BRIDGING THE GAP FROM ENTERPRISE RISK MANAGEMENT TO ACHIEVING MISSION OBJECTIVES: FRAUD RISK MANAGEMENT

Council of the Inspectors General on Integrity and Efficiency (CIGIE) 2019 Federal Audit Executive Council (FAEC) Annual Conference

September 6, 2019

Dan Kaneshiro

Senior Policy Analyst

OFFICE OF MANAGEMENT AND BUDGET

Value Proposition of ERM: "Two Things"

One of the value propositions of Enterprise Risk Management (ERM) is even in early stages of maturity, it can drive the following two things:

1) Risk-Informed Discussions

2) Risk-Informed Decisions

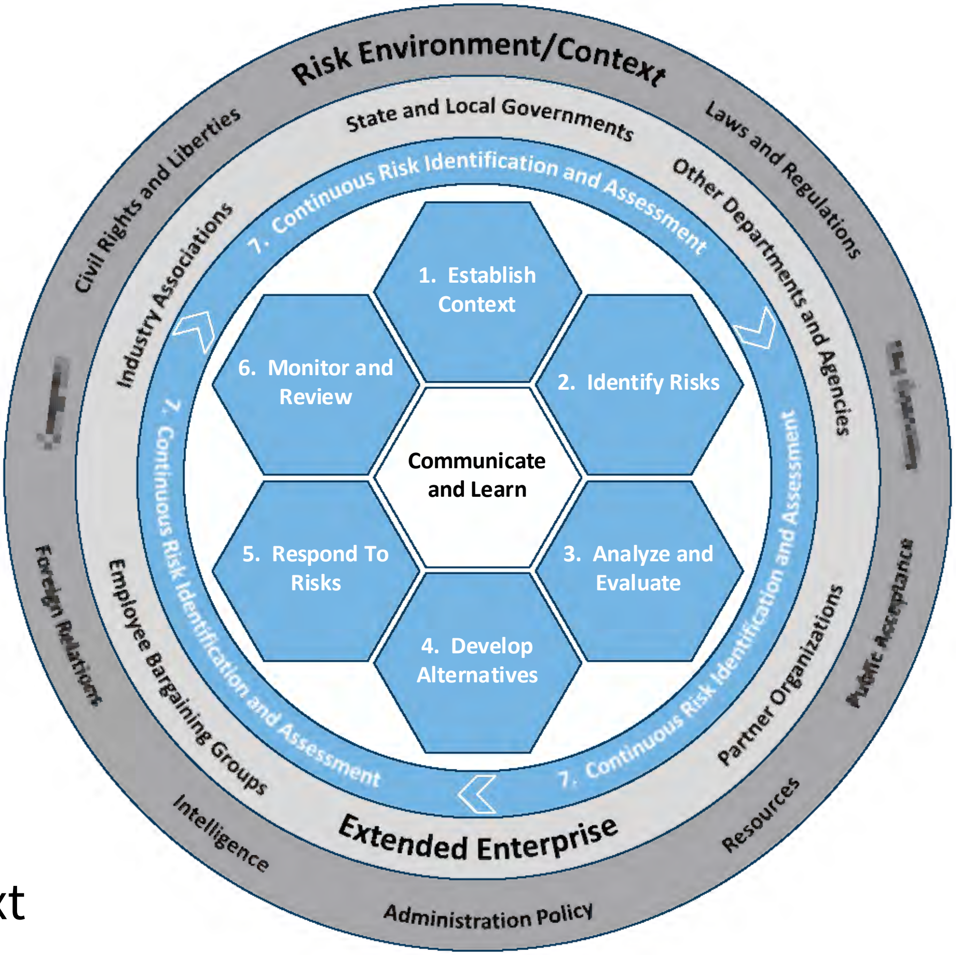
A-123: Enterprise Risk Management Model

Overview:

- **7 Cyclical Components**
  - Establish the Context
  - Identify Risks
  - Analyze and Evaluate
  - Develop Alternatives
  - Respond to Risks
  - Monitor and Review
  - Continuous Risk Identification and Awareness

- **3 Enterprise Components**
  - Communicate and Learn
  - Extended Enterprise
  - Risk Environment/Context

Illustrative Example of an Enterprise Risk Management Model



A-123: Fraud Risk Management Requirements

III. Establishing and Operating An Effective System of Internal Control.

- **Establishing Entity Level Control.**
  - **Managing Fraud Risk in Federal Programs.**

- Risk Profiles – Agencies must include an evaluation of fraud risks including:
  - Fraud as defined by the GAO Green Book.
  - A risk-based approach to design and implement financial and administrative control activities to mitigate identified material fraud risks.
  - Fraud risk may be organized under the operational objectives of the risk profile.
  - Agencies may determine that they have low likelihood or impact of fraud.
- GAO Fraud Risk Framework – Agencies should adhere to leading practices when:
  - Establishing entity level controls.
  - Establishing risk tolerances in disaster situations.

VII. Other Considerations.

- Agencies must consider fraud risk in strategic plans and ensure appropriate officials receive training on fraud indicators and risks related to:
  - Conducting Acquisition Assessments.
  - Managing Grant Risks in Federal Programs.

Integration with ERM: Fraud Working Group

Risk Appetite and Risk Tolerance

Risk Appetite

- The broad-based amount of risk an organization is willing to accept in pursuit of its mission/vision.
- Established by the organization's most senior level leadership
- Serves as the guidepost to set strategy and select objectives.

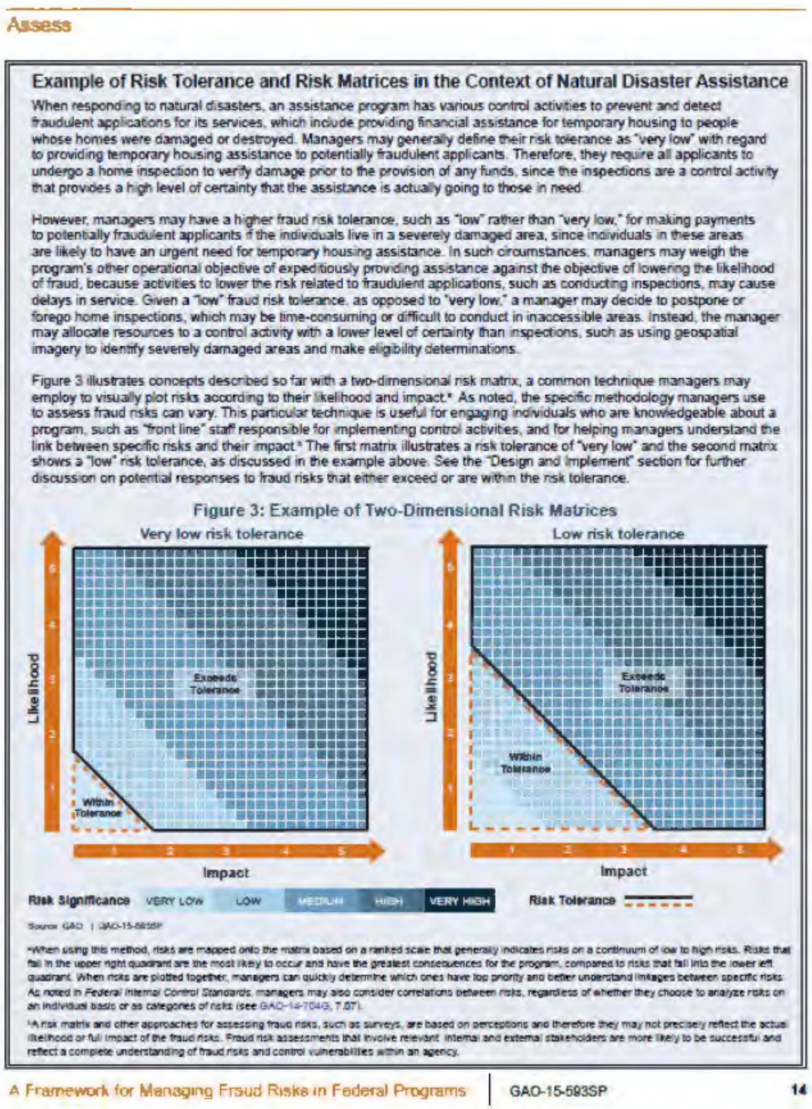
Risk Tolerance

- Acceptable level of variance in performance relative to the achievement of objectives.
- Established at the program, objective or component level.
- Management considers the relative importance of the related objectives and aligns risk tolerance with risk appetite.

