



BUREAU OF THE  
**Fiscal Service**  
U.S. DEPARTMENT OF THE TREASURY

**We will begin at 1:05**

**September 27, 2022**



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**Fiscal Service**  
U.S. DEPARTMENT OF THE TREASURY

# **Payment Integrity Best Practices Forum: Addressing Improper Payment Challenges in the Inspector General Community**

September 27, 2022

# Future of Payment Integrity Services and Solutions

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## Office of Payment Integrity



***Do Not Pay® Business Center*** assist agencies by providing access to data sources (e.g., death, debt, and debarment) and data analytics solutions to identify, reduce, and prevent improper payments.



***Payment Integrity Center of Excellence (PICOE)*** provides actionable business insights and solutions that transform how agencies approach identification, prevention, and recovery of improper payments.

### Purpose:

To provide services that address payment integrity challenges and to help advance the tools, solutions, and data available for identifying and stopping improper payments.

# Agenda

Time	Activity	Facilitator
1:05 – 1:10	Welcome and Introductions	Marshall Henry Director, Do Not Pay Business Center
1:10 – 1:25	Overview of Data Sources	Angélique Bridges Lead, IG Engagements
1:25 – 1:45	Web API	Steve Burbank
1:45 – 2:05	Analytics Services	Brian Hewitt Data Analytics Advisor
2:05 – 2:30	Best Practices	Samuel Bronson, Data Analytics Office of Inspector General, SBA
2:30 – 2:40	Investigative Support, PICOE	Amy Sipps, Lead Business Analytics Specialist  Mary Pat Zimmer, Business Analytics Specialist
2:40 – 2:55	Open Forum / Questions	Attendees
2:55 – 3:00	Adjournment	Angélique Bridges



**DNP** DO  
NOT  
PAY

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DNP DO NOT PAY

**Angélique M. Bridges**  
**Outreach & Business Processes**  
**September 27, 2022**

# Do Not Pay Business Center Background

## Authorities

### AUTHORITY



#### Office of Management and Budget (OMB)

- OMB **issues** guidance for the DNP program but retains program authority
- OMB must **designate** additional databases for use in DNP

### HOST – THE WORKING SYSTEM



#### Department of the Treasury (Fiscal Service)

The **Working System** and DNP together **create** one element of the larger multi-agency government-wide DNP Initiative and centrally **provides** a variety of data matching and data analytics services to **support** agency programs in their efforts to **detect** and **prevent** improper payments

### BUSINESS CENTER

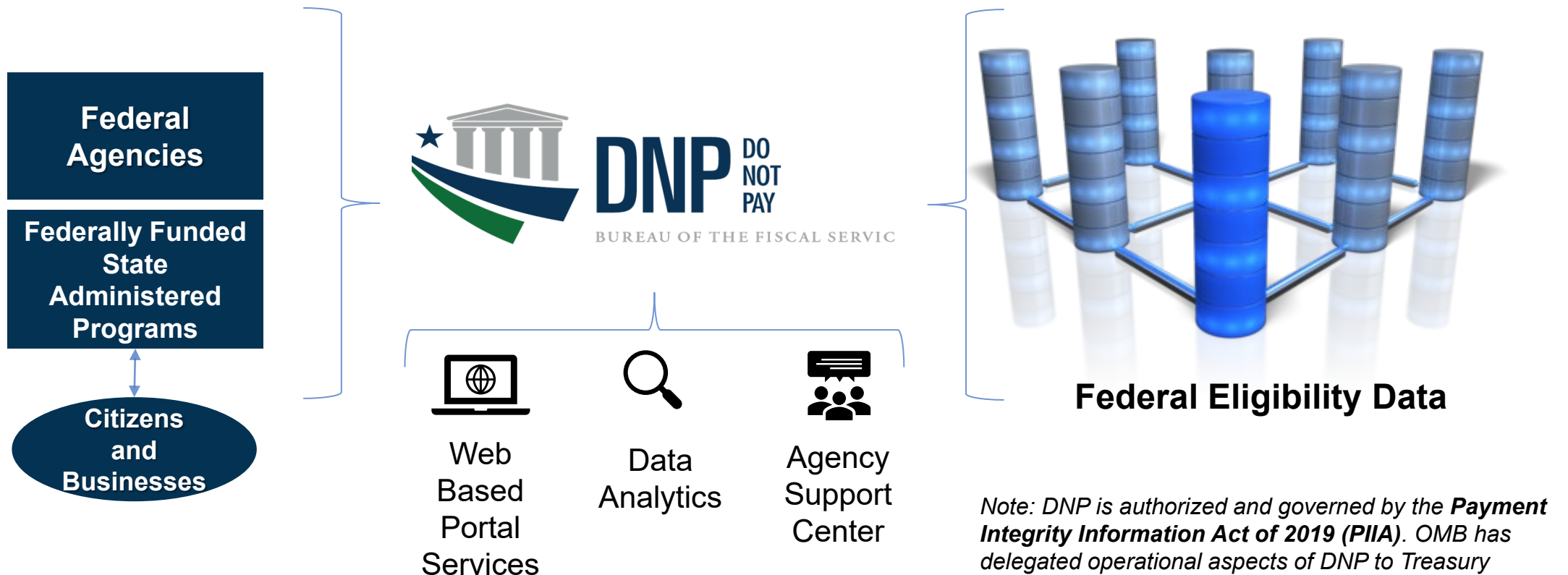


#### Do Not Pay

DNP is **authorized** and **governed** by the **Payment Integrity Information Act of 2019 (PIIA)** and several OMB memoranda and circulars

# What is the DNP Business Center?

The **Do Not Pay Business Center** is a resource that offers **centralized** access to relevant data sources for **verifying** payment or award **eligibility**. DNP offers customized data analysis to help agencies detect fraud, waste, and abuse and strengthen internal controls. DNP provides agencies Improper payment consultation and ongoing support.



# Web-based Portal Services

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## Pre-Award/Pre-Payment



### Online Search

User can search an individual or entity and view matching records



### Batch Matching

One-time bulk submission for screening grants or loan payments against specified data sources



### Continuous Monitoring

Continuous screening for eligibility verification against specified data sources using a grantee or loan recipient listing



### Web Service/API

A Web Service or Application Programming Interface (API) creates a connection with agency payment systems and the DNP Portal. This integrates the functionalities of the Portal within agency internal systems.

- **Single Query API** call contains the search criteria of one entity to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for that single entity.
- **Multiple Query API** call contains the search criteria of up to 100 entities to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for the searched entities.



