

Safety Indicators Referrals Notes

Primary Subject **Residential Address** **SSN / UPI** **Safety Indicators**

Programs Medicaid SNAP **Case Subtype** Recipient **Mailing Address** **Referral Reason** Overpayment

Current Owner **Pondera FDaaS Profile** **Contact Number** **District Office**

Recovery

Total Overpayment Amount
\$1965.83

Assigned Claims Specialist **Date Claim Assigned** 2/26/2020

Claim Disposition Claim Established **Claim Disposition Date** 2/28/2020

Summary Of Debt

Recovery #	Debt #	Source Case Id	Over Payment	Linked Case
Recovery			939.83	REC-18-000797
Recovery			1026.0	REC-18-000797

Figure 7: Pondera's CaseTracker Claims module

CASETRACKER

Document, view, group, SEARCH, ADMIN, Kaitlyr

Dashboard
Cases
Entities
Locations
Safety Indicators
Staff
Flags
Document Library
FDaaS
User Guide
Reports

Recovery Information

Debt Number [REDACTED] Linked Case REC-18-000797

Source Case Id [REDACTED]
Source Case Name [REDACTED]
Household Overpaid Reason [REDACTED]
Date Of Delinquency [REDACTED]
Program 366B FS = SNAP
Debtor UPI/SS# [REDACTED]
Debtor Name [REDACTED]
Debtor Address [REDACTED]
Date Debt Referred 2/9/2018
Date Discovered 10/8/2018
Date Established 366B 10/8/2018
Responsible Party Names [REDACTED]
Classification H
Date Claim From 12/1/2017
Date Claim To 2/28/2018
Overpayment 1026.0
Offset no
Monthly Direct Pay Amount 55.0
Unpaid Balance 436.38
Repayment Method B10
Date Payment Due 3/22/2019
Benefit Reduction Effective [REDACTED]
Benefit Reductions 429.7
Office [REDACTED]

Reason For Debt HF
Reason Other [REDACTED]
Investigation N
Date Of Next Action 4/1/2020
Action Code 45
Date Of Repayment Agreement 10/8/2018
Repayment Agreement Status R
Treasury Intercept False
Address Match Status [REDACTED]
Address Match Error [REDACTED]
IRS Address [REDACTED]
IRS City [REDACTED]
IRS State [REDACTED]
IRS Zip [REDACTED]
Date Top Notice Sent [REDACTED]
Date Top Effective Sent [REDACTED]
Current Status A
Initial Amount Sent To Top 0.0
Original Debt Amount 1026.0
Payments 159.92
Adjustments 0.0
Expungements 0.0

Debt Repayment History

Original Debt Amount \$1026.0
Total Payment Amount \$159.92
Total Payment Count 6
Last Payment Date 2/21/2020

Debt Repayment #	Amount	Date	Receipt/Adjustment Number
- Debt Repayment - 114406	10.73	2/21/2020	114406
- Debt Repayment - 424635	28.7	3/4/2019	424635
- Debt Repayment - 111414	28.71	2/6/2019	111414
- Debt Repayment - 232708	28.71	1/9/2019	232708
- Debt Repayment - 424185	28.71	12/4/2018	424185
- Debt Repayment - 319513	34.36	11/7/2018	319513

Recovery Properties

Created at 10/9/2018 10:03 AM
Last Modified at 2/21/2020 10:01 PM
Author [REDACTED]
Contributors [REDACTED]
Last Contributor [REDACTED]

Edit

8.0 INCENTIVES IF PURCHASE ORDER RECEIVED BY 6/15/20

The cost of the project is listed in the table below. This begins at contract signing and includes implementation, the cost of software subscriptions for Pondera FraudCaster and CaseTracker, and ongoing training and support. If the purchase order is received by Pondera or before June 15, 2020, we will offer the following incentives:

- If recipient count increases up to 100,000 recipients, no additional cost will be incurred.
- Claims case module cost (\$59,000 annually) will be waived for the length of the project.
- One year of Thomson Reuters License Plate Recognition and CLEAR for 5 users will be included at no charge. Year 2 and beyond will be based on the price quoted by Thomson Reuters.

Description	Quantity	Year 1
CaseTracker 12-Month Subscription (Includes 366B and ROI reporting, workflows, and field designations)	1	\$130,000
CaseTracker 12-Month Subscription for Claims tracking	1	Included
FraudCaster 12-Month Subscription (Includes SSP, user trainings, and ongoing data analytics)	1	\$165,000
YEAR 1 TOTAL		\$295,000*

*Subsequent years will be subject to a 5% annual cost increase year-over-year.