

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Inspector General**

**Inspector General**



September 8, 2021

Wayne Turnage  
Deputy Mayor for Health and Human Services  
Director  
Department of Health Care Finance  
441 4<sup>th</sup> Street, Suite 900S  
Washington, D.C. 20001

Barbara J. Bazron, PhD  
Director  
Department of Behavioral Health  
64 New York Avenue, N.E., 3<sup>rd</sup> Floor  
Washington, D.C. 20002

Dear Deputy Mayor Turnage and Dr. Bazron:

The Office of the Inspector General (OIG) Inspections and Evaluations Unit (I&E) will soon start an inspection of the Department of Health Care Finance's (DHCF) and Department of Behavioral Health's (DBH) processes for paying behavioral health and substance use disorder (BH/SUD) treatment service providers.

The objectives of this inspection are to identify: (1) the funding sources and payment processes employed by DHCF and DBH to provide BH/SUD treatment services; (2) DHCF's and DBH's respective authorities and responsibilities for preventing, detecting, and addressing improper payments; and (3) any weakness in DHCF's and DBH's administration and oversight of payment processes that might increase the District's susceptibility to fraud, waste, or abuse. The scope of this engagement will cover Fiscal Years 2020 and 2021.

We will conduct this inspection in accordance with standards established by the Council of the Inspectors General on Integrity and Efficiency, paying particular attention to the quality of internal control.<sup>1</sup>

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<sup>1</sup> "Internal control" is defined by the U.S. Government Accountability Office (GAO) as comprising "the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity" and is "not one event, but a series of actions that occur throughout an entity's operations." Furthermore, internal control is a process that provides "reasonable assurance that the objectives of an entity will be achieved," "serves as the first line of defense in safeguarding assets," and is an "integral part of the operational processes management uses to guide its operations.: U.S. GOV'T ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT 5-6, GAO-I 4-704G (Sept. 2014).


Please provide Edward Farley, Assistant Inspector General for Inspections and Evaluations, with the name and telephone number of the person who will serve as the primary point of contact at your respective agency during the inspection. You can reach Mr. Farley at 202-727-9249 or [edward.farley@dc.gov](mailto:edward.farley@dc.gov).

In addition, Mr. Farley will need the following information no later than September 15, 2021, so the I&E team can prepare its project plan:

- All memoranda of understanding and memoranda of agreement between DHCF and DBH that pertain to payments for BH/SUD treatment services;
- DBH's current contract with Conduent (CW61706) and all modifications to it;
- A list of all computer systems/software used to administer or monitor payment processes (e.g., the Integrated Care Applications Management System, the District Automated Treatment Accounting System Web Infrastructure Technology System, WINASAP, ProviderConnect) to include the name of each system, a brief description of each system's purpose/use, and the name/contact information for each system's lead administrator;
- Any billing manuals or other job aids used at DHCF or DBH to guide employees with processing claims and payments for BH/SUD treatment services;
- Any process flow charts that detail the claims and payment processes; and
- Any audits or other assessments (conducted by DHCF, DBH, or an external entity) of DHCF and/or DBH payment processes received during the last 3 fiscal years.

Thank you in advance for your cooperation, and I look forward to working with your agencies in our joint efforts to improve the quality of services provided to the District.

Sincerely,

  
Daniel W. Lucas  
Inspector General

DWL/ef

cc: See Distribution List:

**Distribution List (via email):**

The Honorable Muriel Bowser, Mayor, District of Columbia, Attn: Betsy Cavendish  
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The Honorable Kathy Patterson, D.C. Auditor, Office of the D.C. Auditor