# DNP Data Sources

## The DNP Initiative

### DEATH SOURCES

#### **American InfoSource Death Data (AIS) - Obituary/Probate - Commercial**

- Contains information on deceased individuals obtained from more than 3,000 funeral homes and thousands of newspapers, as well as county-level probate records

#### **Death Master File (DMF) - Public (SSA)\*\***

- Contains records of deceased individuals as reported by family members, funeral homes, hospitals, federal agencies, postal authorities, and financial institutions; public version does not include state-reported deaths

#### **Department of Defense (DOD) Death Records - Public**

- Contains records of individuals in active or reserve military duty, including whether an individual is deceased

#### **Department of State Death (DOS) Records - Public**

- Contains records of American Citizens who are deceased or presumed deceased in foreign countries, as reported by U.S. embassies or consulates upon its receipt of a foreign death certificate or finding of death by a local competent authority

#### **Electronic Verification of Vital Events Fact of Death (EVVE FOD) – Commercial (NAPHSIS)**

- Contains information about death certificates in the vital records databases of 44 participating states and jurisdictions

### DEBT SOURCES

#### **Credit Alert System (CAIVRS) - Restricted (DOJ, HUD, SBA, & USDA)\*\***

- Contains records of individuals with federal debt in delinquent or default; verify whether an individual is a delinquent federal borrower

#### **Treasury Offset Program (TOP) Debt Check - Restricted (Treasury)\*\***

- Contains records of individuals whose debt has been referred to Debt Management Services for collection; verify whether a payee owes delinquent non-tax debts to federal government (and participating states)

# DNP Data Sources

## The DNP Initiative (cont'd.)

DEBARMENT SOURCES

### **Automatic Revocation of Exemption List (ARL) – Public (IRS)**

- Contains entities that have their tax-exempt status automatically revoked under the law because they have not filed form 990-series returns or notices annually for three consecutive years

### **List of Excluded Individuals and Entities (LEIE) - Public & Restricted (HHS OIG)\*\***

- Verify whether payments are to individuals and entities currently excluded from participating in federal health care programs

### **Office of Foreign Assets Control (OFAC) - Public (Treasury)\*\***

- Contains records of individuals, groups, and entities which are under sanction by the federal government and therefore ineligible for payment

### **Publication 78 (PUB 78) – Public (IRS)**

- List of organizations that can receive tax-deductible contributions; verify whether an individual is a delinquent federal borrower

### **System for Award Management (SAM) Entity Registration Records - Restricted (GSA)\*\***

- Contains records of individuals and businesses authorized to participate in contracts with the federal government; verify that a vendor seeking to do business with the federal government has registered, in accordance with the Federal Acquisition Regulation (FAR)

### **SAM Exclusion Records - Public & Restricted - (GSA)\*\***

- Contains records of individuals and businesses currently debarred from participating in contracts with the federal government under specific exclusions or registered to conduct business with the federal government; verify whether payments are to debarred individuals

# DNP - New Data

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## Eligibility/Debarment

Database	Owner	Description
National Plan and Provider Enumeration List (NPPES)	CMS	Contains information on approved health care providers and plans.
National Disqualified List	USDA	Contains information on providers that are ineligible to receive federal funding for a meals program.
Form 990-N (e-Postcard) – Public	IRS	List of organizations that can receive tax-deductible contributions; verify whether an individual is a delinquent federal borrower

## Incarceration

Database	Owner	Description
Bureau of Prisons Data	BOP	Contains information on incarcerated individuals under the jurisdiction of the US Attorney General.

# DNP - New Data

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## Multi-Use/Death

Database	Owner	Description
DNP Adjudication Data	Fiscal Service	Payment records within DNP indicating whether an agency has found a payment to be improper.
Payments, Claims, and Enhanced Reconciliations (PACER)	Fiscal Service	Post-Payment data includes action that has taken place after a payment has been made, including offset, debt referral and reclamation from a bank.
Beneficiary Identification Record Locator Service (BIRLS)	VA	Master list of VA beneficiaries, including address, death indicator, whether the individual is active/reserve and other information.

# Social Security Administration Death Master File

## Current

### Death Master File **Public**

- Access restricted by Social Security Act
- Does not include a death data from states
- Data may include Social Security Numbers (SSNs), first name, middle name, last name, date of birth, date of death

## December 2023

### Death Master File **Full**

**Includes State Death Records**



# Future Eligibility Hub Concept for DNP

## Payment Integrity Hub

Centralized access point to perform eligibility verification, interstate match, data analysis (quality/integrity, etc.)

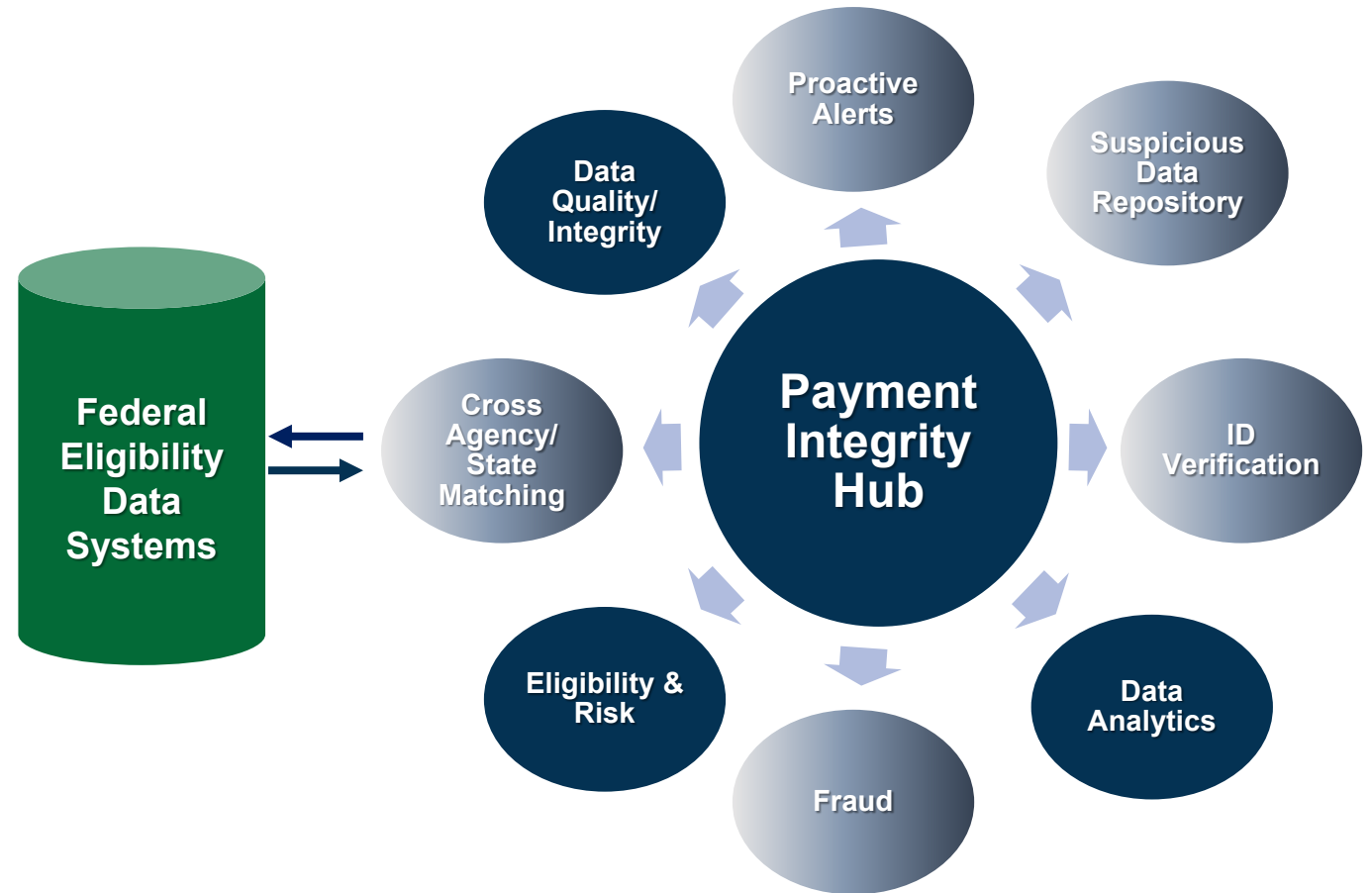
- Can address eligibility verification and dual enrollment universe (**\$10.5B estimate**)\*
- Future add Fraud and ID Verification sources
- Future add potential suspicious data repository, e.g., TINs, routing numbers

