



# Minnesota DHS/MNIT

Pre-payment solution roadmap and Rapid Response Team to improve detection of Fraud, Waste and Abuse in DHS health care programs

## Addendum to Program Integrity Vulnerability Assessment

February 5, 2026

This report contains not public data as classified by the Minnesota Government Data Practices Act, including security information, trade secret information, and auditing data. For ease of reference and protection, not public information is highlighted throughout the document. Improper disclosure of such information could jeopardize the State's ability to safeguard tax payer funds from fraudulent actors.

# Addendum To Program Integrity Vulnerability Assessment

## Supplemental Information

### Minnesota DHS/MNIT

Original Report Date: January 31, 2026

Addendum Date: February 5, 2026

### **Purpose of this Addendum**

This addendum provides supplemental information for Table 5, (titled Policy Refinements – Potential savings achievable by revising and clarifying policy language to reduce ambiguity and improve compliance) in the *Minnesota DHS/MNIT Program Integrity Vulnerability Assessment* (Vulnerability Assessment) dated January 31, 2026.

Table 5 includes a note: “Counts may be duplicated”. There was a request to provide additional information on the analytic counts that may include duplicate claims, as noted in the report. To improve clarity and transparency for stakeholders, this addendum introduces two supplemental tables that provide additional detail on how analytic counts and dollar amounts are represented.

This additional information is provided to enhance interpretability of the data and does not alter the methodology or recommendations of the original report.

### **Table 5 Supplemental Information**

Table 5 in the Vulnerability Assessment summarizes potential savings achievable through policy refinement, based on analytics applied to 46 months of paid fee-for-service claims data.

As noted in the report:

*“Data used in this report reflects DHS supplied criteria. Counts may be duplicated.”*

This duplication occurs because:

- Individual claims may trigger multiple analytic scenarios, and
- Analytics are designed to capture different dimensions of policy ambiguity or vulnerability, not to produce a one-to-one claim count.

## **Addendum To Program Integrity Vulnerability Assessment**

This approach is standard in vulnerability and policy-gap assessments and is intended to highlight areas of exposure, not to represent unique claim volumes or determinations of fraud, waste or abuse.

### **New Supplemental Tables Provided**

To further clarify how analytic counts and dollar values should be interpreted, this addendum introduces the following supplemental tables in addition to Table 5:

#### **Table 5.1 – Detailed Analytic Results** (see Attachment 1 below)

- Provides a more granular view of the analytics contributing to Table 5
- Includes individual analytic scenarios, associated claim lines, and dollar amounts
- Reflects duplicate claims across multiple analytics, which is expected and appropriate for vulnerability identification
- Intended to show the breadth and depth of policy exposure, not to estimate recoverable dollars

Purpose:

To transparently illustrate how multiple analytics can apply to the same claim when policies are ambiguous or overlapping.

#### **Table 5.2 – De-Duplicated Dollar Impact** (see Attachment 2 below)

- Aggregates unique claims across the analytics per program in Table 5
- De-duplicates the “\$ paid” field so each claim is counted once in “\$ paid” column
- Provides a de-duplicated view of potential dollar exposure, based on unique paid claims only
- Duplication occurs because individual claims may trigger multiple analytic scenarios. Analytics are designed to capture different dimensions of policy ambiguity or vulnerability, not to produce a one-to-one claim count. This approach is standard in vulnerability and policy-gap assessments and is intended to highlight areas of exposure, not to represent unique claim volumes or determinations of fraud, waste or abuse.

## **Addendum To Program Integrity Vulnerability Assessment**

### **Purpose:**

To support clearer financial interpretation while maintaining consistency with the original findings.

### **Impact to Findings and Conclusions**

This addendum:

- Does not change any vulnerability findings
- Does not change recommendations for policy refinement, claims adjudication, or pre-payment controls
- Does not reclassify any findings as fraud, waste, or abuse

The Vulnerability Assessment remains a point-in-time, analytic evaluation intended to inform DHS prioritization, policy clarification, and system improvements.

This addendum provides additional transparency into the representation of analytic counts and dollar amounts in Table 5 by distinguishing between analytic-level results and de-duplicated claim-level dollar exposure. This supplemental information strengthens the interpretability of the data.

