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— NEW YORK STATE —  
ASSOCIATION OF COUNTIES

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## Fraud Challenges for DSS:

*Improving your Ability to Detect and Investigate Fraud and Financial Exploitation in Your Communities*

**Bonadio & Co., LLP**  
Accounting, Consulting & More



Mark LaVigne, PhD  
Deputy Director  
NYSAC

# The Growing Crisis

*Fraud and financial exploitation are surging in social service programs, diverting critical resources from those in need. Government benefits fraud cases jumped 242% since 2020, while elder financial abuse cost Americans 60+ over \$3.4 billion in 2023 alone.*

*Counties face mounting responsibility to safeguard public assistance funds and protect vulnerable clients through modern tools and strategic approaches.*



# What We'll Cover Today

01

Trends in Fraud & Exploitation

*Current patterns nationally and in NYS*

03

Tools & Technology

*AI-driven solutions and analytics*

05

Case Examples

*Recent schemes and lessons learned*

02

Responsibilities & Laws

*County DSS roles and enforcement*

04

Prevention Strategies

*Front-end detection and best practices*

06

Building a Prevention Culture

*Making detection cost-effective*

# Why This Matters Now

## Rising Fraud Losses

*Federal benefits fraud cases up 242% since 2020. Medicaid alone loses ~\$37 billion annually to fraud and errors.*

## Cost to Those in Need

*Every dollar stolen is unavailable to legitimately needy families, undermining program effectiveness.*

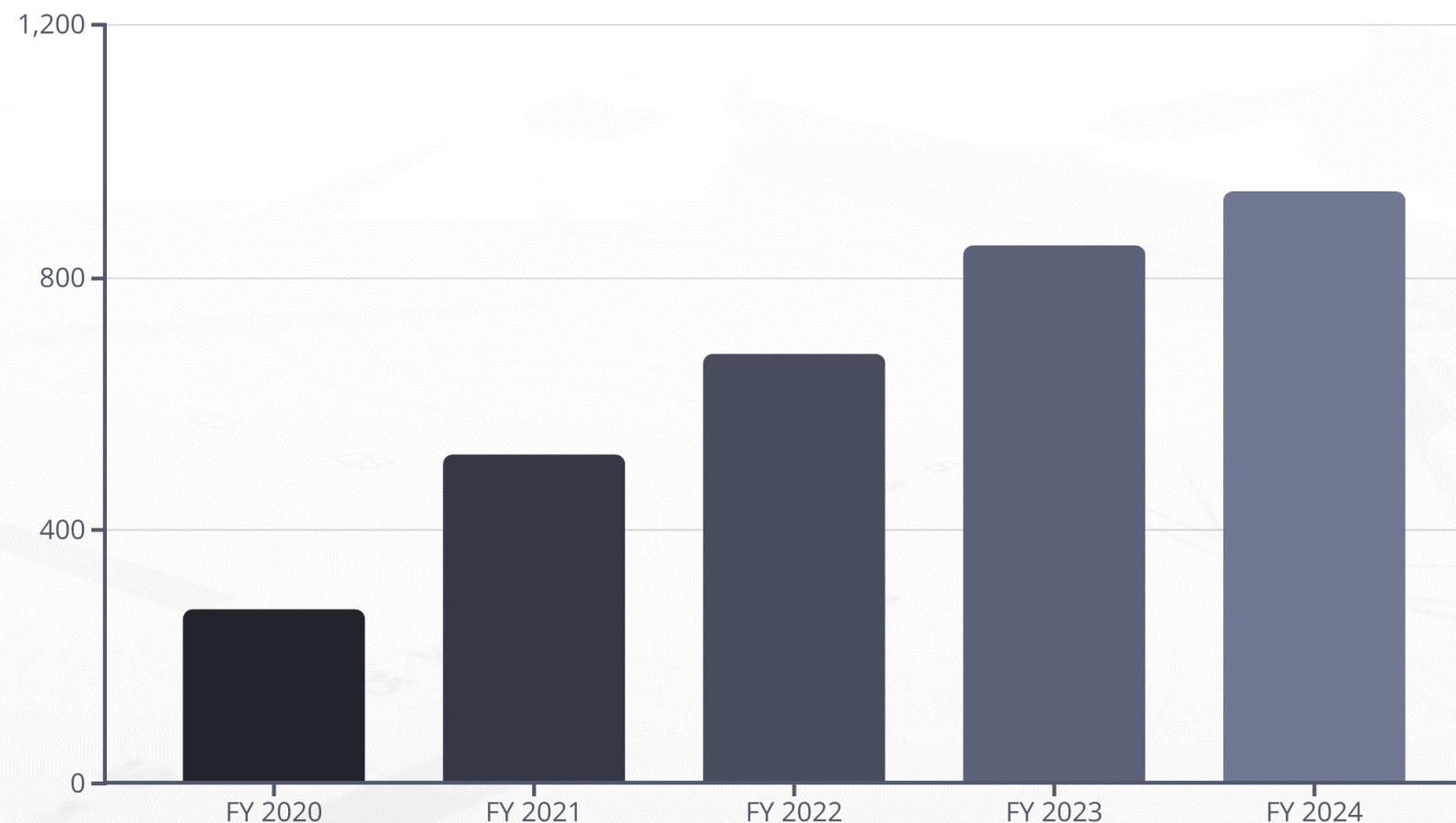
## Elder Abuse Surge

*\$3.4B lost by Americans 60+ in 2023 (+11% vs 2022). Only 1 in 44 cases reported.*

## Public Trust at Stake

*High-profile fraud erodes confidence in social programs and taxpayer support.*

# Federal Benefits Fraud Explosion



## Key Findings

- *Median loss per case: \$137,000*
- *23% of cases involve >\$550,000 stolen*
- *20% had disaster-related fraud enhancements*
- *Southern District of NY in top 5 prosecutions*