\*This estimate has been updated since this slide creation to reflect FY21 data. The universe is more than \$11B.

PIIA authorized access to DNP services for FFSA programs

- FFSA include Unemployment Insurance and Medicaid
- Fiscal Service has been working towards meeting Agency/FFSA needs via a single payment integrity hub
- Fiscal Service has continuous interactions with programs across multiple states and federal agencies
- Modularized services to adapt and meet evolving needs
- Actively sourcing customers to develop **dual enrollment and cross government** identification functionality

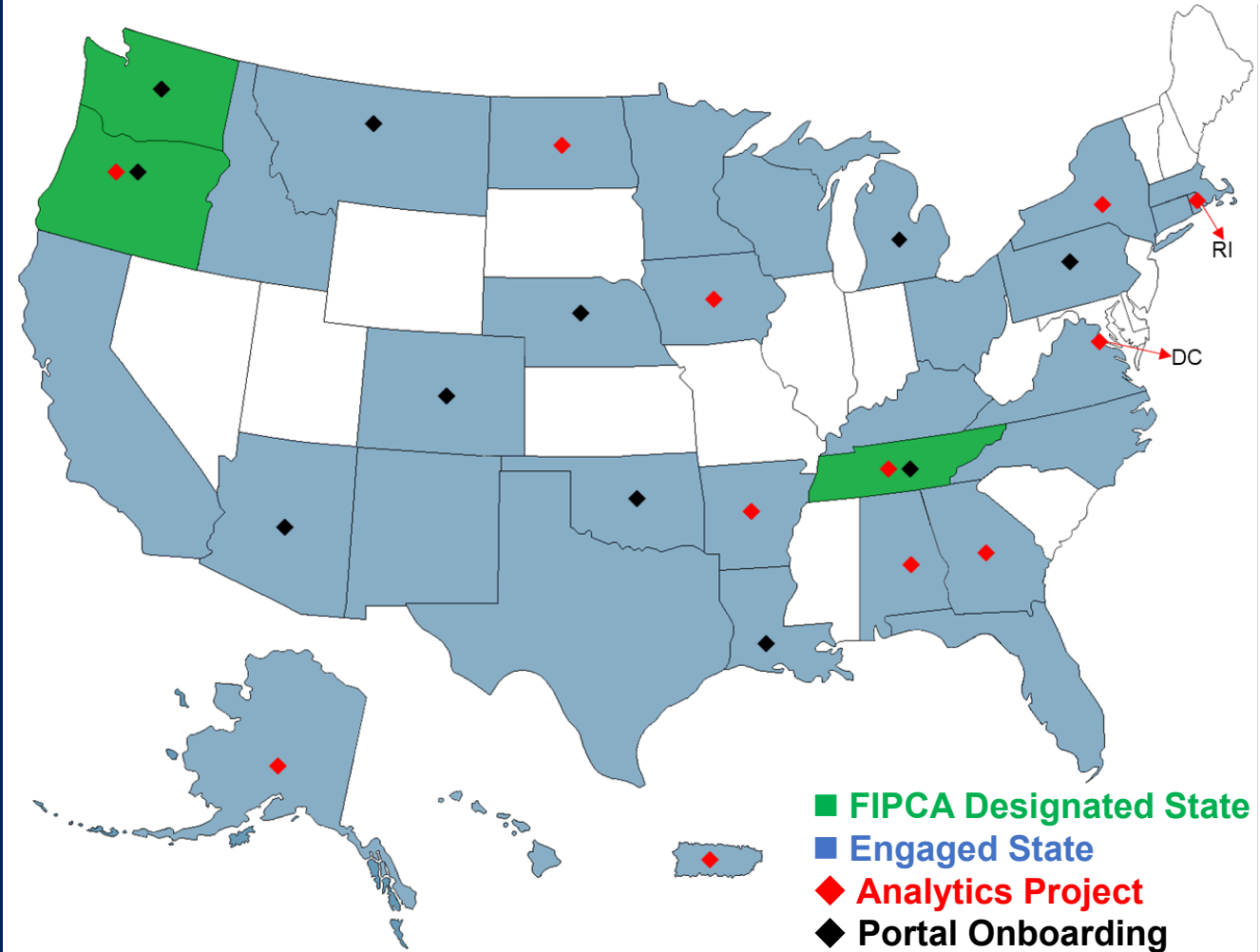
PIIA - Payment Integrity Information Act  
FFSA- Federally Funded State Administered



# State Outreach Success

❖ DNP has promoted its services to 82 programs across 37 states, two territories, and four Offices of Inspectors General

- 23 Analytics projects
- 9 portal enrollments
- Identified more than \$28.3M in potential improper payments
  - ✓ \$6.4M confirmed by customer
  - ✓ \$21.9M under investigation





