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General Comment

- 1) On the draft form section E column B, No IHE Established, to record agency error and cancellations for the reporting year? Also there is not a column to report not an IPV for tracking of negative action, is there supposed to be?
- 2) On the draft form section E column D, \$ IHE Established, but there is no column to record \$ established for IPV? Is there a reason for this or just a misprint and \$ established IPV will be on the new 366B form.
- 3) On the draft form section E column G, Investigation Costs, there are lines 1 and 2 reporting for Eligibility Fraud and Trafficking.

Is this going to be a total of all costs for all classifications of overpayment i.e.; cancellations, agency error, inadvertent household error, and intentional program violation and combining both eligibility fraud and trafficking together in the reporting time frame?

Does this cost include the investigation process, overpayment calculation process, and collection process together or just the investigation piece which is evidence gathering and not calculation/collection of the overpayment?

4) On the draft form section E column H, Investigation FTE, Number of FTE's can change throughout the reporting time frame. Is this going to be used to calculate Cost per investigation and or investigation costs? If so this may not be a valid indicator of costs.

5) Section E Column A (a) COMPLETED, REFERRED FOR ADH OR PROSECUTION, we utilize an adjudicator that will either get a stipulation or a default order, an administrative law judge if the customer requests a fair hearing, and pending on the threshold the IPV may be taken criminal utilizing our Attorney General. Will those IPV cases handled by an adjudicator by stipulation or default of the customer count also in this column or just those that go through an administrative hearing or legal prosecution?