## New York State Snapshot

574K

Public Assistance Recipients

*March 2023 – highest level since 2015, up  
14.5% from prior year*

990

OWIG Fraud Complaints

*Handled in 2024, uncovering identity  
theft and false income claims*

\$600K

Court-Ordered Restitution

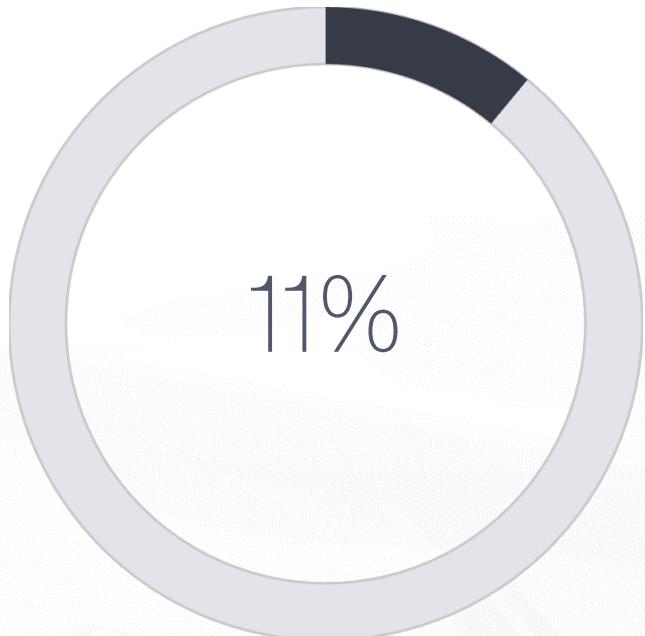
*From OWIG investigations and  
prosecutions in 2024*

# Financial Exploitation Crisis



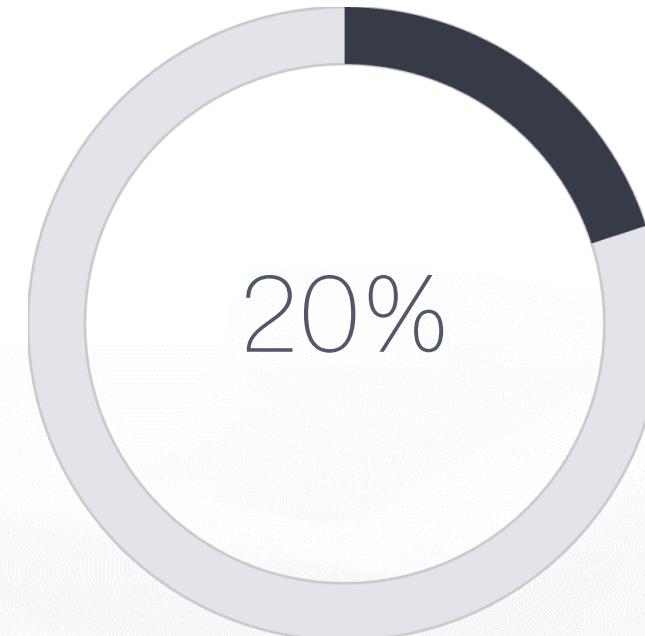
Reporting Rate

*Only 1 in 44 cases gets reported*



↑ Annual Increase

*Elder fraud losses 2022-2023*



NY's Share

*Of national EBT skimming theft*

## Who Perpetrates?

- *Strangers via tech support, romance, IRS scams*
- *Trusted individuals: relatives, caregivers, agents*
- *Financial institutions filed 155,000 SARs involving \$27B*

# County DSS Responsibilities

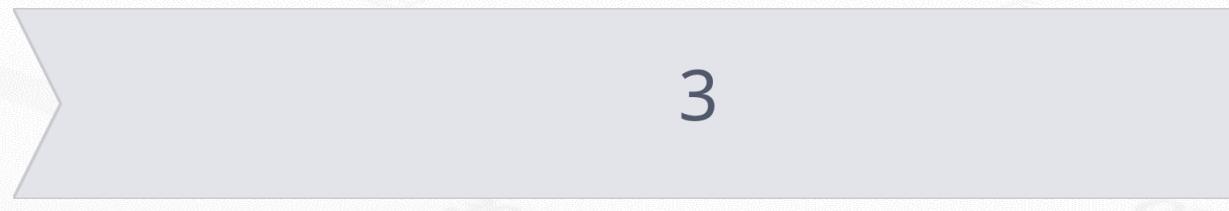


State Law Mandate

*SSL §134-b requires procedures to identify, investigate, and resolve fraud in applications*

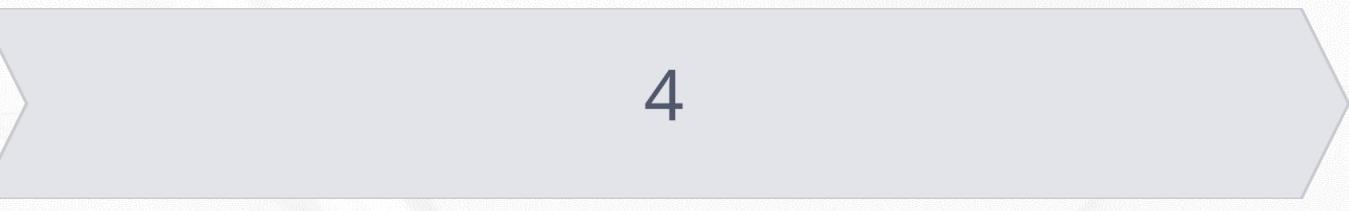
Detection Programs

*FEDS, AFIS, EVR systems to catch ineligible cases early*



Investigation & Referral

*SIU reviews allegations, works with DAs and law enforcement*



APS Protection

*Investigate exploitation reports, coordinate with banks and police*

# Welfare Fraud Penalties

New York Penal Law Article 158

<i>Degree</i>	<i>Amount</i>	<i>Class</i>
<i>5th Degree</i>	<i>Any amount</i>	<i>A Misdemeanor</i>
<i>4th Degree</i>	<i>&gt;\$1,000</i>	<i>E Felony</i>
<i>3rd Degree</i>	<i>&gt;\$3,000</i>	<i>D Felony</i>
<i>2nd Degree</i>	<i>&gt;\$50,000</i>	<i>C Felony</i>
<i>1st Degree</i>	<i>&gt;\$1 million</i>	<i>B Felony</i>