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Minn. Stat. 13.37 (Security/Trade Secret Information)

### Attachment 1 - Table 5.1 – Detailed Analytic Results

Claim totals are unique to each individual analytic; however, a single claim may appear in multiple analytics. Because of this, adding the totals together may cause duplication.

Priority	Analytic #	Concern/Allegation	Pay to Provider Count	Claim Line Count	Line \$ Paid	
<b>Housing Stabilization Services (HSS)</b>						
1	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -	
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	74	128	\$ 17,529.45	
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -	
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -	
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	[REDACTED]	-	-	\$ -
	<b>Analytics = 6</b>	<b>HSS Totals</b>	<b>74</b>	<b>128</b>	<b>\$ 17,529.45</b>	
<b>Peer Recovery Support Services (PRSS)</b>						
2	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -	
	<b>Analytic = 1</b>	<b>PRSS Totals</b>	<b>-</b>	<b>-</b>	<b>\$ -</b>	
<b>Early Intensive Developmental and Behavioral Intervention (EIDBI)</b>						
3	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	2	18	\$ 3,885.72	
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	346	4,545,516	\$ 629,770,032.47	
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	313	2,449,956	\$ 355,585,337.24
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	2	159	\$ -
	[REDACTED]	[REDACTED]	[REDACTED]	-	-	\$ -

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**Minn. Stat. 13.37 (Security/Trade Secret Information)**

Priority	Analytic #	Concern/Allegation	Pay to Provider Count	Claim Line Count	Line \$ Paid
3	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	79	108,756	\$ 1,814,335.97
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	159	751,603	\$ 64,593,077.67
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	<b>Analytics = 10</b>	<b>EIDBI Totals</b>	<b>901</b>	<b>7,856,008</b>	<b>\$ 1,051,766,669.07</b>
4	<b>Integrated Community Supports (ICS)</b> No applicable Analytics		-	-	\$ -
<b>Non-Emergency Medical Transportation (NEMT)</b>					
5	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	93	54,897	\$ 12,443,836.50
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	106	98,256	\$ 3,350,502.95
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Info) [REDACTED]	-	-	\$ -
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	103	30,973	\$ 1,580,152.18
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	1	367	\$ 9,693.61
	<b>Analytics = 5</b>	<b>NEMT Totals</b>	<b>303</b>	<b>184,493</b>	<b>\$ 17,384,185.24</b>
<b>Adult Rehabilitative Mental Health Services (ARMHS)</b>					
6	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	47	1,618	\$ 157,622.81
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	17	598	\$ 84,522.85
	Minn. Stat. 13.37 (Security/Trade Secret Information)	[REDACTED]	-	-	\$ -
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]	-	-	\$ -

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**Minn. Stat. 13.37 (Security/Trade Secret Information)**

Priority	Analytic #	Concern/Allegation	Pay to Provider Count	Claim Line Count	Line \$ Paid
6	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]r	-	-	\$ -
	[REDACTED]	[REDACTED]	147	12,645	\$ 3,076,783.17
	[REDACTED]	[REDACTED]	176	45,936	\$ 7,204,764.84
	<b>Analytics = 8</b>	<b>ARMHS Totals</b>	<b>387</b>	<b>60,797</b>	<b>\$ 10,523,693.67</b>
<b>Personal Care Assistance/ Community First Services and Supports (PCA/CFSS)</b>					
7	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	1	2	\$ 1,298.99
	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	1	6,037	\$ 603,700.00
	[REDACTED]	[REDACTED]	23	136	\$ 152,272.36
	[REDACTED]	[REDACTED]	3	18	\$ 3,814.54
	[REDACTED]	[REDACTED]	-	-	\$ -
	<b>Analytics = 9</b>	<b>PCA/CFSS Totals</b>	<b>28</b>	<b>6,193</b>	<b>\$ 761,085.89</b>
<b>Adult Day Services (ADS)</b>					
8	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	-	-	\$ -
	<b>Analytics = 3</b>	<b>ADS Totals</b>	<b>-</b>	<b>-</b>	<b>\$ -</b>

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**Minn. Stat. 13.37 (Security/Trade Secret Information)**

