

Lane County Human Services Division Rent Assistance Program Fraud Policy

Effective May 1, 2021

Purpose.

It is the intent of Lane County to impartially investigate any suspected acts of fraud as defined in this policy. Any act of fraud that is detected or suspected must be reported immediately and investigated in accordance with procedures laid out herein. Lane County will make every reasonable effort, including court ordered restitution, to recover and receive compensation from any appropriate source for program assets obtained by fraud. Fraud is also a reason for denial of services under the Lane County Rent Assistance Program Denial and Grievance Policy.

Policy.

Fraud is any action taken by a tenant, landlord, property manager, owner, or any service provider that knowingly and in bad faith:

- Submits an application with fraudulent information or documentation.
- Overcharges for a cost or service.
- Misrepresents the amount of rent, or housing services due.
- An assistance request for an expense that is known to be ineligible
- Submits an application for assistance that is not owed.
- Submits an application for assistance that has been paid.
- Fails to report rent, costs, or services that have been paid with program funds.
- Fails to repay assistance for costs or services reimbursed from other sources; and/or
- Other fraudulent behavior not listed, this list is not meant to be exhaustive.

In all phases of the Lane County Rent Relief Program, attempts will be made to reduce the possibility of fraud including but no limited to:

- Notifying a tenant, landlord, property manager, owner, or any service provider of the fraud policy and consequences of fraud.
- Requiring all subcontractors to have policies addressing fraud.
- Having guidance as to when self-attestation is an allowable means of determining eligibility.
- Reconciling amounts owed through declaration of both the tenant and the landlord, property manager, or owner.
- Requiring both the tenant and landlord to attest there is no duplication of benefits or applications for benefits; and
- Separation of financial requisition and check writing roles.

Any fraud or suspected fraud must be reported to Lane County. A report can be made either verbally or in writing, if one has reason to believe that a principal, employee, agent, subcontractor, vendor, program applicant and/or program participant may have committed fraud, misrepresentation, falsifying data system input, made a false claim or committed a prohibited act under the Oregon False Claims Act, has committed an ethical violation, has committed criminal or civil violation of laws

pertaining to bribery, gratuity, conflict of interest or has committed other acts of misrepresentation or conspiracy to engage in misrepresentation in connection with Lane County's Rent Assistance Programs.

Reports of fraud may be made through one of the following mechanisms:

- **Rent Assistance Program Services Coordinator 541-682-3776**
- **Lane County Fraud, Waste, and Abuse Toll-Free Telephone Hotline**
 - English Speaking 844-290-0008
 - Spanish Speaking 800-216-1288
- **Lane County Fraud, Waste, and Abuse Website**
 - www.lighthouse-services.com/lanecounty
- **Lane County Fraud, Waste, and Abuse Email**
 - reports@lighthouse-services.com
- **Lisa Nichols, Quality & Compliance Manager**
 - Lisa.Nichols@lanecountyor.gov
- **The Treasury Office of Inspector General hotline**
 - 1-800-359-3898

An individual filing a complaint may request the complaint to be handled confidentially if they believe disclosing their identity may create a hardship or place them in danger. If confidentiality is elected, it is suggested but not required to provide as much contact information as they are comfortable if additional details are needed. Filing an anonymous complaint may limit the ability to conduct a thorough investigation.

If program fraud is reported to the Lane County Rent Assistance Program Coordinator they request the name and phone number from the caller. They do not confirm or deny that the person being accused of fraudulent behavior is or isn't an applicant and lets the caller know that if any action is taken, the caller will not be notified or updated on the action or the outcome.

Then, the Rent Assistance Program Coordinator contacts the agency that did the intake and gathers all related information and input. The Rent Assistance Program Coordinator reviews the application, supporting materials and information in the database, then contacts the applicant by phone. If the question of fraud remains after this contact with the applicant, the Rent Assistance Program Coordinator writes a letter to the applicant with an information request related to the situation. At this point the Rent Assistance Program Coordinator notifies Oregon Housing and Community Services (OHCS). The letter to the applicant is mailed and has a deadline and details the consequences that will occur if the deadline is not met and/or the necessary documentation is not provided. If deadline is not met, or the necessary documentation is not provided, the Rent Assistance Program Coordinator follows through on the consequences outlined in the letter. This includes a follow up letter to the applicant with the final outcome. The Rent Assistance Program Coordinator maintains all correspondence and notes related to the fraud situation.

If fraud is reported to the Lane County Fraud, Waste or Abuse hotline, Lane County procedures are followed as spelled out in the Lane County Administrative Program Manual, Chapter 2, Section 26.