Consequences

- *Full restitution required*
- *Imprisonment (up to 1 year misdemeanor, up to 25 years B felony)*
- *Federal average: 16 months prison*
- *Program disqualification (1 year to permanent)*
- *Civil recovery actions*

# Overpayment Recovery Strategies



Voluntary Repayment Plans

*Negotiate affordable payment schedules*

Benefit Reduction

*Recoup from ongoing benefits (within regulatory limits)*

Treasury Offset Program

*Intercept federal tax refunds*

Civil Judgments

*Court-ordered repayment with liens if necessary*

Lottery/Gaming Winnings

*State intercepts of large winnings*

Wage Garnishment

*Court-ordered payroll deductions*

# SNAP Fraud - Detailed Breakdown

## Types of SNAP Fraud

- *Trafficking (selling benefits for cash)*
- *Application fraud (false income/household info)*
- *Retailer fraud (fake stores, inflated prices)*
- *Card theft and skimming*

## Detection Methods

- *Transaction pattern analysis*
- *Retailer monitoring systems*
- *Data matches with employment records*
- *EBT usage anomalies*

# Medicaid Fraud - Key Areas

## Provider Fraud

*Phantom billing, upcoding services, kickback schemes*

## Recipient Fraud

*Eligibility misrepresentation, undisclosed assets/income*

## Prescription Drug Fraud

*Doctor shopping, forged prescriptions, diversion*

## Identity Theft

*Using stolen identities to obtain coverage*



# Medicaid Fraud Prevention Methods

## Detection Strategies

- *Provider enrollment screening and background checks*
- *Claims data analysis and pattern recognition*
- *Utilization review for unusual billing patterns*
- *Site visits and audits of high-risk providers*
- *Beneficiary verification and eligibility checks*
- *Cross-referencing with death records and incarceration data*

## Prevention Measures

- *Pre-payment review of suspicious claims*
- *Post-payment audits and recovery actions*
- *Provider education on billing requirements*
- *Fraud hotlines and whistleblower programs*
- *Coordination with Medicaid Fraud Control Units*
- *Data sharing with other states and federal agencies*

*New York's Medicaid program uses advanced analytics to identify ~\$4.5 billion in improper payments annually*

# TANF & Cash Assistance Fraud

## Common Schemes

- *Unreported employment or income*
- *Failure to report household composition changes*
- *Concealing assets or resources*
- *Dual state participation*
- *False residency claims*

## Prevention Measures

- *Front End Detection System (FEDS)*
- *Regular recertification with verification*
- *PARIS interstate data matches*
- *New hire directory checks*
- *Home visits for high-risk cases*

# Adult Protective Services - Financial Exploitation Indicators

## Common Exploitation Indicators

- *Sudden changes in banking patterns or account activity*
- *Unexplained withdrawals or transfers of large sums*
- *Addition of names to bank accounts or property titles*
- *Unpaid bills despite adequate resources*
- *Unusual concern by caregiver about costs*
- *Isolation of elder from family/friends*
- *Signatures on documents that don't match*
- *Missing personal belongings or property*

## APS Response & Prevention

- *Financial record review and analysis*
- *Coordination with law enforcement and banks*
- *Emergency protective orders when needed*
- *Guardianship proceedings if necessary*
- *Multi-disciplinary team investigations*
- *Community education and outreach*
- *Bank reporting under SSL §473-b*

# Modern Tools: AI & Data Analytics



## Risk Scoring & Pattern Detection

*Machine learning analyzes vast datasets to assign risk scores and identify complex schemes, providing ranked case lists.*



## Actionable Insights

*AI presents results through intuitive graphs, link charts, and heat maps showing hidden relationships and anomalies.*



## Cross-Program Integration

*Merges SNAP transactions, DMV records, incarceration data to catch inconsistencies across programs.*



## Proven Impact

*One state identified \$50M in Medicaid overpayments, recovering \$18.7M. Duplicate payment models found \$130M.*