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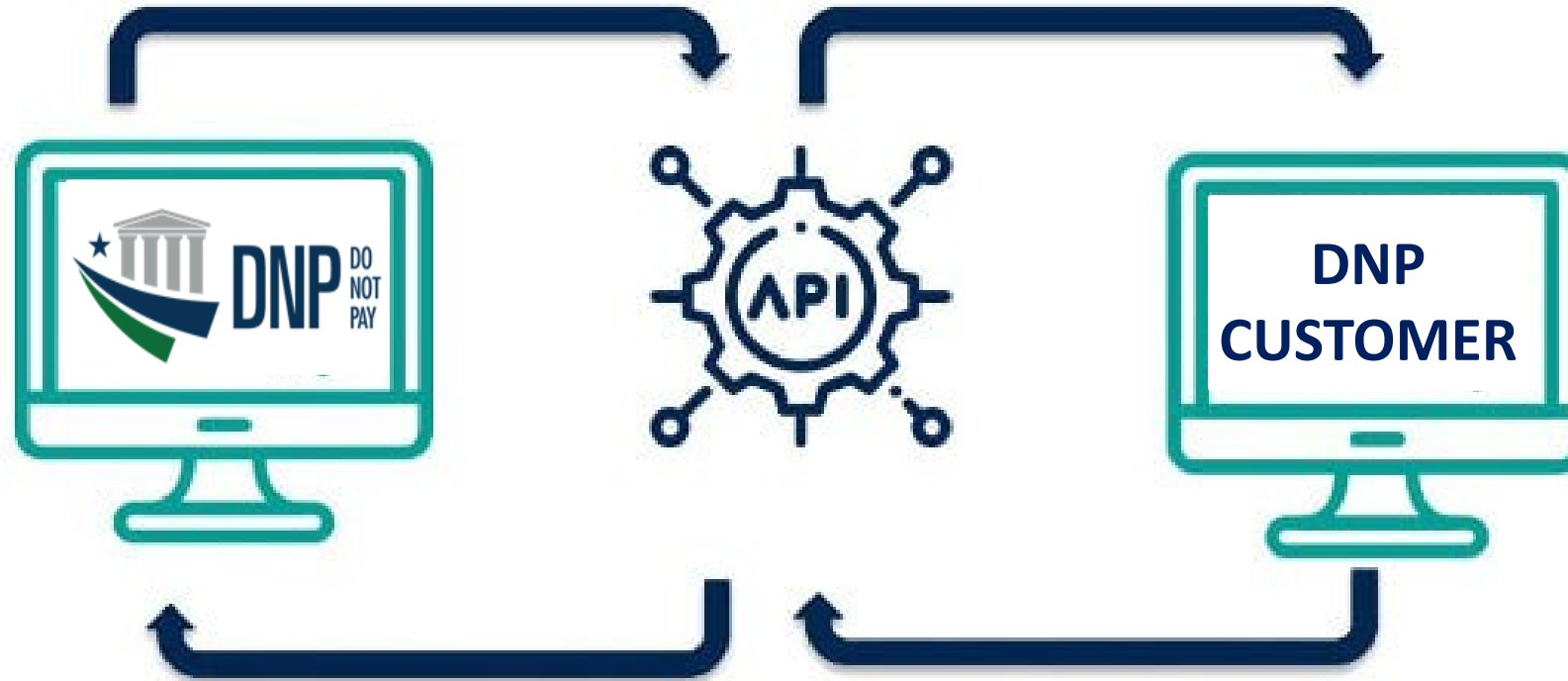
# Introducing Do Not Pay's Application Programming Interface (API)

**Steven Burbank**  
**Federal Reserve Bank, St. Louis**  
**September 2022**



# What is an API?

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# What is an API?

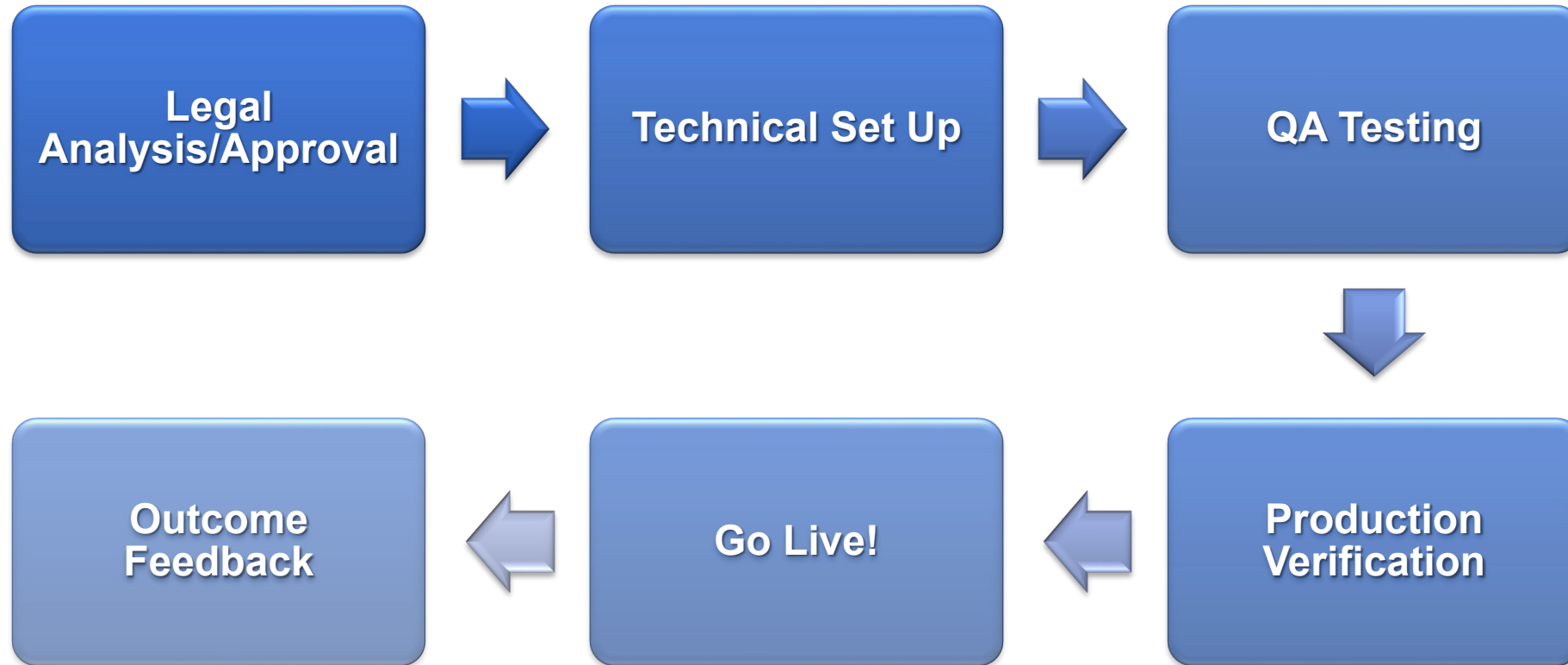
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A machine-to-machine interaction that takes place over a network, typically using the Hypertext Transfer Protocol (HTTP) used on the web.

- An API is a way for one software to access information from another software. An API takes the human aspect out of communicating between business lines and automates the process.
- The type of API offered by DNP is Representational State Transfer (REST). It defines the interface and conventions used between a web service provider and clients. REST is the most used and considered industry standard.
- In this case, your API would be the consumer of information and would be accessing information from DNP's databases – as we would be the provider.
- Essentially, the consumer is integrating DNP data into their own system.