Establishing Tolerances in Disaster Situations

The **GAO Fraud Risk Management Framework** includes an example of Risk Tolerance and Risk Matrices in the Context of Natural Disaster Assistance which both aligns and complements current guidance in **A-123** and **M-18-14**.

- **A-123 and M-18-14:** "Risk tolerance reflects a Federal manager's willingness to accept a higher level of fraud risks and may vary depending on the circumstances of the program."
- **A-123 and M-18-14:** "When determining risk tolerances in disaster situations, managers must weigh the program's operational objectives against the objective of lowering the likelihood of fraud."



Assess

Example of Risk Tolerance and Risk Matrices in the Context of Natural Disaster Assistance

When responding to natural disasters, an assistance program has various control activities to prevent and detect fraudulent applications for its services, which include providing financial assistance for temporary housing to people whose homes were damaged or destroyed. Managers may generally define their risk tolerance as "very low" with regard to providing temporary housing assistance to potentially fraudulent applicants. Therefore, they require all applicants to undergo a home inspection to verify damage prior to the provision of any funds, since the inspections are a control activity that provides a high level of certainty that the assistance is actually going to those in need.

However, managers may have a higher fraud risk tolerance, such as "low" rather than "very low," for making payments to potentially fraudulent applicants if the individuals live in a severely damaged area, since individuals in these areas are likely to have an urgent need for temporary housing assistance. In such circumstances, managers may weigh the program's other operational objective of expeditiously providing assistance against the objective of lowering the likelihood of fraud, because activities to lower the risk related to fraudulent applications, such as conducting inspections, may cause delays in service. Given a "low" fraud risk tolerance, as opposed to "very low," a manager may decide to postpone or forego home inspections, which may be time-consuming or difficult to conduct in inaccessible areas. Instead, the manager may allocate resources to a control activity with a lower level of certainty than inspections, such as using geospatial imagery to identify severely damaged areas and make eligibility determinations.

Figure 3 illustrates concepts described so far with a two-dimensional risk matrix, a common technique managers may employ to visually plot risks according to their likelihood and impact.[a] As noted, the specific methodology managers use to assess fraud risks can vary. This particular technique is useful for engaging individuals who are knowledgeable about a program, such as "front line" staff responsible for implementing control activities, and for helping managers understand the link between specific risks and their impact.[b] The first matrix illustrates a risk tolerance of "very low" and the second matrix shows a "low" risk tolerance, as discussed in the example above. See the "Design and Implement" section for further discussion on potential responses to fraud risks that either exceed or are within the risk tolerance.

Figure 3: Example of Two-Dimensional Risk Matrices

Source: GAO | GAO-15-593SP

[a] When using this method, risks are mapped onto the matrix based on a ranked scale that generally indicates risks on a continuum of low to high risks. Risks that fall in the upper right quadrant are the most likely to occur and have the greatest consequences for the program, compared to risks that fall into the lower left quadrant. When risks are plotted together, managers can quickly determine which ones have top priority and better understand linkages between specific risks. As noted in *Federal Internal Control Standards*, managers may also consider correlations between risks, regardless of whether they choose to analyze risks on an individual basis or as categories of risks (see GAO-14-704G, 7.07).

[b] A risk matrix and other approaches for assessing fraud risks, such as surveys, are based on perceptions and therefore they may not precisely reflect the actual likelihood or full impact of the fraud risks. Fraud risk assessments that involve relevant internal and external stakeholders are more likely to be successful and reflect a complete understanding of fraud risks and control vulnerabilities within an agency.

A Framework for Managing Fraud Risks in Federal Programs | GAO-15-593SP 14

The House With a Basement and an Attic

Innovation

Efficiency

Compliance

Non-Compliance

The Red Iceberg

Questions

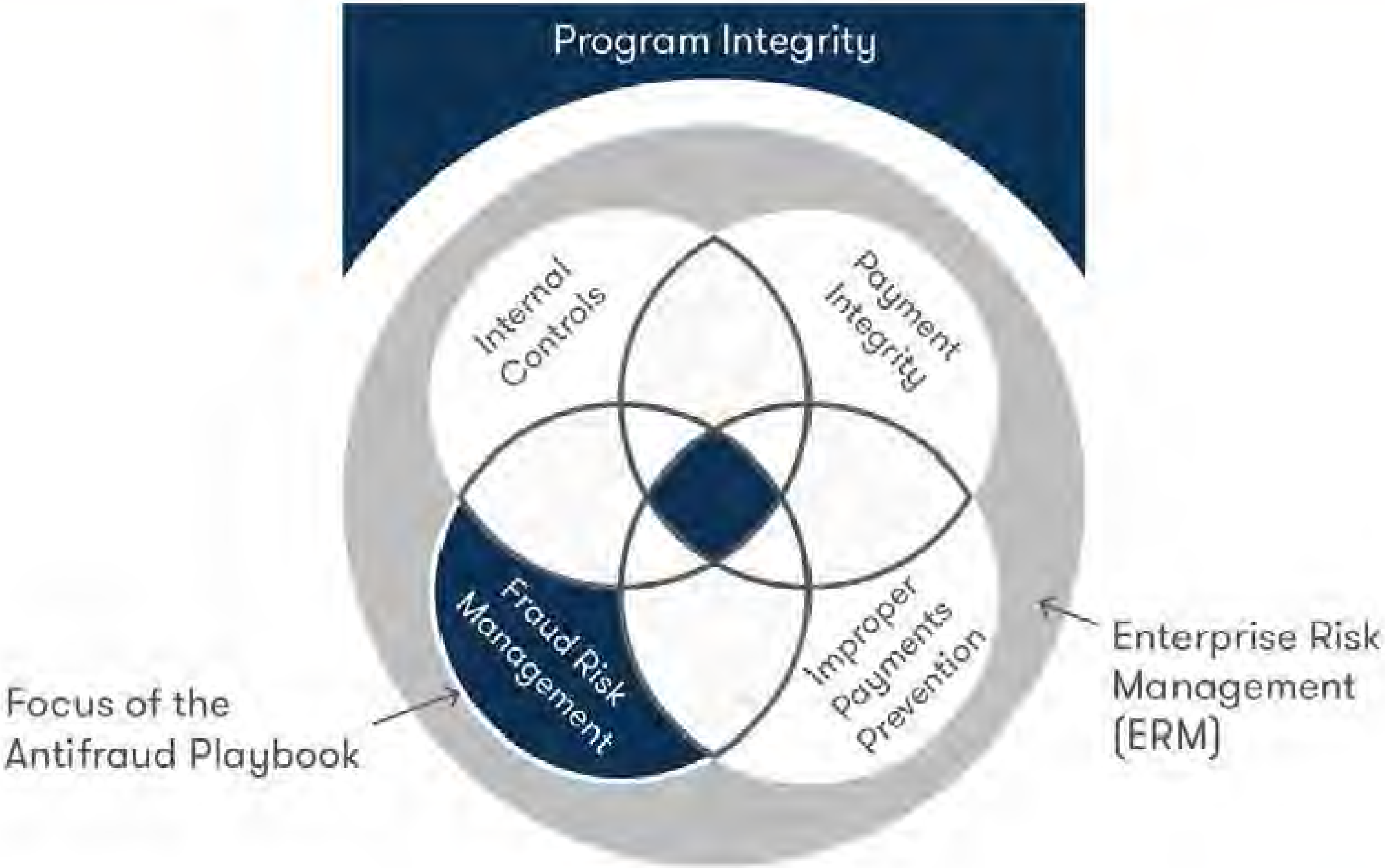
Dan Kaneshiro DKaneshiro@omb.eop.gov

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

Together We Can Be More Effective In Addressing Improper Payments including Fraud