# Thomson Reuters Fraud Detect

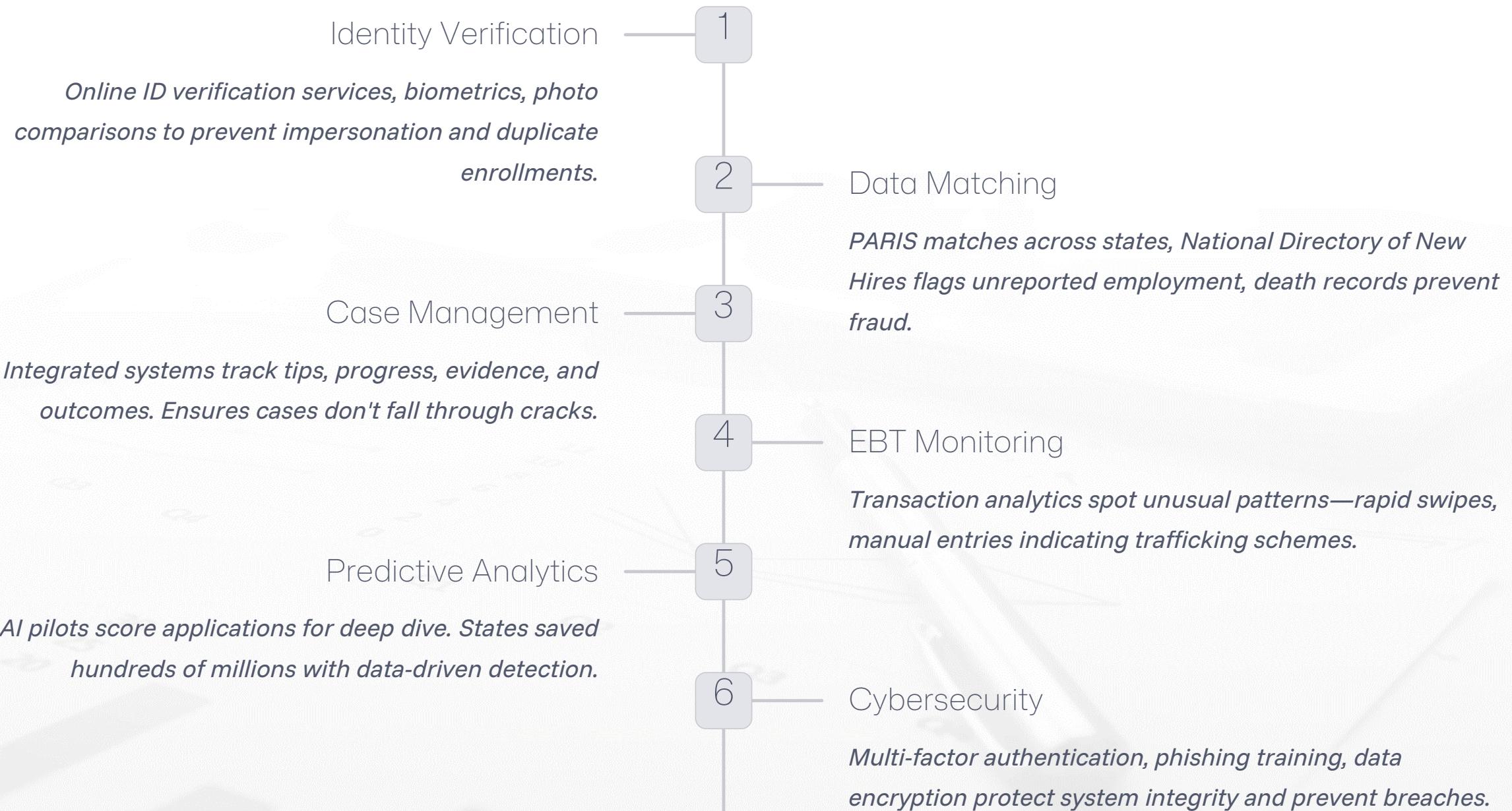
## Key Capabilities

- *Expert machine learning for fraud prediction*
- *Stack-ranked case lists by risk score*
- *Link charts connecting entities and patterns*
- *Integration with CLEAR public records*
- *Live data updates and prioritization*
- *User-friendly dashboards for non-analysts*

*"Used by 4 of top 10 Medicaid-heavy states. Color-coded alerts with plain-language explanations make complex analysis accessible."*



# Additional Technology Solutions





# Identity Verification Technologies

## Biometric Verification

*Fingerprints, facial recognition, voice authentication*

## Document Authentication

*ID scanning, hologram verification, digital forensics*

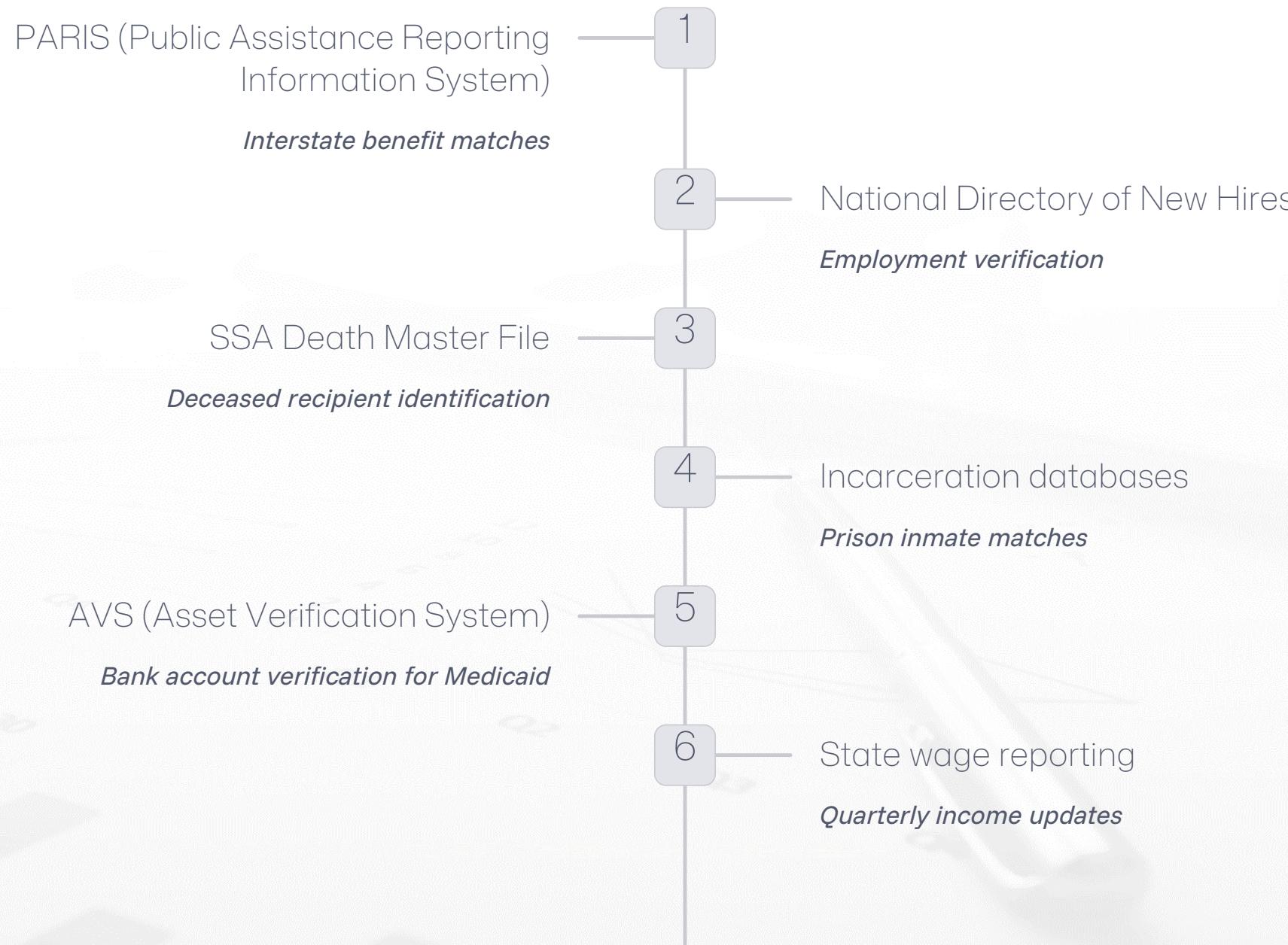
## Knowledge-Based Authentication

*Personal history questions, credit bureau data*

## Multi-Factor Authentication

*Combining multiple verification methods for high-risk cases*

# Data Matching Programs



# Front-End Detection Strategies

1

## Trust but Verify

*Robust FEDS implementation. Train workers on red flags. Investigator participation in interviews yields phenomenal cost avoidance.*