# Process – High Level

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# API vs. Do Not Pay Portal

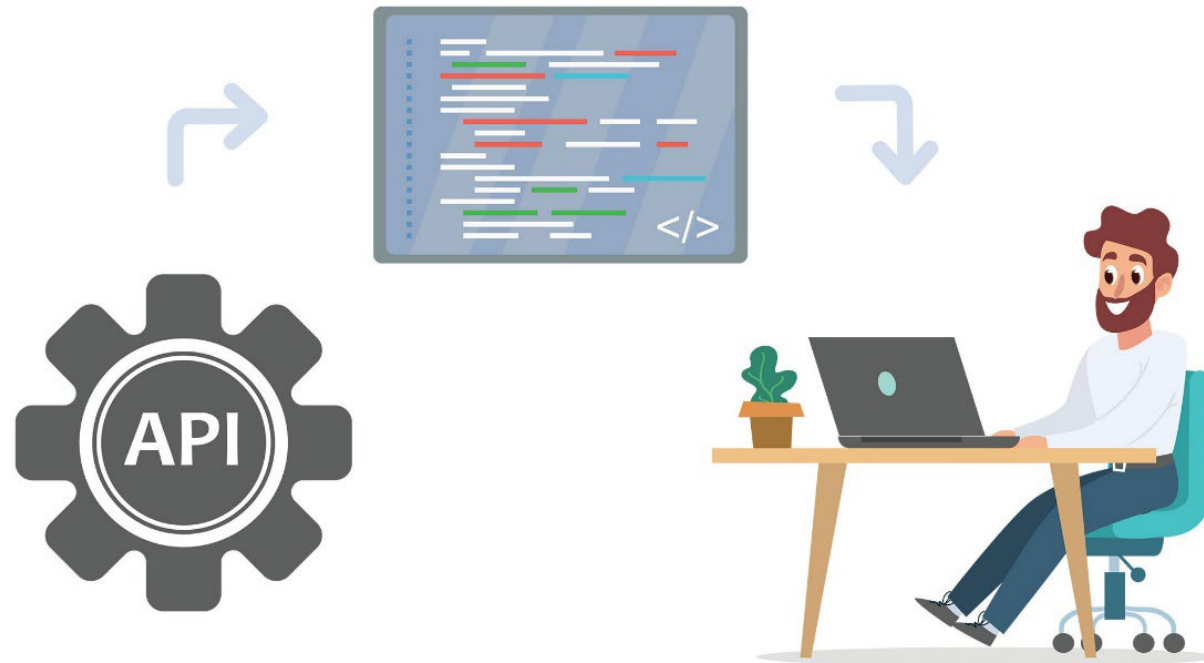
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- With the API, the consumer is integrating DNP data into their own system.
- DNP would assess the needs of your organization to help you make the decision on API vs. Portal.
  - Does the program need real time results or are daily results sufficient?
- Using the DNP Portal is a manual process of searching of DNP data sources.
- Portal requires people to log in and retrieve results.
- API does not require onboarding to portal.
- API can be an automated process.
- API returns results without you having to navigate to the appropriate functionality.

# Query Options: Option 1 - Single Record

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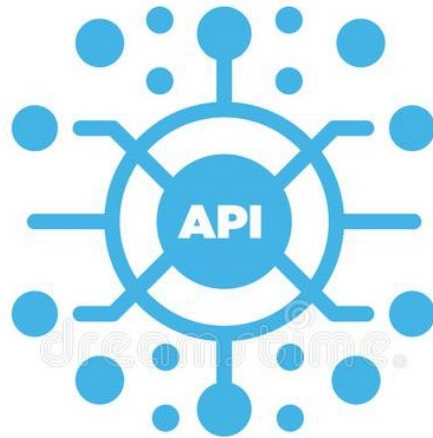
Single API call contains the search criteria of one entity to be matched against your agency's approved data source(s). The DNP response will include data source match results(s) for that single entity.



# Query Options: Option 2 - Multiple Record

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Multiple API call contains the search criteria of up to 100 entities to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for the searched entities.



# What Does DNP Do to Set Up?

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- Initial meeting to discuss expectations.
- Initial Questions document and Legal Questionnaire sent to agency.
- Garner legal approval.
- Assist agency with technical questions during system buildout.
- Issue client certificates (QA and Production).
- QA Testing.
- Assist with go-live.



# What Will You Do to Set Up?

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- Initial Meeting to discuss expectations.
- Complete the Initial Questions document and Legal Approval forms (DNP will guide you through the process).
- Once legal approval is given, the agency will be responsible for creating its API system.
- Test with DNP.
- Go live and give feedback on decision made (functionality can be built into API).



# What Will DNP Do With Your Feedback?

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- The API team can meet with Agency Outreach and discuss how agencies are using API to better serve the agency.
- Technical team can watch for hiccups.
- This helps DNP uncover ROIs.
- Testimonials are good for business.



# API Implementation Successes

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Agency/Program	Program	Go Live Date
Small Business Administration	Economic Injury Disaster Loan	June 2, 2021
Veterans Administration	Financial Services Center/Vendor Management Group	September 15, 2022
Health and Human Services	Grants Solutions Group	October 1, 2022

# Contact Information

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**For more information please contact:**

Do Not Pay Business Center  
[donotpay@fiscal.treasury.gov](mailto:donotpay@fiscal.treasury.gov)



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# **Do Not Pay Analytics Overview**

**Brian Hewitt**

**September 27, 2022**

# Introducing DNP Analytics

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The DNP Analytics Team is dedicated to delivering **analytical insights** and **innovative data solutions** that help you address your **payment integrity** and meet your mission.

Our team of professionals with extensive experience include:

- Analytics Consultants
- Data Scientists
- Data Analysts



# DNP Analytics Services

Analytic Solutions Team services range from consultation to fully-integrated data solutions that can be customized to your business.