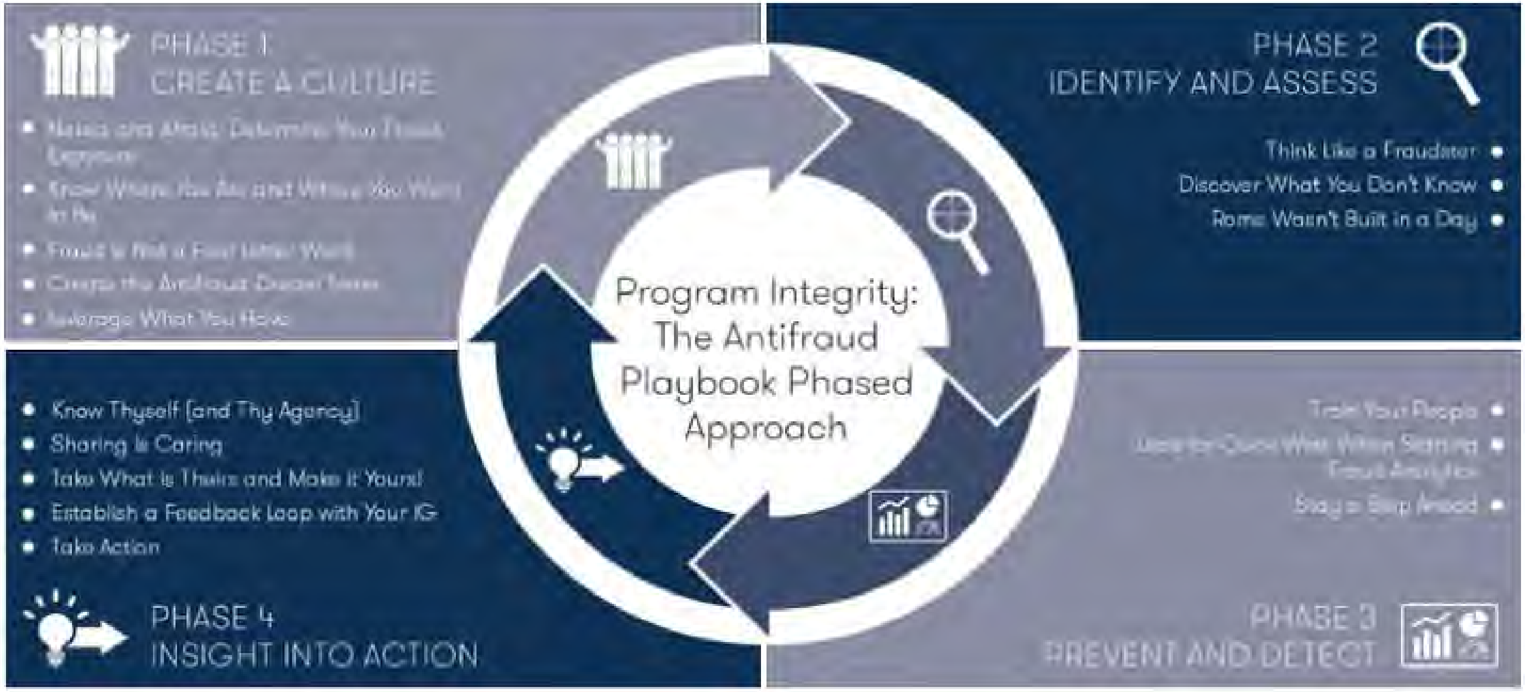
September 6, 2019

Program Integrity


Program Integrity
Internal Controls
Payment Integrity
Fraud Risk Management
Improper Payments Prevention
Focus of the Antifraud Playbook
Enterprise Risk Management (ERM)

The Antifraud Playbook Contents

16 Antifraud Plays Organized into Four Phases



PHASE 1
CREATE A CULTURE

- Nature and Nurture: Determine Your Fraud Exposure
- Know Where You Are and Where You Want to Be
- Fraud Is Not a Four Letter Word
- Create the Antifraud Dream Team
- Leverage What You Have

PHASE 2
IDENTIFY AND ASSESS

- Think Like a Fraudster
- Discover What You Don't Know
- Rome Wasn't Built in a Day

Program Integrity: The Antifraud Playbook Phased Approach

- Train Your People
- Look for Quick Wins When Starting Fraud Analytics
- Stay a Step Ahead

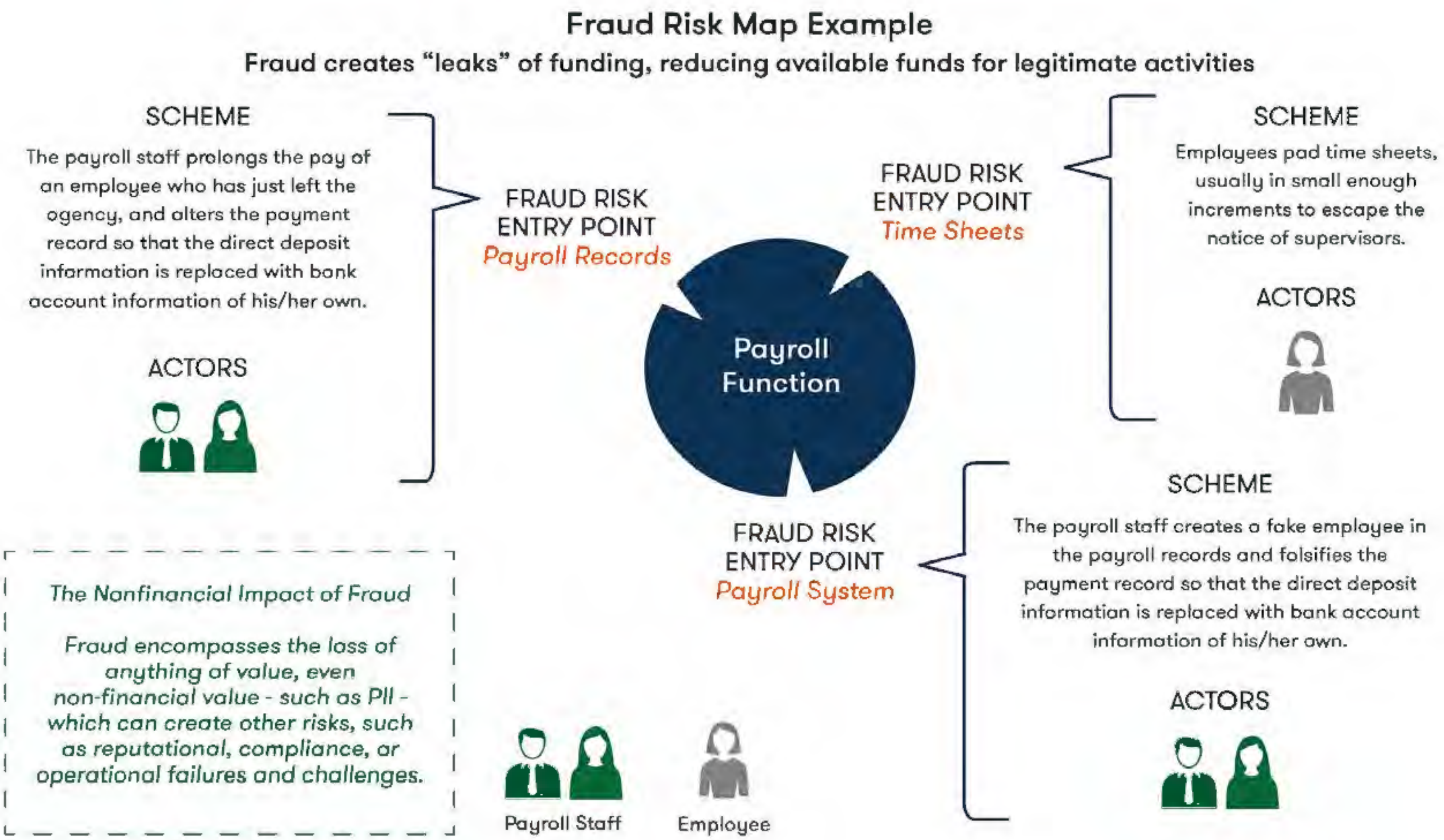
PHASE 3
PREVENT AND DETECT

- Know Thyself (and Thy Agency)
- Sharing is Caring
- Take What is Theirs and Make it Yours!
- Establish a Feedback Loop with Your IG
- Take Action