2

## Rigorous Proofs

*Valid photo ID, SSN validation, proof of residence. Use electronic verification sources. Consider video interviews.*

3

## Applicant Education

*Communicate penalties clearly. Have applicants sign declarations acknowledging fraud consequences and criminal charges.*

4

## Early Data Matching

*Leverage pre-enrollment checks: credit bureaus, new hire records, property registrations to spot discrepancies.*

5

## Intake Collaboration

*Break down walls between eligibility staff and investigators. Encourage teamwork and routine fraud referrals.*

# Investigation Best Practices



## Initial Assessment

*Review complaint/referral, gather basic facts, determine jurisdiction*



## Evidence Collection

*Subpoena records, interview witnesses, document timeline*



## Financial Analysis

*Review bank statements, trace funds, identify discrepancies*



## Case Documentation

*Maintain chain of custody, detailed notes, organize evidence*



## Collaboration

*Coordinate with law enforcement, DA, other agencies*



## Resolution

*Prosecution referral, administrative action, or case closure with findings*

# Ongoing Program Integrity

01

## Periodic Reviews

*Regular check-ins, interim reports, annual renewals with verification. Targeted quarterly case samples.*

02

## Continuous Monitoring

*Rolling data matches post-approval. Monthly wage matches, death records, incarceration checks.*

03

## Fraud Hotlines

*Anonymous tip systems, online forms. Ensure timely investigation of community reports.*

04

## Training & Culture

*Regular staff training on fraud prevention, ethics, documentation. Cultivate office-wide responsibility.*

05

## Prosecute & Publicize

*Work with DAs on clear-cut cases. Issue press releases demonstrating enforcement and deterring future fraud.*

06

## Recovery Efforts

*Strong overpayment recoupment process. Civil judgments, tax offsets, consistent collection tracking.*

# Recent Fraud Schemes

1

## EBT Card Skimming

*85,000 NY cases in 2023-24, nearly \$40M stolen. Criminals use illegal card readers at checkout to clone cards and drain accounts.*

2

## Insider Fraud

*\$66M SNAP scheme: USDA employee sold confidential retailer credentials to criminals for fake transactions over 7 years.*

3

## Pandemic Abuse

*\$47B+ in fraudulent UI claims identified. Fraudsters exploited emergency programs, then shifted to regular welfare.*

4

## Multi-Benefit Fraud

*Nassau County case: \$75K stolen across SNAP, Medicaid, housing by concealing income. Cross-program investigations crucial.*

# Pandemic-Era Fraud Lessons

## What Happened:

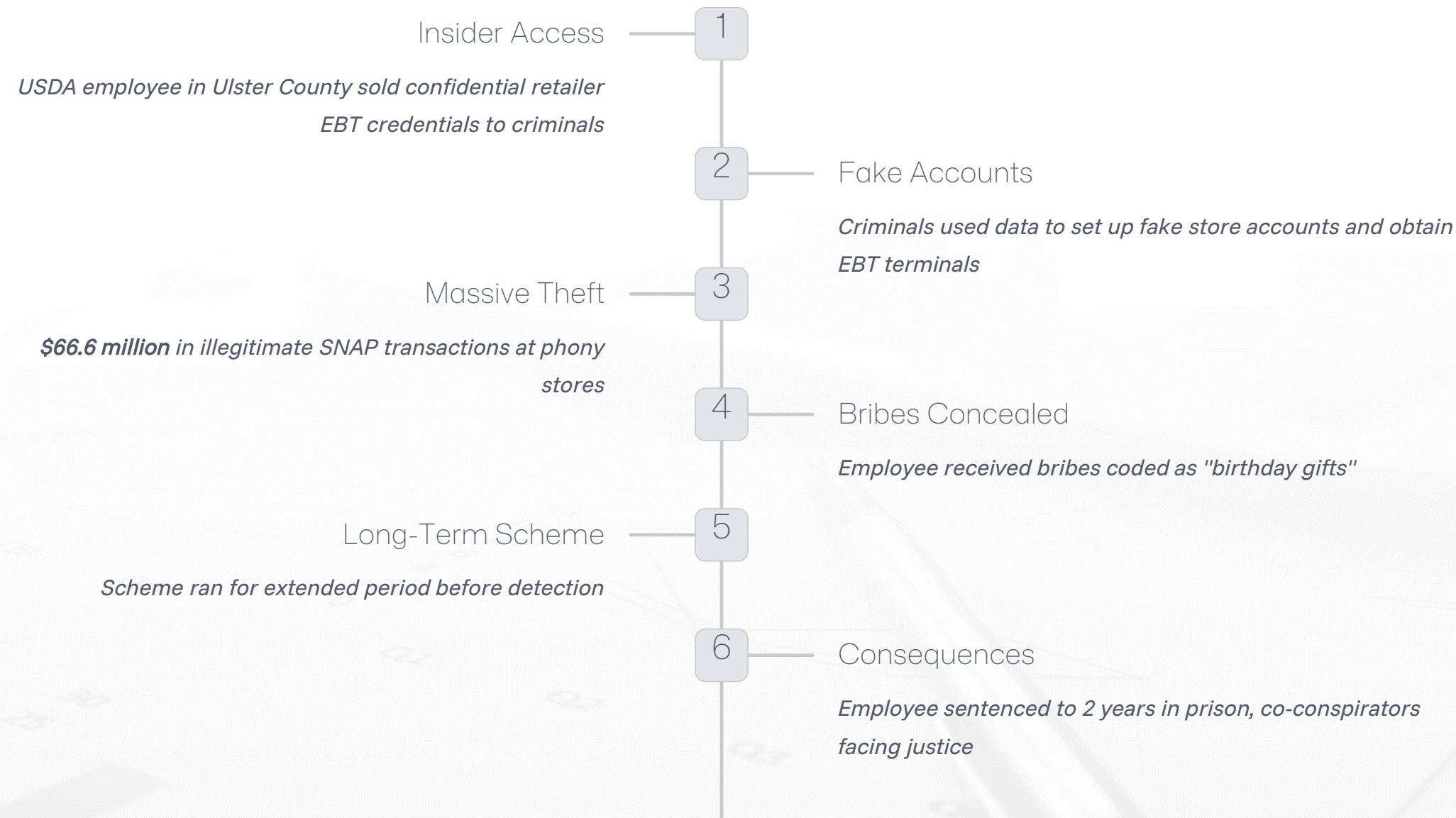
- *\$47 billion in fraudulent unemployment insurance claims identified in NY*
- *Relaxed verification rules created openings*
- *Identity theft rings exploited emergency programs*
- *Fraudsters shifted to regular welfare programs when emergency aid ended*