IDENTIFICATION

PREVENTION



**Consultation**



**Data Analysis Services**



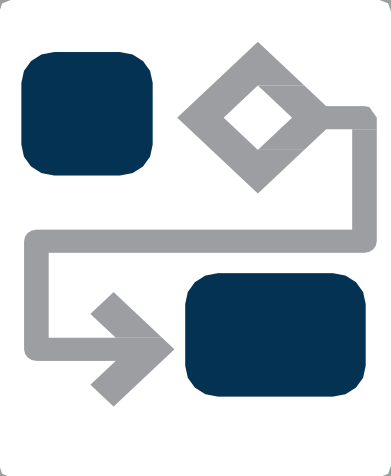
**Reusable Analytics Solution**



**Integrated Analytics Solution**

# Analytics Techniques

We employ advanced **data analysis techniques.**



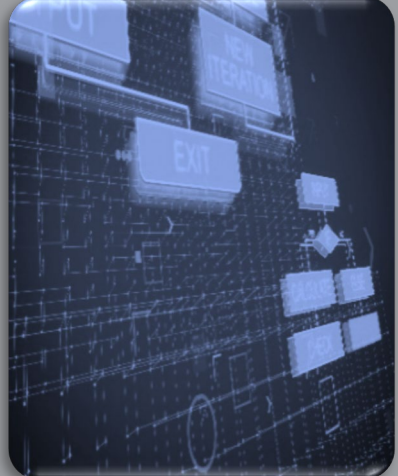
**Data Matching**



**Data Modeling**



**Risk Assessment**



**Advanced Algorithms**







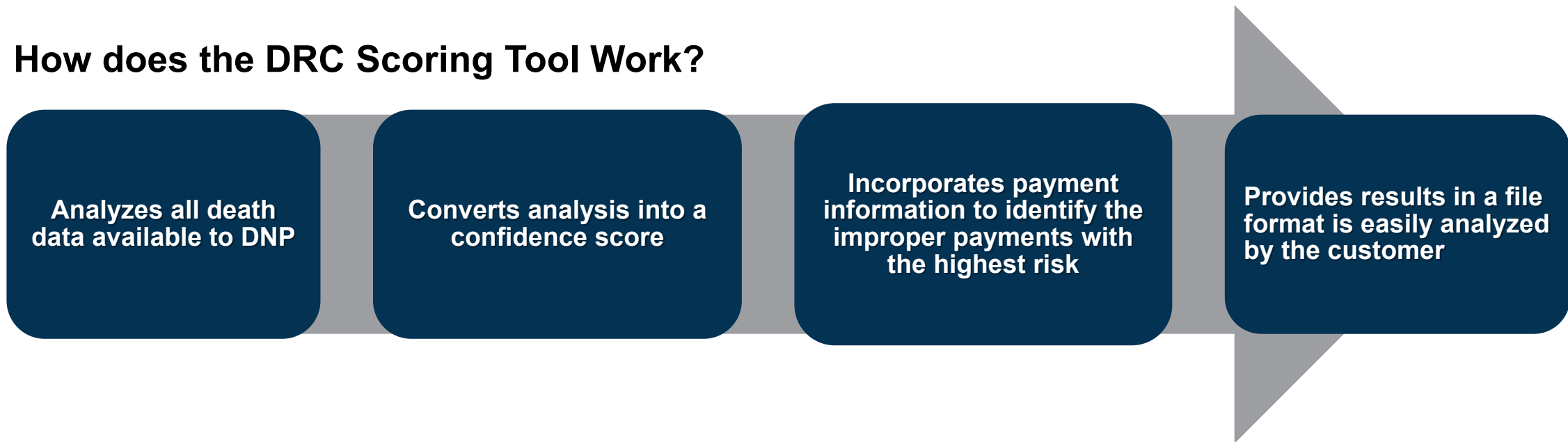
# Death Record Confidence (DRC) Scoring Tool

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## What is the DRC Scoring Tool?

- DNP analytics solution that helps customers optimize improper payment research
  - Enables the accurate identification of deceased individuals
  - Identifies at risk improper payments
  - Increases confidence in payment integrity and internal controls

## How does the DRC Scoring Tool Work?



# What are the Analytics-Only Data Sources

## DNP Agency Adjudication

Contains information from Do Not Pay customers regarding a determination of whether a payment is proper, improper, or under review as well as any comments associated with the determination.

**Use Cases:** Risk-Modeling to assist customers in prioritizing research that has been completed by other agencies and is more likely to result in a proper or improper determination.

## Health Care Provider

Center for Medicare/Medicaid Services National Plan and Provider Enumeration System (NNPES)

Contains information on approved health care providers and health plans. Data includes a National Provider Identifier which is unique to the business and is used across various government agencies.

**Use Cases:** Disaster Recovery related projects. Useful to verify disaster relief health care provider grantees at enrollment.

## Prisoner

Bureau of Prisons (BOP) Incarceration Database: Contains information regarding incarcerated individuals under the jurisdiction of the United States Attorney General.

**Use Cases:** Verify eligibility for benefits which are prohibited or adjusted for prisoners (Veterans' Health Benefits, Social Security, Means-Based benefits).

## Payments, Claims, and Reclamation Data

Philadelphia Financial Center (PFC) Reclamation Data: An extract of the Payments, Claims, and Enhanced Reconciliation (PACER) file, PFC has identified reason codes which are considered highly accurate indicators of a deceased recipient.

**Use Cases:** Additional high quality death data source; Identify deceased individuals that are not currently in other death data sources.

# Success Story: Oversight Program – Federal Benefit: Background



An oversight office partnered with DNP in its review of a Federal benefit program to identify the **value of using DNP services** to support their efforts in the identification and prevention of improper payments.

DNP analyzed **10M beneficiary records** to verify their eligibility and identify potentially fraudulent activity between 2020-2021 which includes COVID-19 relief funding.

The analysis included **data quality assessments, fraud risk assessments, and matching to death data sources** to verify whether beneficiaries were alive and/or eligible at the time of a payment.

# Success Story: Oversight Program – Federal Benefit: Analyses & Findings

Findings identified through individual analysis may not always appear suspicious on their own until compared to other records and/or analyses which could indicate a fraud network. As such, DNP compared the findings from five primary analyses to identify whether there were unexpected associations between the PII of different beneficiaries which may be a sign of potential fraud.

## Five Primary Analyses

### 1. **Death Data Source Matching**

**Finding:** \$38.6M in benefits were awarded to 2.2K beneficiaries that appear to have been deceased before or on the payment or claim date.

### 2. **Age Assessment**

**Finding:** \$26M in benefits were awarded to 1.6K beneficiaries that appeared older than 100 which is outside of the expected age range associated with this benefit.

### 3. **Email Alias**

\$809M in benefits were awarded to 42K beneficiaries that shared an email username and/or alias with a significant number of other beneficiaries

### 4. **Mailing Address**

\$6.8B in benefits were awarded to 386K beneficiaries that shared a mailing address with 10 or more additional beneficiaries