PHASE 4
INSIGHT INTO ACTION

https://cfo.gov/fraudprevention

Play 5 Think Like a Fraudster



Fraud Risk Map Example

Fraud creates "leaks" of funding, reducing available funds for legitimate activities

SCHEME

The payroll staff prolongs the pay of an employee who has just left the agency, and alters the payment record so that the direct deposit information is replaced with bank account information of his/her own.

ACTORS

FRAUD RISK ENTRY POINT
Payroll Records

FRAUD RISK ENTRY POINT
Time Sheets

SCHEME

Employees pad time sheets, usually in small enough increments to escape the notice of supervisors.

ACTORS

Payroll Function

FRAUD RISK ENTRY POINT
Payroll System

SCHEME

The payroll staff creates a fake employee in the payroll records and falsifies the payment record so that the direct deposit information is replaced with bank account information of his/her own.

ACTORS

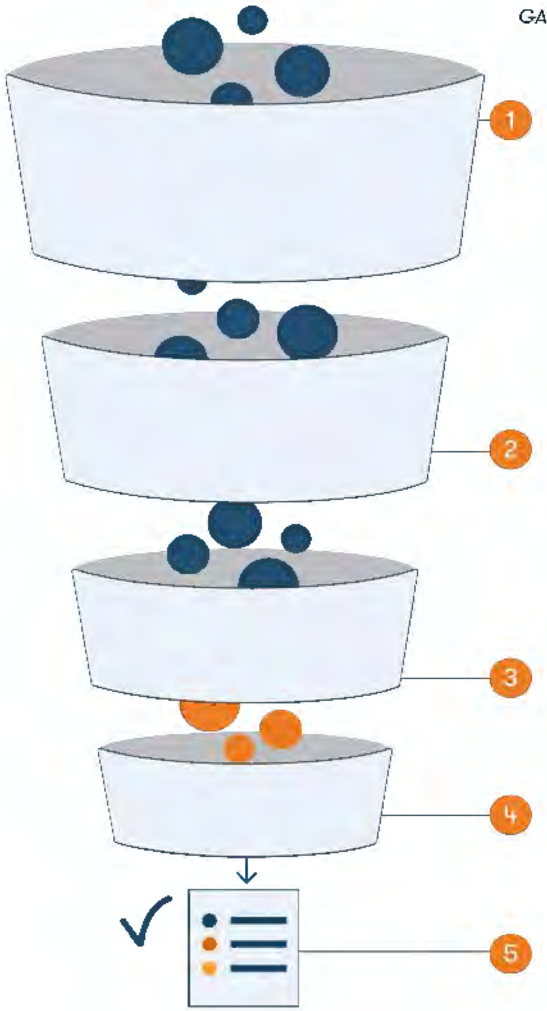
The Nonfinancial Impact of Fraud

Fraud encompasses the loss of anything of value, even non-financial value - such as PII - which can create other risks, such as reputational, compliance, or operational failures and challenges.

Payroll Staff

Employee

Play 6 – Discover What You Don't Know



GAO Guidance

1 Identify inherent fraud risks

2 Assess likelihood and impact of inherent risks

3 Determine fraud risk tolerance

4 Determine and prioritize residual fraud risks

5 Document program's fraud risk profile

Playbook Checklist

□ **Leverage** your Fraud Risk Map (See Play 6) to understand the potential entry points for fraud

□ **Identify** your preferred risk assessment technique (See Key Points) and –

- o Gather information on the controls and processes in place
- o Determine if and how the controls and processes in place could be exploited or circumvented
- o Determine the likelihood and impact of given schemes being successful

For example, you could conduct focus groups with stakeholders that know the controls and processes related to the fraud schemes you plan to assess and discuss the controls and processes in place related to the fraud schemes identified, the strength of those controls, and the potential likelihood and impact of the schemes.

□ **Document** the results of your risk assessment. For example, you can document final likelihood and impact scores for given fraud schemes in addition to any identified controls gaps in your Fraud Risk Map (See Illustration).

□ **Translate** the fraud schemes into specific risks. For example, if the fraud scheme you were discussing related to a contractor overbilling for services, the specific risks you might identify include

- o Contractors bill for goods or services that were not provided. which results in financial loss to the agency.
- o Contractors overbill for goods or services that were provided, which results in financial loss to the agency.

These specific risks should align to the fraud schemes assessed, but call out the specific risk associated with the scheme. In the examples above, the risk we identified was financial loss, but it can be anything you may discuss or identify in your assessment as a potential risk of the particular fraud scheme.

□ **Prioritize** risks based on the results of the assessment. For example, you can prioritize risks can be based on likelihood and impact scores or strategic priorities.

Note: We recommend focusing on residual risks at this stage because those are the risks you will be focused on mitigating, see Key Points.

□ **Establish** thresholds above which the component (See Play 8) you are assessing feels it is necessary, from a cost or reputational standpoint, to avoid and what you are willing to accept or share in terms of fraud risk.

Note: You will never get to "zero" fraud, so you may decide not to dedicate resources to risks that are deemed unlikely or low-impact.

□ **Document** prioritized risks including key pieces of information such as the likelihood and impact score, the existing controls, any identified gaps, and response – or mitigation activities – you will put in place to address the risk.

□ **Document** your fraud risk profile based on your risk tolerance, prioritized risks and overall results of the assessment process.

Payment Integrity Center of Excellence

VISION

to be a trusted **Governmentwide partner to provide actionable business insights and solutions** that transform how Government agencies approach identification, prevention, stopping, and recovery of improper payments and related fraudulent activity.

