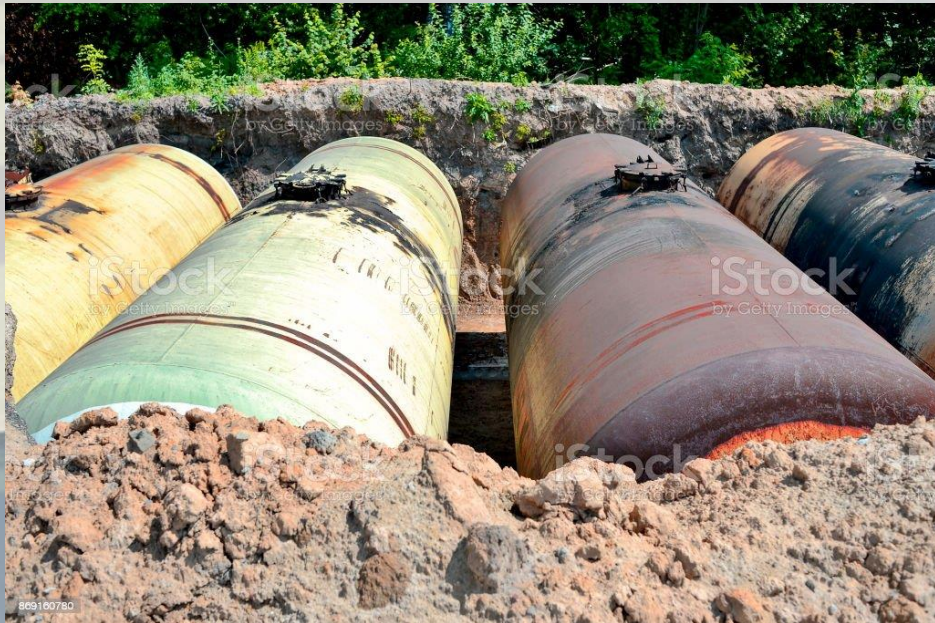


Expedited Claim Account Program (ECAP) – A Proactive Approach to Preventing Fraud, Waste, and Abuse



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Why Was ECAP Created?



- Inconsistencies in interpretation of Low-Threat Underground Storage Tank Case Closure Policy (Policy)
- Cleanup funds spent on unnecessary tasks or remediation methods
- Claimants spent more than maximum claim reimbursement before site closure
- Claimants performed work directed by regulatory agencies that was denied reimbursement by Cleanup Fund (Fund)

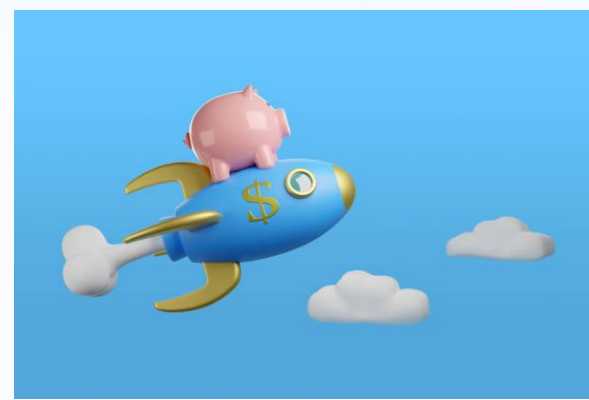


ECAP Objectives

- Reduce cost for site cleanup and time to reach closure
- Establish multi-year budgets
- Increase collaboration between Fund, regulator, claimant and consultant;
and
- Create project milestones, cost estimates, and reimbursement submission schedules



ECAP Benefits



- ECAP staff conducts the initial Conceptual Site Model (CSM) meeting with agency to establish closure criteria
- ECAP staff review Project Execution Plan (PEP) to establish scope and budget for tasks needed for path to closure
- Data objectives, milestones, and general approach to achieve closure are determined prior to field work

ECAP Benefits (Cont.)

- Expectations regarding scope of work, schedule, costs, and anticipated reimbursements are clearly defined prior to implementation of tasks
- ECAP staff facilitate periodic conference call meetings with stakeholders, agencies, claimants, and consultants known as JET meetings



Project Execution Plan (PEP)

- Includes a list of approved tasks based on a Path to Closure Plan
- Estimated completion dates and budgets are developed for each task
- Budgets for each task are based on the Fund Cost Guidelines (Cost Guidelines)



Fraud Prevention



- Corrective actions are agreed upon by the JET team prior work being started
- Agreed upon corrective actions are documented in writing, provided to the JET, and stored in the claim file
- Site-specific conditions that may require unusual equipment or expertise are discussed and, if needed, the PEP budget is adjusted based on provided justifications



Fraud Prevention (Cont.)

- Active remediation system designs are reviewed by Fund staff prior to installation
- Active remediation system start-up data are closely monitored by Fund staff





Waste Prevention

- Corrective action based on the current or planned /permitted future site use
- Active remediation systems are closely monitored by Fund staff to assess the need for system optimizations

Waste Prevention(Cont.)

- Active remediation systems that have reached their clean up capability limits are optimized by making system modifications or are recommended for shut-down
- Remedial actions are based on Policy



Abuse Prevention

- Reimbursement requests/invoices are compared with pre-defined tasks and associated cost estimates in the PEP prior to payment
- Reimbursement requests for costs that are inconsistent with the Policy or Cost Guidelines are determined to be ineligible for reimbursement



**NO
DEAL**



Abuse Prevention - Examples

- Limiting interim remedial actions (clean-ups performed before an initial CSM is developed)
- Requesting the shut-down of an active remediation system that has reached its maximum cleanup capability limit
- Limiting remedial excavation of soil to areas that have been delineated as exceeding Policy criteria



Abuse Prevention – Examples(Cont.)



- Working closely with the lead agencies and consultants to develop and document a Path to Closure Plan
- Working closely with claimants and their consultants to ensure their roles and expectations are clearly defined



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Contact us to:

- Ask question about ECAP
- Schedule an ECAP presentation