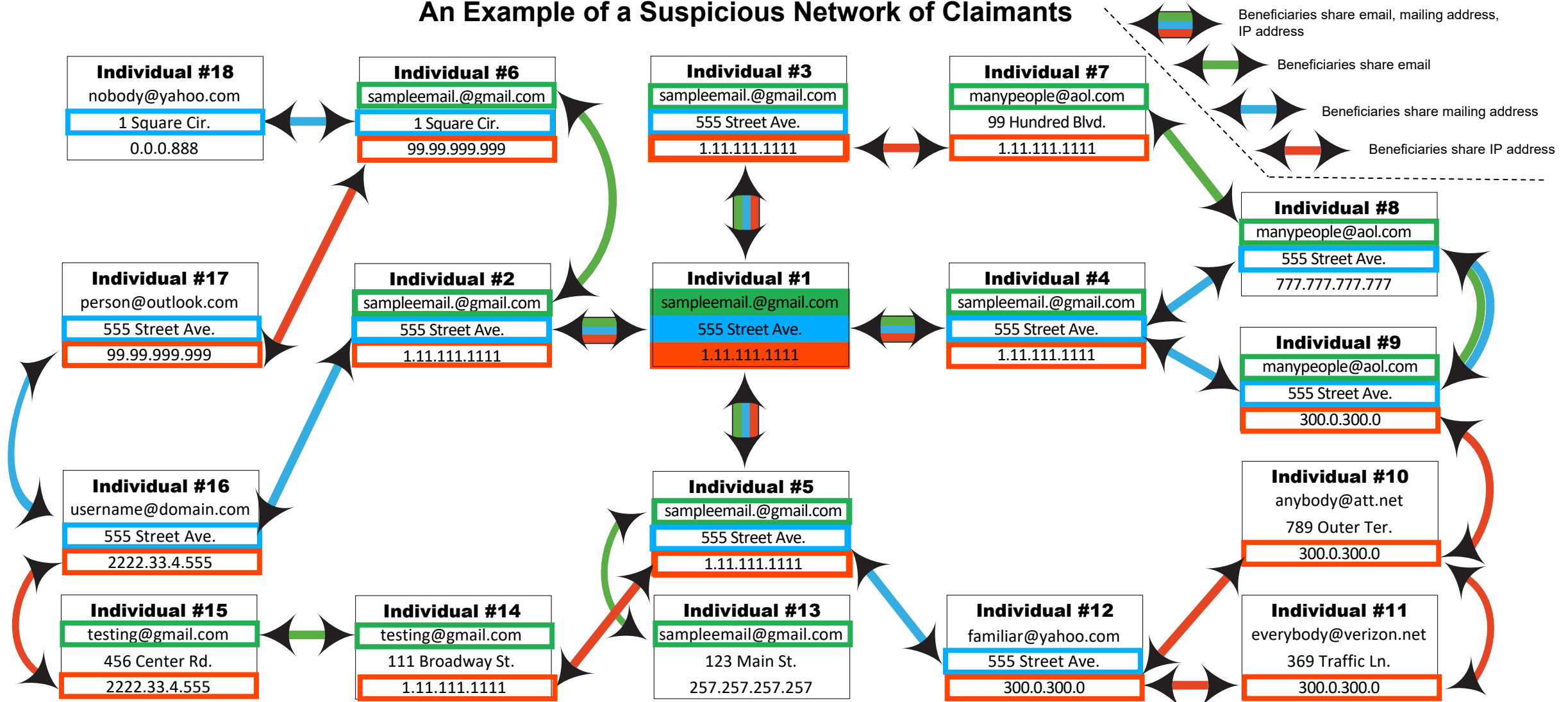
### 5. **IP Address**

1.4K distinct beneficiaries shared an IP address with at least 25 other beneficiaries on the same day



# Success Story: Oversight Program – Federal Benefit: Fraud Network Example

## An Example of a Suspicious Network of Claimants



# Contact Information

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Data Analytics Advisor  
202-874-5228  
[Brian.Hewitt@fiscal.treasury.gov](mailto:Brian.Hewitt@fiscal.treasury.gov)

*For more information, visit our website: <https://fiscal.treasury.gov/dnp/>*

# Why Do Not Pay (DNP)?

## Lessons Learned from SBA OIG

Data Analytics

SBA OIG

September 27, 2022





# Agenda

## 1. The Why

- Should your organization be utilizing DNP Data?
- Should it be a priority?

## 2. The How

- How do you get started?
- What do you need to bring to the table as a customer?
- Options for analysis and access.

## 3. The “So what!”





# Why Utilize DNP

## 1. Agencies are required to use it (The Payment and Integrity Information Act)

- Oversight includes reporting on improper payments made due to lack of DNP implementation
- Reporting on delayed timelines for implementation

## 2. Even when in-use, oversight still includes evaluating whether

- DNP data was implemented properly
- DNP data was used to determine eligibility
- Any gaps exist for the duration of benefit programs
- New data sources are implemented as they become available
- Improper payments resulted from selective implementation of DNP data sources



# Why Utilize DNP

## 3. It is Free and it is Federal

- Treasury is consolidating critical datasets in one place, saving time and resources
- DNP is a dedicated federal program, so you have continuous support

## 4. The DNP Business Center

- Offering analytics services
- Analysis is rigorous and includes multi-level QA
- Raw, aggregate results, documentation and methodologies provided
- Analysis from Treasury may carry additional weight



# How to Get Started

1. Conduct an overview of the Agency's current (or lack of) implementation
2. Contact the DNP Business Center
3. Contact your OIG's Legal Division – they'll need to engage for the MOU
4. Check out SBA OIG's Do Not Pay Audits:
  - [COVID-19 Economic Injury Disaster Loan \(EIDL\) Program](#)
  - [Paycheck Protection Program](#)



# What to Bring to the Table

1. Clear goals and objectives
2. A clean authoritative copy of the source data
3. Data dictionary
4. Data Subject Matter Expert (SME)
5. Time and availability for touchpoints throughout



# Options for Analysis and Access

## 1. Partnership Project with DNP Business Center (Analytics Team)

- DNP conducts the analysis
- Bring additional “Authority of Voice”
- Deeper level of analysis (beyond basic matching)

## 2. Self-Service

- Analysis beyond match results conducted by the OIG
- Engage training on the process and data sources prior to starting
- Options include API and Batch-Matching via the Portal



“So What???”

It's not why should you use Do Not Pay, but  
why shouldn't you???





**PICOE  
INVESTIGATIVE SUPPORT**

*PRESENTED BY*

**THE PAYMENT INTEGRITY CENTER OF EXCELLENCE (PICOE)**

**SEPTEMBER 27, 2022**



# PICOE Investigative Support

## Agenda

- ✓ PICOE's Purpose
- ✓ Actionable Outcomes
- ✓ Investigative Support
- ✓ Operational Metrics FY22
- ✓ Upcoming Event



# Payment Integrity Center of Excellence (PICOE)

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## PICOE'S PURPOSE

PICOE was created in 2019 to support agencies cross-governmentally to mitigate and prevent improper payments.



## PICOE'S PRIORITIES

- Reduce fraud, waste, abuse and improper payments
- Increase recovery of improperly paid funds
- Support investigative community in fraud deterrence
- Reduce deceased payees paid (across multiple agencies)
- Improve integrity of payment and post payment data

# Actionable Outcomes

Focus on Six Actionable Outcomes throughout the Payment Lifecycle



1

## Identify

*Identify the payment or payee that should not be paid*

2

## Prevent (Pre-Award, Pre-Payment)

*Prevent the award or payment before sending to Treasury*

3

## Recall (At time of Payment)

*Hold for further analysis or cancel payment before disbursement*

4

## Recover (Post-Payment)

*Request recovery of funds from the Financial Institution*

5

## Investigate

*Refer for investigation if potential criminal activity is suspected*

6

## Share

*Share outcomes and discoveries with stakeholder community*

# PICOE Investigative Support

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How do you submit a request for information/data?