## Lessons Learned:

- *Surges in funding require heightened vigilance*
- *Temporary rule relaxations need post-crisis audits*
- *Review unusual spikes in enrollment*
- *Tighten verification after emergency periods end*
- *Crisis-time fraud task forces are essential*

*Emergency response speed must be balanced with fraud prevention controls*

# The \$66 Million SNAP Insider Fraud Case



- ❑ **Key Lesson:** Even those entrusted to stop fraud can be corrupted. Robust oversight, separation of duties, and system audits are critical.

# Brooklyn Medicaid Fraud - \$68 Million Scheme

*Seven individuals convicted of stealing \$68 million from New York's Medicaid program by setting up fake adult day care centers and billing for phantom services. The scam ran for seven years before being caught.*

\$68M Stolen  
*from Medicaid*

7 Years  
*undetected*

Multiple Fake  
*facilities*

Phantom Billing  
*for services never provided*

## Lessons:

*Large-scale fraud can persist without proactive detection*

*Provider fraud requires ongoing monitoring*

# Building a Prevention Culture

Leadership Tone  
*Executives emphasize integrity importance, recognize fraud detection achievements*

Client Outreach  
*Balance fraud prevention with client education on rights and reporting responsibilities*



Interdepartmental Cooperation  
*Build ties with County Attorney, Comptroller, Sheriff, DA through task forces*

Community Partnerships  
*Educate banks, senior centers, nonprofits. Well-informed community reports concerns*

Transparency & Metrics  
*Track and publish investigations, recoveries. Show accountability to public and staff*

# Training & Staff Development

## Essential Training Topics

- *Fraud indicators and red flags*
- *Interview techniques and documentation*
- *Legal requirements and due process*
- *Technology tools and systems*
- *Cultural competency and ethics*

## Training Methods

- *Annual in-service workshops*
- *Online learning modules*
- *Peer mentoring programs*
- *Case study reviews*
- *Cross-training with law enforcement*

*Regular training keeps staff current on evolving fraud tactics and detection methods*

# Collaboration with Financial Institutions

*Banks can report suspected elder exploitation under SSL §473-b with immunity*

*Financial institutions filed 155,000 suspicious activity reports for elder exploitation in one year*

*\$27 billion in suspicious transactions flagged*

*Joint training between APS and bank staff*

*Rapid response protocols when exploitation detected*

*Account freezes and protective measures*

- New York law encourages banks to directly report to APS - a critical early warning system**

# Performance Metrics & Reporting

*These example metrics represent key performance indicators that counties should track for their fraud prevention programs, illustrating a typical county fraud prevention unit's annual monitoring.*