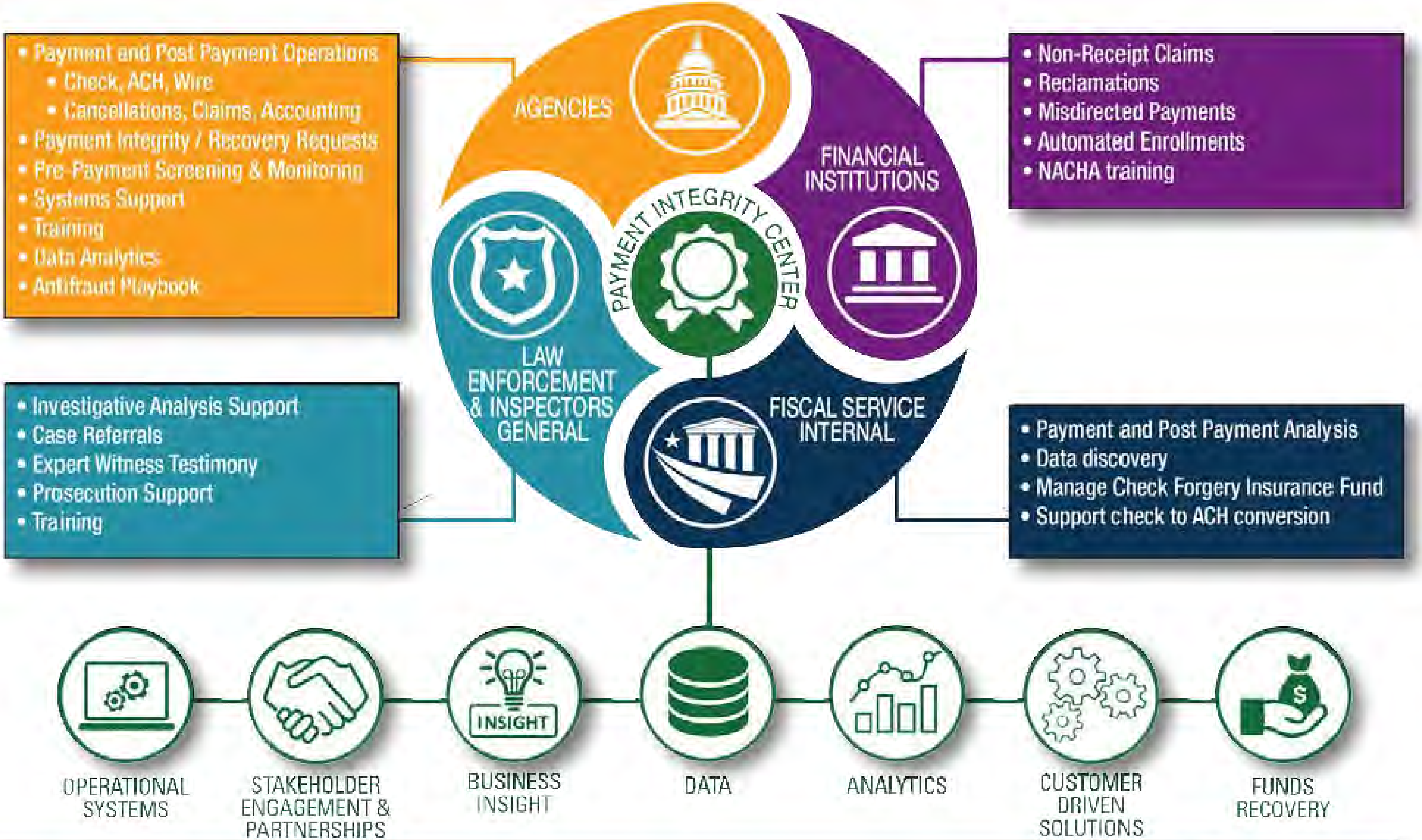
MISSION

to provide **Governmentwide partnership, guidance, and solutions** that aid in the prevention of improper payments and fraud, waste and abuse.

GOALS

Improve the integrity of Government-wide financial transactions by providing business insight and solutions that assist Government agencies in identifying, preventing, and recovering improper payments.

Payment Integrity Stakeholders & Services



- Payment and Post Payment Operations
  - Check, ACH, Wire
  - Cancellations, Claims, Accounting
- Payment Integrity / Recovery Requests
- Pre-Payment Screening & Monitoring
- Systems Support
- Training
- Data Analytics
- Antifraud Playbook

AGENCIES

- Non-Receipt Claims
- Reclamations
- Misdirected Payments
- Automated Enrollments
- NACHA training

FINANCIAL INSTITUTIONS

PAYMENT INTEGRITY CENTER

LAW ENFORCEMENT & INSPECTORS GENERAL

- Investigative Analysis Support
- Case Referrals
- Expert Witness Testimony
- Prosecution Support
- Training

FISCAL SERVICE INTERNAL

- Payment and Post Payment Analysis
- Data discovery
- Manage Check Forgery Insurance Fund
- Support check to ACH conversion

OPERATIONAL SYSTEMS

STAKEHOLDER ENGAGEMENT & PARTNERSHIPS

BUSINESS INSIGHT

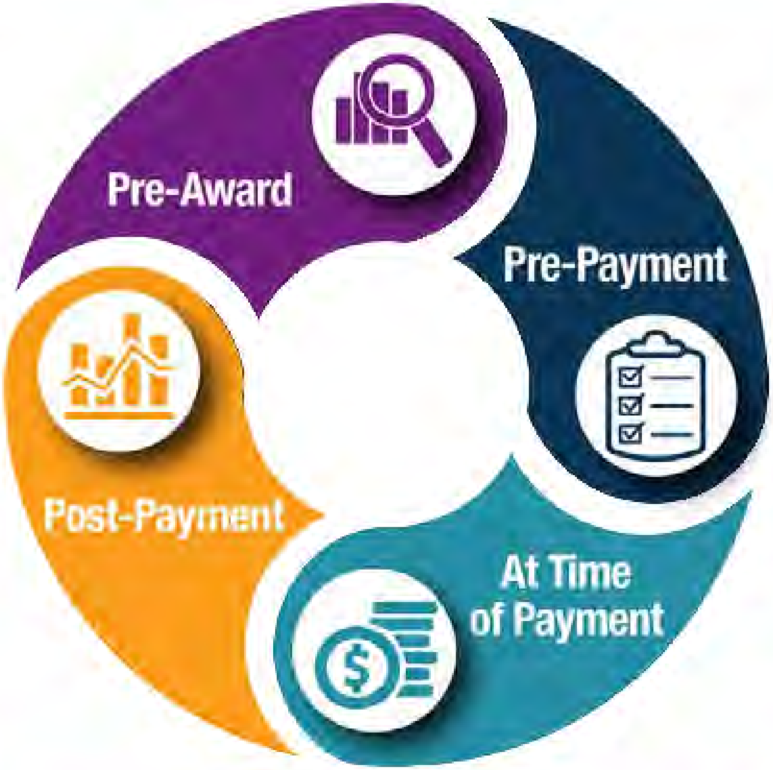
DATA

ANALYTICS

CUSTOMER DRIVEN SOLUTIONS

FUNDS RECOVERY

Payment Integrity Throughout the Payment Lifecycle



Identify people who shouldn't be paid & payments that should not have been made

1. ***Identify Improper Payments***

   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 criminal activity is determined

6. ***Share***

   Share outcomes and discoveries with stakeholder community

Payment Integrity Solution Lifecycle

Repeatable process for development of Payment Integrity Solutions

1 **UNDERSTAND BUSINESS PROBLEM**

Collaborate with customers, understand business needs

2 **DEVELOP CUSTOMER-CENTRIC SOLUTION**

Develop innovative analytical solutions with business insights

3 **IMPLEMENT SOLUTION**

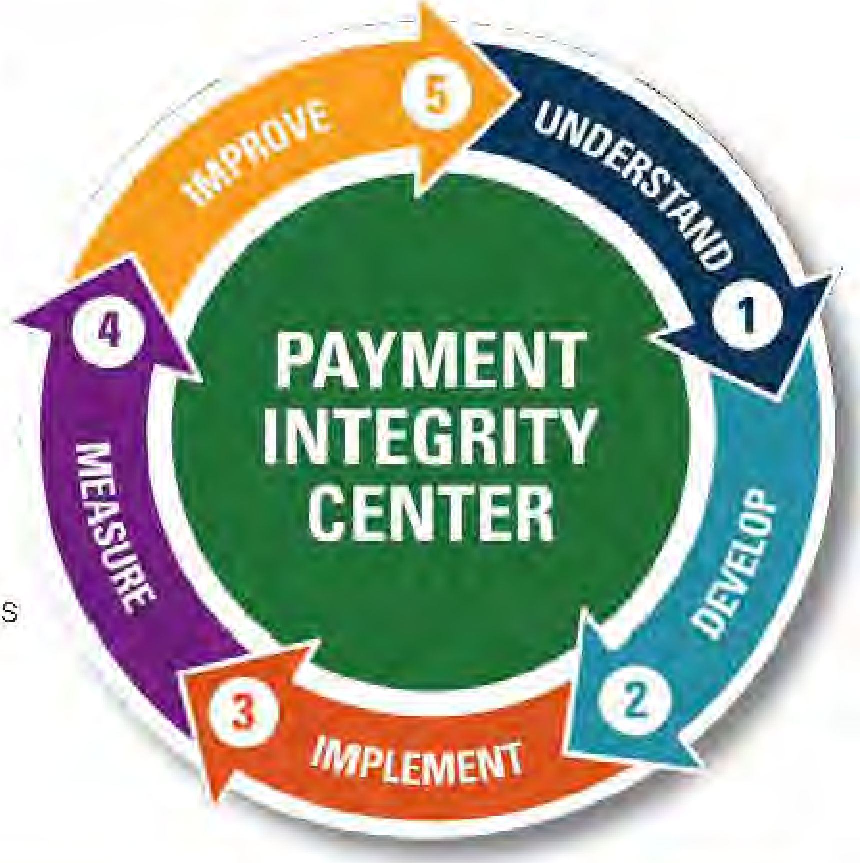
Provide actionable and tangible outcomes that solve operational business problems.

