

Responding to Potential Fraud in the Temporary Assistance for Domestic Violence Survivors Program



In the TA-DVS program, a person commits an Intentional Program Violation by intentionally and without intimidation or coercion by an abuser—

- **Making a false or misleading statement or misrepresenting, concealing, or withholding a fact for the purpose of establishing eligibility for or receiving a benefit from the TA-DVS program; or**
- **Committing any act intended to mislead or to conceal or withhold information for the purpose of establishing eligibility for or receiving benefit from the TA-DVS program.**

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Know where fraud is mostly likely to occur:

- False landlord statements or non-existent addresses
- Unreported or under-reported income
- Children not in the home and not expected to return in a reasonable period of time

Follow policy when making payments:

- Make payments by dual payee (both the client and vendor signs the check)
- It is also possible to do direct vendor (vendor signatures only) payments. (This is especially crucial if we suspect A&D issues)
- Consider alternative payment arrangements when moving clients out of state. Instead of giving the check to the client, arrange to pay for motels directly; purchase gift certificates for food; purchase pre-paid phone and/or gas cards; do vendor payment checks for the u-haul or truck rental agency.

Verify information that is questionable:

- We do not ask for documentation of the domestic violence, but we should ask questions that will help us identify the client's safety concerns related to domestic violence. Risk of further future domestic violence is one of the eligibility criteria for TA-DVS. If there is no safety concern, there is no eligibility for TA-DVS.
- We can ask for verification of landlord/lease agreements, call tax assessors to verify property ownership, request estimates for u-hauls, verify residency; ask for proof of pregnancy, etc., if we believe the information is questionable. *Note: We can waive some or all verification of these items if not available in time to meet an immediate safety need.*
- In roommate situations we still want to verify with the property owner that the "roommate" has authorization to sublet.
- We can check to see if the landlord is another client. Is this other client authorized to receive rental payments? Is or does this other client need to report the rental payments as income?

Ask Questions:

- Is this payment needed because of domestic violence or is the client being evicted due non-payment of rent? If not domestic violence related, is there a safety risk in not providing this payment?
- We should ask questions that will lead to the clients safety concerns and help in establishing the DV Assistance Agreement. If the person's story changes significantly, document the changes in the narrative or in the case record.

Determine what income is countable:

- For TA-DVS we are looking at immediately available income to determine eligibility, but we can look at income the client is expecting to receive within the 90 day eligibility period to meet part of their need.
- If a potential fraud situation includes unreported income, was the income controlled by the abuser or used to help the client flee the domestic violence situation.
- The DHS 1542, "Income & Benefit Calculation Sheet" can help you to decide what income should be counted and if the client has on-going income, what they can use to meet their own needs.

Investigate:

- In cases where it is suspected that fraud has been committed, (i.e. false or forged leases, landlord agreements), we can ask our investigators to look into the situation.
- We would be looking at whether the client acted as a result of coercion by the abuser; what safety implications in pursuing the investigation (for either client or investigator)
- If the potential fraud situation is around children being in the home, we need to determine whether it was reasonable to believe the client intended to have the child returned to the home once safety was established (proceed with caution if the child is in the custody of a potential abuser).

Pursue overpayments:

We would pursue overpayments in TA-DVS cases when they were a result of intentional program violation and they were not a result of coercion and there were no known safety implications in pursuing those overpayments.

Consultation:

If a domestic violence situation is questionable, you can consult with your local domestic violence service provider and have them help determine what the safety concerns are for the victim and her children. You can also staff the case with your district domestic violence point person or the central office Domestic Violence Intervention Program Analyst.

For more information on domestic violence intervention within Self Sufficiency Programs, contact Carol Krager, DV Intervention Program Analyst (503) 945-5931. For information on investigation of domestic violence contact the local investigator or Investigations Unit.