Step 1: Complete a one-page Privacy Act Template and return to PICOE's shared email box:

[PaymentIntegrity@fiscal.treasury.gov](mailto:PaymentIntegrity@fiscal.treasury.gov)

Step 2: Privacy Act template is sent to Bureau of Fiscal Service (BFS) Privacy and Office of Chief Counsel (OCC) for approval

Step 3: After approval is received, the information/data will be sent to the requestor



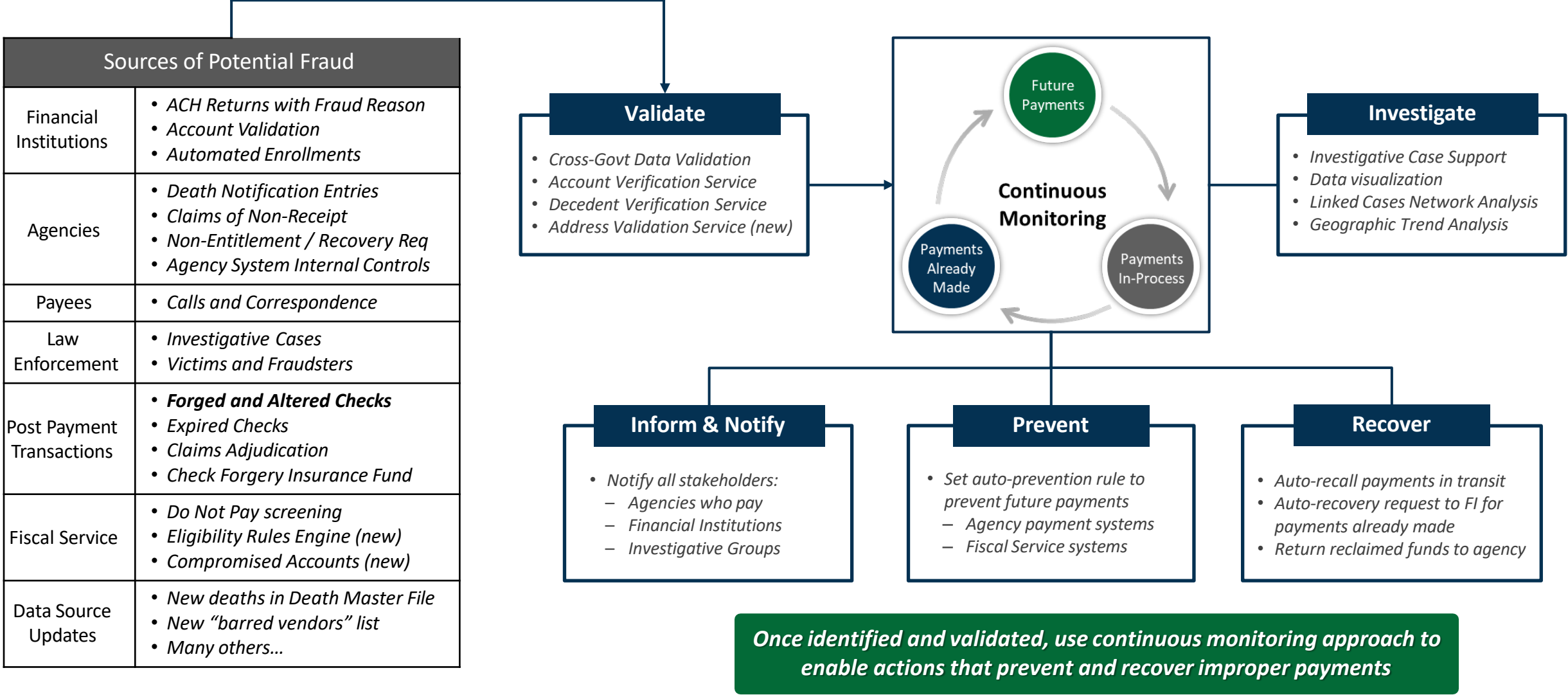
# PICOE Investigative Support

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- PICOE routinely supports IRS CI, TIGTA and IRS program areas with long term data sharing agreements as well as Ad hoc data requests and projects
- These are the only three agencies that PICOE can provide with IRS payment information
- PICOE is unable to provide non-IRS agencies with IRS Payment information; however, we will provide these requests to the BFS OCC for coordination with the requesting Agencies Counsel for a decision regarding what, if anything can be provided



# Sources of Fraud and Actionable Outcomes



# PICOE Operations FY22

**849**

**Data Requests**

**Responded to requests for data from 20 different customers/ agencies**

**15,619**

**Check images and payment details**

**Provided to customers from PACER, Frontier and FedImage**

**144**

**QDB Appeals**

**In PEGA, fielded & dispositioned handwriting appeals**

**\$9.5 M**

**Recovery Tool**

**Total improper payments recovered for agencies**

# Upcoming PICOE OIG Agency Engagement

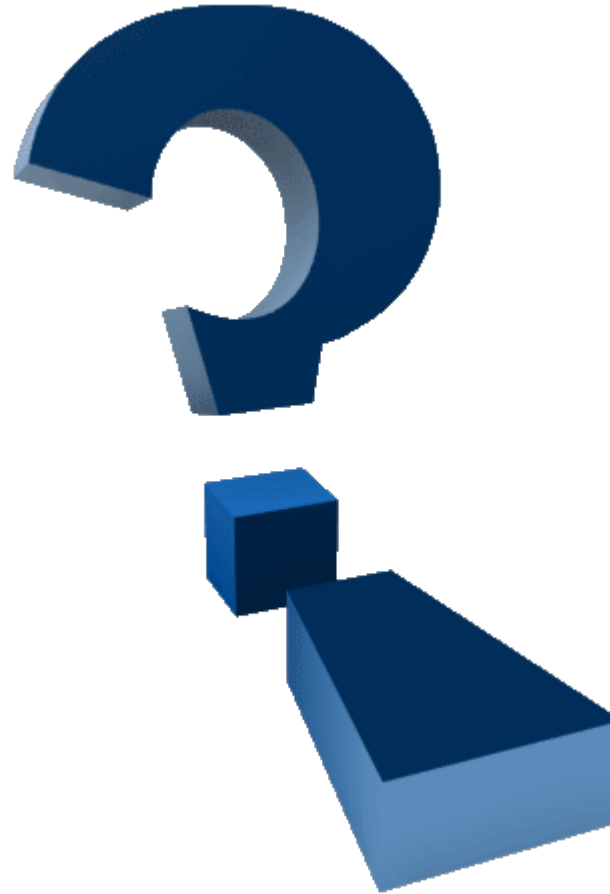
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- The Future of Fraud Detection - Investigative Solutions and Case Development
- Date: November 8, 2022
- Time: 1:00pm – 3:00pm EST
- Participation is open to all Federal agencies only
- There is no cost to attend
- This will be a Microsoft Teams virtual event



# Open Forum/Questions? Comments!

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and

**Be Great on Purpose!**