Number of fraud investigations initiated

*Total new cases launched for investigation*

Percentage of cases substantiated

*Cases confirmed as fraud after investigation*

Dollar amount of fraud identified

*Total value of fraudulent claims detected*

Recovery/restitution collected

*Funds successfully returned to programs*

Cost avoidance from FEDS and prevention

*Savings from stopping fraud before payment*

Average investigation completion time

*Time from case opening to resolution*

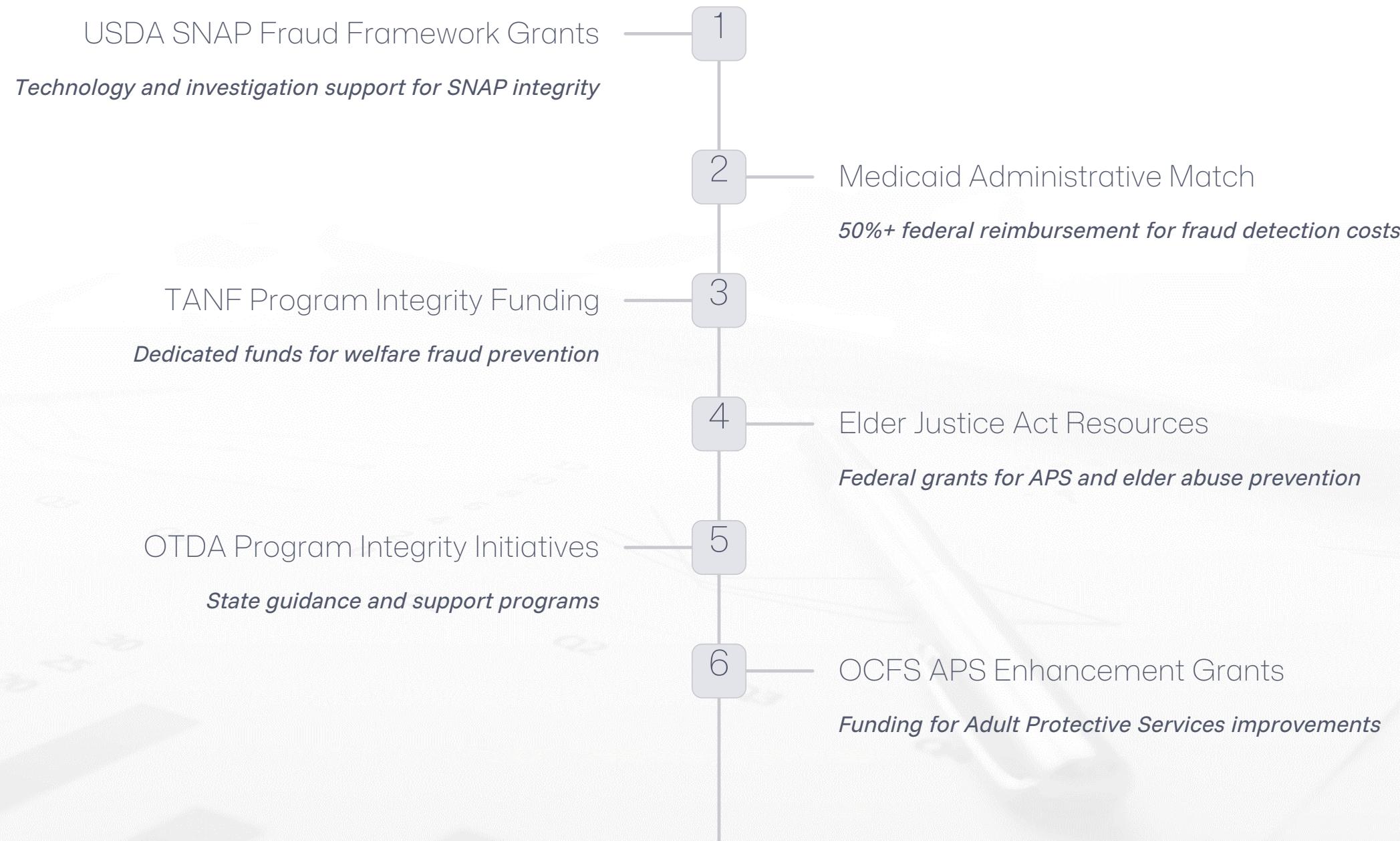
Prosecution referrals and outcomes

*Cases referred for criminal charges*

Staff productivity

*Cases completed per investigator*

# Federal & State Funding Opportunities



# Cost-Effectiveness of Fraud Prevention

*Key statistics highlight the significant return on investment in fraud prevention:*

- *Illinois saved over \$100 million in its first year with enhanced data matching.*
- *Typical county fraud units recover \$5-10 for every \$1 spent on prevention.*
- *Technology investments in fraud prevention typically pay for themselves within 6-12 months.*

## Investment Strategies

- *Multi-county consortium purchases*
- *State/federal grant funding*
- *Incremental pilot programs*
- *Tiered vendor plans*

## Hidden Benefits

- *Labor savings and productivity gains*
- *Risk mitigation (avoiding scandals)*
- *Improved public trust*
- *Staff time optimization*

# California: SNAP EBT Upgrades

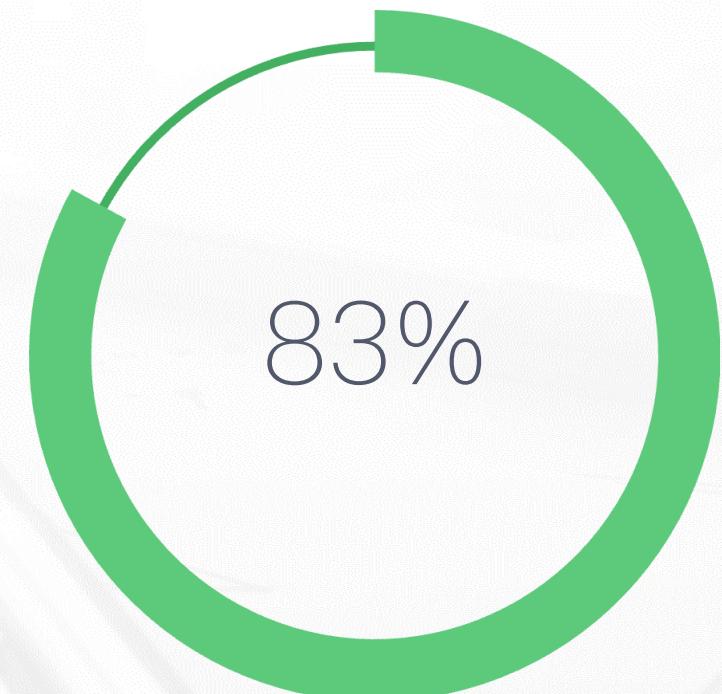
## The Problem

*Surge in EBT skimming attacks. \$20.9M stolen in January 2024 alone, depriving vulnerable families of food and cash assistance.*

## The Solution

- *First-in-nation EMV chip cards*
- *AI predictive model scanning transactions*
- *Forced PIN resets for compromised accounts*

## The Results



## Theft Reduction

*Reported EBT theft fell 83% from Jan 2024 to late 2025*

# Missouri: Fraud Detection Platform

## The Challenge

*Traditional manual fraud referrals weren't catching organized identity theft rings and duplicative applications in SNAP program.*

## The Innovation

*In-house platform titled Fraud Finder supported by USDA grant. Five analytic modules process tens of thousands of data points, auto-creating investigations when criteria are met.*

1,000+

Investigations Launched

*In first full year*

59

Prosecutions

*Egregious fraudsters referred to prosecutors*

\$4.8M

Fraud Identified

*Cumulative by 2025 for recovery*

\$2M

Prevented Payouts

*Saved in first year alone*

# Ohio: Child Care Subsidy Safeguards

## Attendance Verification

*Secure PIN/QR code check-in ensures payment only for actual attendance.*

## Surprise Inspections

*10,000+ unannounced visits in 2025.*

## Data Analytics

*Monthly cross-department checks flag anomalies for risk-based monitoring.*

## Public Tip Line

*124 fraud referrals in 2025; over half confirmed as misconduct, with 12 centers closing directly as result of tip line.*