Priority	Analytic #	Concern/Allegation	Pay to Provider Count	Claim Line Count	Line \$ Paid
<b>Recuperative Care (RC)</b>					
9	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	4	7	\$ 5,668.11
	<b>Analytics = 2</b>	<b>RC Totals</b>	<b>4</b>	<b>7</b>	<b>\$ 5,668.11</b>
<b>Individualized Home Supports (IHS)</b>					
10	[REDACTED]	[REDACTED]	112	18,590	\$ 1,374,245.71
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]	1,200	1,872,246	\$ 428,260,487.02
	<b>Analytics = 2</b>	<b>IHS Totals</b>	<b>1,312</b>	<b>1,890,836</b>	<b>\$ 429,634,732.73</b>
<b>Adult Companion Care (ACC)</b>					
11	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	-	-	\$ -
	[REDACTED]	[REDACTED]	7	169	\$ 6,249.54
	[REDACTED]	Minn. Stat. 13.37 (Security/Trade Secret Information) [REDACTED]	3	721	\$ 39,087.60
	[REDACTED]	[REDACTED]	5	13	\$ 2,893.14
	<b>Analytics = 5</b>	<b>ACC Totals</b>	<b>15</b>	<b>903</b>	<b>\$ 48,230.28</b>
<b>Night Supervision (NS)</b>					
12	[REDACTED]	[REDACTED]	121	28,811	\$ 7,301,811.84
	[REDACTED]	[REDACTED]	98	807	\$ 217,227.92
	[REDACTED]	[REDACTED]	712	632,866	\$ 176,008,740.29
	[REDACTED]	[REDACTED]	444	35,330	\$ 12,708,918.34
	<b>Analytics = 4</b>	<b>NS Totals</b>	<b>1,375</b>	<b>697,814</b>	<b>\$ 196,236,698.39**</b>

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**Minn. Stat. 13.37 (Security/Trade Secret Information)**

Priority	Analytic #	Concern/Allegation	Pay to Provider Count	Claim Line Count	Line \$ Paid
<b>Assertive Community Treatment (ACT)</b>					
13	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<b>Analytics = 2</b>	<b>ACT Totals</b>	-	-	\$ -
<b>Intensive Residential Treatment Service (IRTS)</b>					
14	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	72	81,409	\$ 42,405,467.71
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	41	110	\$ 34,906.88
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	44	164	\$ 52,901.69
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	10	259	\$ 87,797.39
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	86	188	\$ 68,088.39
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	22	52	\$ 15,626.94
	<small>Minn. Stat. 13.37 (Security/Trade Secret Information)</small>	[REDACTED]	-	-	\$ -
	<b>Analytics = 10</b>	<b>IRTS Totals</b>	<b>275</b>	<b>82,182</b>	<b>\$ 42,664,789.00</b>
		<b>Grand Total</b>	<b>4,674</b>	<b>10,779,361</b>	<b>\$ 1,749,043,281.83**</b>

\*\* - Difference of \$9 from Table 5 in the Vulnerability Assessment due to transposed numbers

## Addendum To Program Integrity Vulnerability Assessment

**Attachment 2 - Table 5.2 – De-Duplicated Dollar Impact**

Priority	High-Risk Services	Provider Count	Claim Line Count	\$ Paid
1	Housing Stabilization Services (HSS)	74	128	\$ 17,529.45
2	Peer Recovery Support Services (PRSS)	-	-	\$ -
3	Early Intensive Developmental and Behavioral Intervention (EIDBI)	346	5,466,937	\$ 703,149,454.75
4	Integrated Community Supports (ICS)	-	-	\$ -
5	Non-Emergency Medical Transportation (NEMT)	127	171,577	\$ 14,857,565.42
6	Adult Rehabilitative Mental Health Services (ARMHS)	228	60,205	\$ 10,433,655.35
7	Personal Care Assistance/ Community First Services and Supports (PCA/CFSS)	96	32,196	\$ 3,047,270.91
8	Adult Day Services (ADS)	-	-	\$ -
9	Recuperative Care (RC)	12	795	\$ 383,012.77
10	Individualized Home Supports (IHS)	547	230,812	\$ 64,260,837.90
11	Adult Companion Care (ACC)	14	903	\$ 48,230.28
12	Night Supervision (NS)	793	695,043	\$ 195,175,722.45
13	Assertive Community Treatment (ACT)	-	-	\$ -
14	Intensive Residential Treatment Service (IRTS)	153	81,986	\$ 42,554,376.67
<b>Total</b>		<b>2,390</b>	<b>6,740,582</b>	<b>\$ 1,033,927,655.95</b>