4 **MEASURE VALUE**

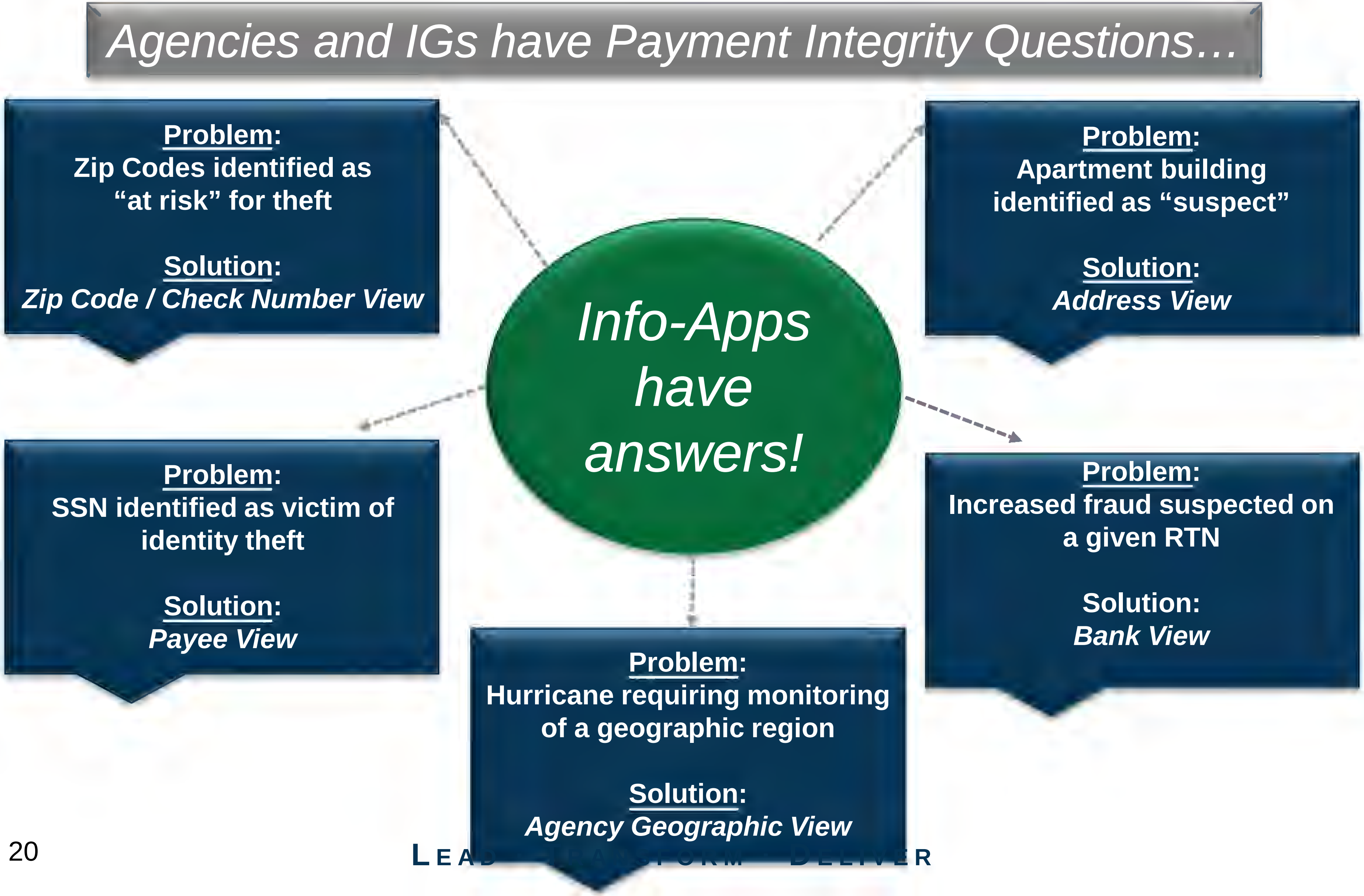
Evaluate results and effectiveness of process improvements

5 **IMPROVE**

Share best practices with stakeholders through training and outreach



Payment Integrity Info-Apps In Action



Agencies and IGs have Payment Integrity Questions…

Info-Apps have answers!

Problem:
Zip Codes identified as "at risk" for theft

Solution:
Zip Code / Check Number View

Problem:
Apartment building identified as "suspect"

Solution:
Address View

Problem:
SSN identified as victim of identity theft

Solution:
Payee View

Problem:
Increased fraud suspected on a given RTN

Solution:
Bank View

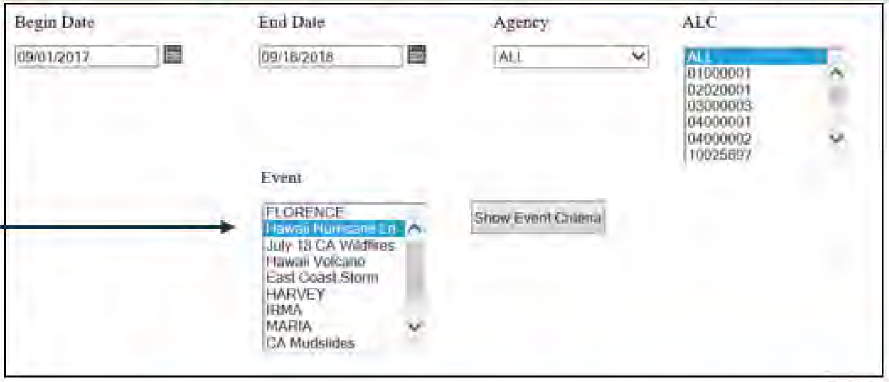
Problem:
Hurricane requiring monitoring of a geographic region