## Policy Reforms

*Strict PIN rules, tightened billing, ended 900+ improper authorizations.*

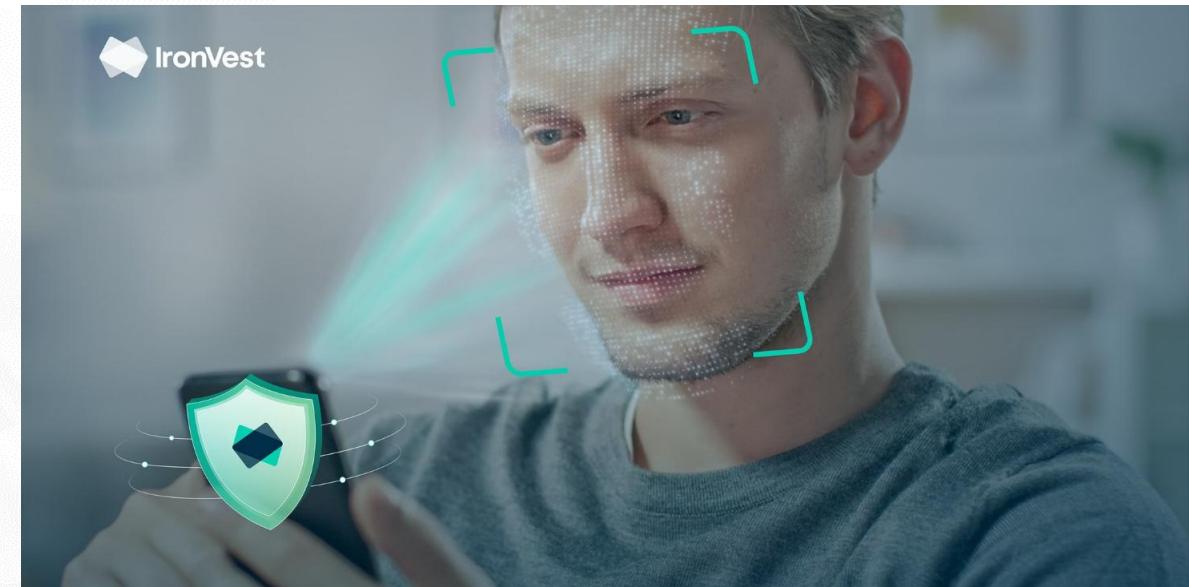
# Arkansas: EBT Security Upgrade

## The Problem

*Sharp increase in SNAP fraud reports. Criminals exploiting EBT vulnerabilities through skimming devices and phishing calls.*

## The Response

- *Modified EBT vendor contract for "Adaptive Fraud" detection*
- *Real-time alerts and transaction blocking*
- *Blocked easy-to-guess PINs like "1111"*
- *Fraud awareness outreach and consumer education*



**Results:** Savings from averted SNAP thefts exceeded costs of new anti-fraud system. Surge in EBT fraud cases quelled, protecting funds for families who truly need assistance.

# Illinois & Pennsylvania: Data-Driven Success

## *Hundreds of Millions Saved Annually*

Illinois:

- *Implemented rigorous cross-check system (Illinois Medicaid Redetermination Project)*
- *Removed ineligible cases through enhanced data matching*

Pennsylvania:

- *Deployed fraud analytics and data matching technology*
- *Bipartisan support for anti-fraud reforms*

## Common Elements:

- *Investment in predictive analytics*
- *Automated data matching across agencies*
- *Proactive fraud detection vs. reactive investigation*
- *Strong ROI demonstrating value of technology investment*

# New York: Medicaid Analytics

## The Challenge

*NY Medicaid losing billions to improper payments—duplicate enrollments, billing errors, ineligible recipients. \$4.5B in overpayments uncovered in one audit year.*

## The Solution

*Centralized fraud detection system mandated by 2015 law. State Comptroller deployed advanced data analytics to flag anomalies across Medicaid and other programs.*

## The Impact

*Identified and prevented ~\$4.5B in Medicaid irregularities in 12-month period ending May 2023. Strengthened program integrity by stopping payments for ineligible or duplicate cases.*

# Common Success Factors



## Leadership Commitment

*Executive support and clear prioritization of program integrity initiatives from the top down.*



## Technology Investment

*Strategic adoption of AI, analytics, and automation tools matched to specific fraud challenges.*



## Cross-Agency Collaboration

*Breaking down silos between DSS, law enforcement, banks, and community partners.*



## Continuous Improvement

*Regular evaluation of metrics, adaptation to new fraud tactics, and scaling successful pilots.*

# Implementation Roadmap



## Assess & Prioritize

*Evaluate existing capacity, identify gaps, and prioritize high-impact opportunities based on data.*

## Pilot & Refine

*Conduct small-scale technology pilots, measure results, and refine strategies before expansion.*



## Partner & Deploy

*Engage state resources and vendors, then comprehensively train staff on new tools and processes.*

## Monitor & Scale

*Continuously track performance metrics, adapt approaches, and expand successful initiatives.*

# Comprehensive Support & Funding

## Government Funding & Guidance

- *NYS Welfare Inspector General (OWIG) training and support*
- *OTDA program integrity initiatives and guidance*
- *State-negotiated vendor contracts and group rates*
- *SNAP Fraud Framework grants from USDA*
- *Medicaid administrative match (50%+ reimbursement)*

## Partnerships & Technology Solutions

- *NYSAC forums and working groups*
- *NY Welfare Fraud Investigators Association*
- *Regional fraud task forces*
- *Thomson Reuters Fraud Detect*
- *FraudFindr by The Bonadio Group*
- *EBT security solutions*

# Key Takeaways

## Trends Demand Action

*Fraud and exploitation are significant, evolving threats.  
Doing nothing risks resources and public trust.*

## People & Process Matter

*Tools supplement but don't replace human judgment.  
Cultivate vigilant culture and refine processes.*

## Technology Multiplies Impact

*Modern analytics and AI make detection accessible,  
efficient, and consistent—even for small teams.*

## Protect the Vulnerable

*Anti-fraud efforts ensure programs fulfill their mission and  
protect both clients and taxpayers.*

# Take These Steps This Week

01

Schedule Team Meeting

*Gather key staff to discuss presentation takeaways and identify immediate opportunities*

02

Request Vendor Demos

*Contact 2-3 technology vendors for product demonstrations and pricing information*

03

Review Current Metrics

*Compile baseline data on fraud investigations, recoveries, and staff resources*

04

Identify Funding Sources

*Research available state grants, federal matches, and consortium opportunities*

05

Connect with Peers

*Reach out to counties with successful programs to learn from their experiences*

06

Draft Enhancement Plan

*Begin outlining 12-month roadmap with specific goals, timelines, and resource needs*

# Thank You

*Thank you for joining us today!*

*For questions or additional information, please contact Josh at:*

*Email: [jbills@bonadio.com](mailto:jbills@bonadio.com)*

*Phone: 585-662-2210*

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