Solution:
Agency Geographic View

Payment Integrity Info-Apps in Action

Monitor Payees Impacted by Natural Disasters

Users supply parameters such as date range, agency, and event to monitor



Begin Date	09/01/2017
End Date	09/18/2018
Agency	ALL

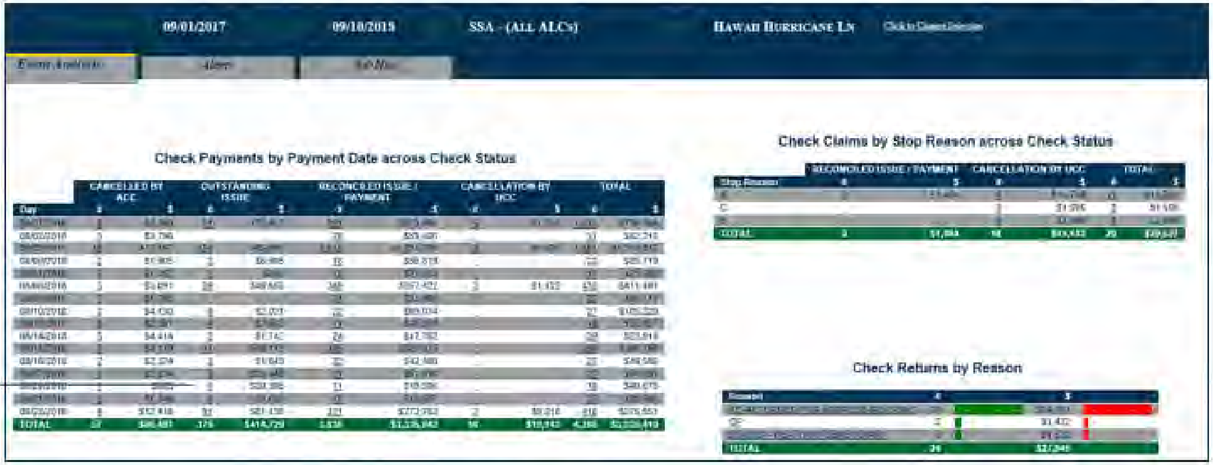
ALC:
ALL
01000001
02020001
03000003
04000001
04000002
10025897

Event:
FLORENCE
Hawaii Hurricane Ln
July 18 CA Wildfires
Hawaii Volcano
East Coast Storm
HARVEY
IRMA
MARIA
CA Mudslides

Info-App provides post payment monitoring and alerts for disaster event

Alerts identify payment integrity risks (e.g. Many payees at one address, possible forgeries)

User can drill down for a list of payees with uncashed or returned checks



09/01/2017 09/18/2018 SSA - (ALL ALCs) HAWAII HURRICANE LN

Check Payments by Payment Date across Check Status

	CANCELLED BY ACC		OUTSTANDING ISSUE		RECONCILED ISSUE / PAYMENT		CANCELLATION BY UCC		TOTAL	
Day	#	$	#	$	#	$	#	$	#	$
[illegible]	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	3	[illegible]	[illegible]	[illegible]
08/02/2018	3	$3,796			[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	3	[illegible]	[illegible]	[illegible]
08/07/2018	2	$1,905	3	$6,895	18	$58,319			23	$65,119
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
08/08/2018	3	$5,491	28	$48,605	348	$357,422	3	$1,432	432	$411,481
[illegible]	[illegible]	[illegible]			[illegible]	[illegible]			[illegible]	[illegible]
08/10/2018	3	$4,030	8	$2,093	76	$99,034			87	$105,228
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
08/14/2018	3	$4,414	3	$1,740	24	$17,782			29	$23,818
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
08/16/2018	2	$2,374	1	$1,645	30	$42,500			33	$46,500
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	1	[illegible]	8	$20,395	11	$19,236			18	$40,075
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
08/22/2018	8	$12,418	92	$81,430	331	$272,782	2	$8,218	418	$376,553
TOTAL	57	$46,481	175	$414,729	1,038	$1,226,842	[illegible]	$10,942	[illegible]	[illegible]

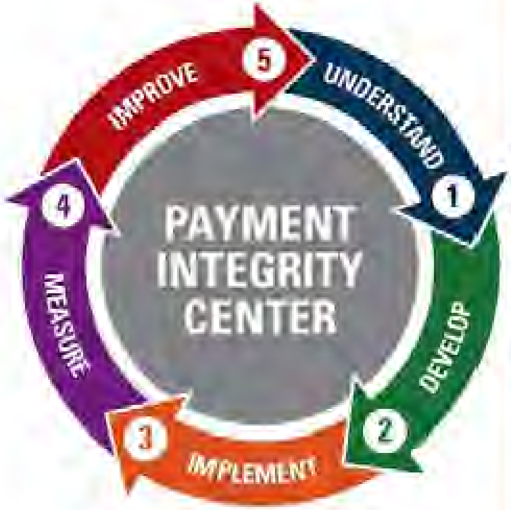
Check Claims by Stop Reason across Check Status

	RECONCILED ISSUE / PAYMENT		CANCELLATION BY UCC		TOTAL	
Stop Reason	#	$	#	$	#	$
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
C			1	$1,595	1	$1,595
[illegible]			[illegible]	[illegible]	[illegible]	[illegible]
TOTAL	3	$1,084	[illegible]	[illegible]	20	[illegible]

Check Returns by Reason

Reason	#	$
[illegible]	[illegible]	[illegible]
[illegible]	2	$1,432
[illegible]	[illegible]	[illegible]
TOTAL	26	$27,949

High Dollar Payments to High Fraud Risk Financial Institutions



Apply repeatable process and utilize core competencies

Problem	Agency discovered fraudulent large dollar payments disbursed to pre-paid debit cards: • Payees may be unaware of identity theft and payments made on their behalf • Payments may be misdirected or unauthorized / non-entitled • Agencies may be unaware of high-risk RTN with high percentage of fraud
Solution	Info-App monitors high dollar payments to Financial Institutions with high risk of fraud: • List of FIs maintained through network of agencies and law enforcement • Identified payments over $5K to high-risk FIs • Identified fraud indicators (return reasons, non-receipts claims, fraudulent enrollments) • Conducted payee profile analysis (Have other agencies paid this person to the same FI?)
Results	Provided cross governmental payee profile risk analysis: • Conducted pilot with several agencies to test cross-government data sharing • Analyzed fraud trends (RTN, geographic area, payment types) • Worked with agency stakeholders and IGs to identify, recover, and investigate

Common Challenges

How can we partner to solve Payment Integrity issues?

Seven Topics of Common Interest
Payments to the Deceased
Inter-Agency Benefit Eligibility
Payee Validation (Banking Info, Address)
High Risk Financial Institutions
Compromised Payees and Accounts
Payee Characteristics (DOB, DOD, Incarcerated, etc.)
Updates to 31 CFR Part 210

Deceased Payee Analysis

Step 1 – Understand the Business Problem

How big is the problem?
Identify payments made after date of death

Who is paying them?
Identify agencies and payment types

Evaluate eligibility rules
Determine if payments to deceased individuals were appropriate

Compile data sources
Utilize multiple sources of deceased payee data

Data Quality Analysis
Evaluate payees and dates of death to ensure consistent info

Recovery Efforts
Determine if funds were recovered from post payment events

What's Next?

Agency Partnership Engagement

Quarterly Meetings
Review cross government initiatives
Solicit agency requirements
Share best practices

OMB Workgroups

Participate in CAP Goal 9 Workgroups

- *Strategic Data Use*
- *Monetary Loss – Root Causes*

Provide subject matter expertise

Implement Customer Solutions

Initiate Customer Driven Projects
Apply repeatable Payment Integrity Solution Lifecycle
Utilize core competencies to execute solutions
Demonstrate tangible value through prevention and recovery

Homeland
Security

DHS Anti-Fraud Effort

Partnering to Prevent
and
Address USG Fraud

Overview

- Established a DHS OIG Anti-Fraud Plan
- Launch of Specialized Units
- Strategic Efforts:
  - *Create a Culture of Anti-Fraud Measures*
  - *Work with DHS to Identify and Assess fraud risks*
  - *Implement internal and external mechanisms for Preventing and Detecting fraud*
  - *Insight into Actions: indictments, convictions, recoveries and future prevention*
- Questions

Anti-Fraud Plan

Mission:

- Proactively identify, investigate and prosecute fraud schemes and corrupt activities that pose significant risk and major financial impact to DHS;
- Develop expertise in every field office and provide highly specialized tools and other support to the field, enabling INV to conduct high impact fraud and corruption cases around the country.

Strategic Efforts - Culture

- Establish and maintain a multi-disciplinary team of fraud experts:
  - Special Agents well-versed in conducting complex fraud investigations
  - Forensic Auditors/Forensic Accountants
  - Intel Analysts
  - Data Scientists
  - Digital Forensic Analysts
  - Program Analysts
  - Admin Support Staff

Strategic Efforts – Identify & Assess

- Collaborate with OIG Audits to help identify high-impact fraud and contract corruption (sensitizes OA to fraud schemes)
- Collaborate with OIG & law enforcement community to identify latest schemes
- Review DHS OIG Hotline with “Big Fraud Perspective”
- Attend fraud conference/forums to identify latest schemes
- Meet with DHS stakeholders to identify vulnerabilities
- Identify data sources that can be mined

Strategic Efforts – Prevent & Detect

- Implement a strong fraud awareness effort throughout DHS
- Partner with DHS Office of Chief Procurement Officer and Heads of Contracting Activities
- Establish a close partnership with DHS Suspension and Debarment Officials
- Develop Fraud Working Groups within DHS
- Use analytics to proactively detect significant frauds and corruption

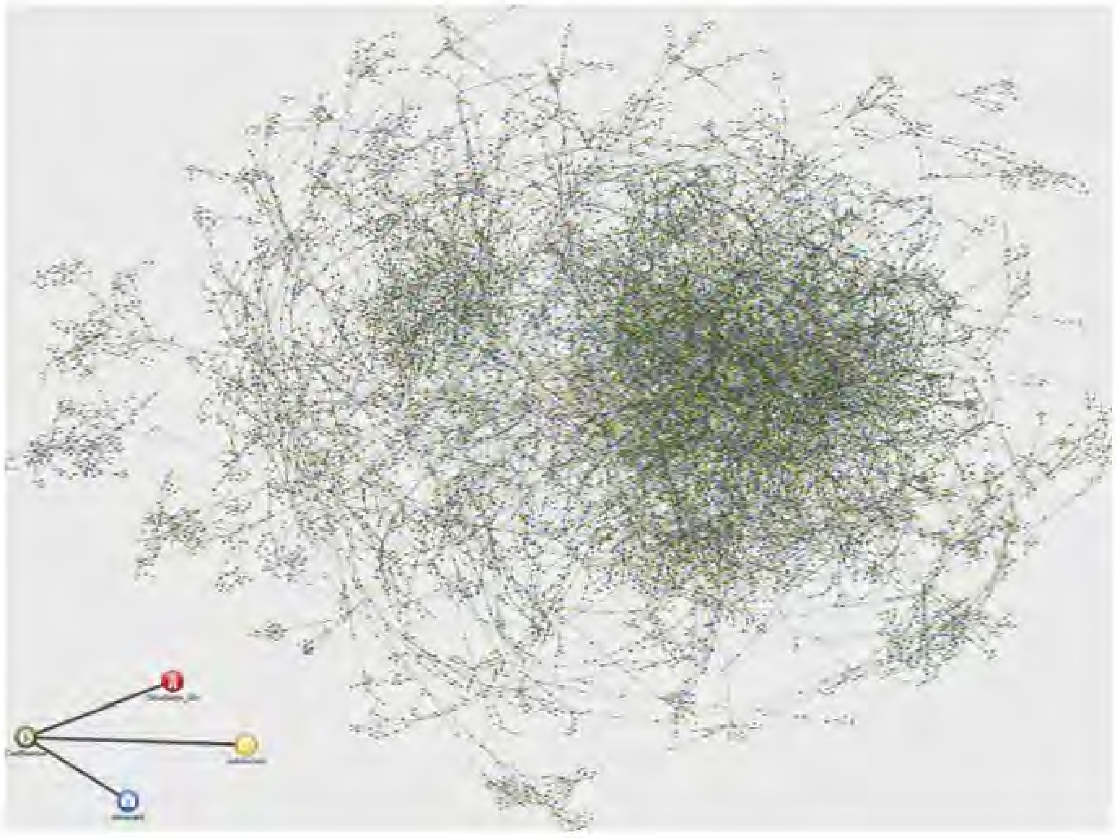
Strategic Efforts – Insight into Action

- Strategically target, build and conduct major fraud and corruption investigations
  - Work with law enforcement counterparts and DoJ to facilitate investigations and prosecutions
  - Use specialized fraud expertise to enable DHS OIG field offices throughout the U.S.
  - Utilize DHS Component investigative organizations to support fraud investigations

Case Study

Fusion Team Makeup – $100M benefits fraud

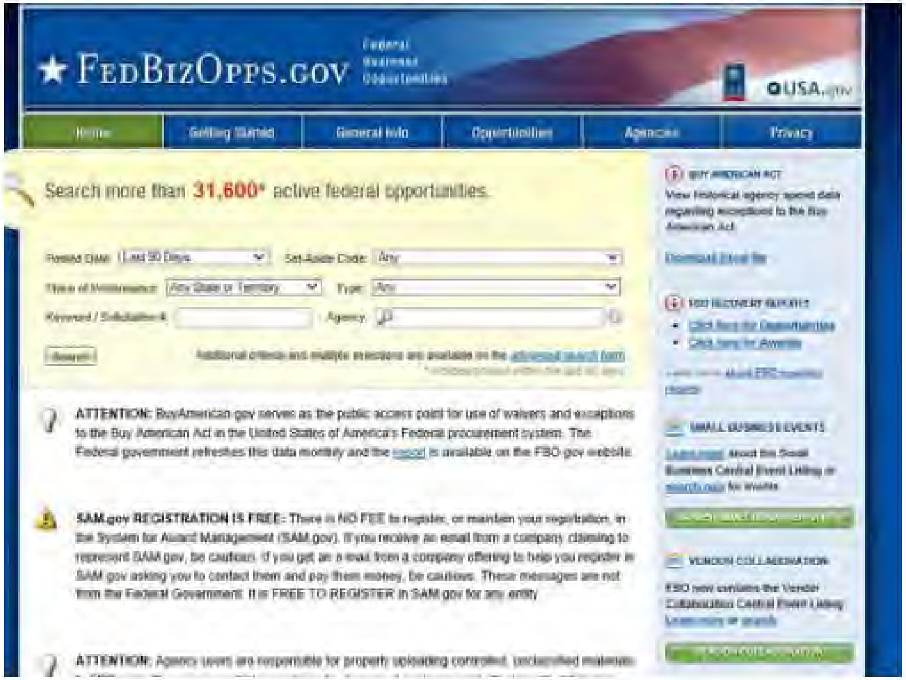
- Senior Special Agent
  - Data Scientist (1)
  - Digital Forensics Analyst (1)
  - Intelligence Analyst (2)
  - Forensic Accountant (2)
  - Field Agents (multiple)



Case Study

Contractor Impersonation

- Fraudsters obtain legitimate solicitations
- Fax/Phone/Email and delivery address are replaced
- Sent to contractors
- Fraudsters “accept” and take delivery of products



Search more than 31,600* active federal opportunities.

Posted Date: Last 90 Days

Set-Aside Code: Any

Place of Performance: Any State or Territory

Type: Any

Keyword / Solicitation #:

Agency:

Additional criteria and multiple selections are available on the advanced search form

ATTENTION: BuyAmerican.gov serves as the public access point for use of waivers and exceptions to the Buy American Act in the United States of America's Federal procurement system. The Federal government refreshes this data monthly and the report is available on the FBO.gov website.

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ATTENTION: Agency users are responsible for properly uploading controlled, unclassified materials

BUY AMERICAN ACT

View historical agency spend data regarding exceptions to the Buy American Act

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SMALL BUSINESS EVENTS

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VENDOR COLLABORATION

FBO now contains the Vendor Collaboration Central Event Listing. Learn more or search.

Questions and Discussion

"There is no kind of dishonesty into which otherwise good people more easily fall than that of defrauding the government."

- Benjamin Franklin

Contact Information

Office of Management And Budget
Dan Kaneshiro

Bureau of the Fiscal Service
Tammie Johnson
Management and Program Analyst
tammie.johnson@fiscal.treasury.gov
paymentintegrity@fiscal.treasury.gov
304-480-7139

James Long