



60 Minutes that Never Happened A Psychotherapy Fraud Case Study

U.S. v Courtney Dunlap

Joint investigation by the FBI & HHS-OIG



Ruse Call to Cortney Dunlap

(Play first 20 sec only)





Objectives



- Proactive Data mining during COVID-19 Shutdown
- Initial Investigation
- Unanswered questions
- Search Warrant & Additional Investigation
- Arrest & Prosecution



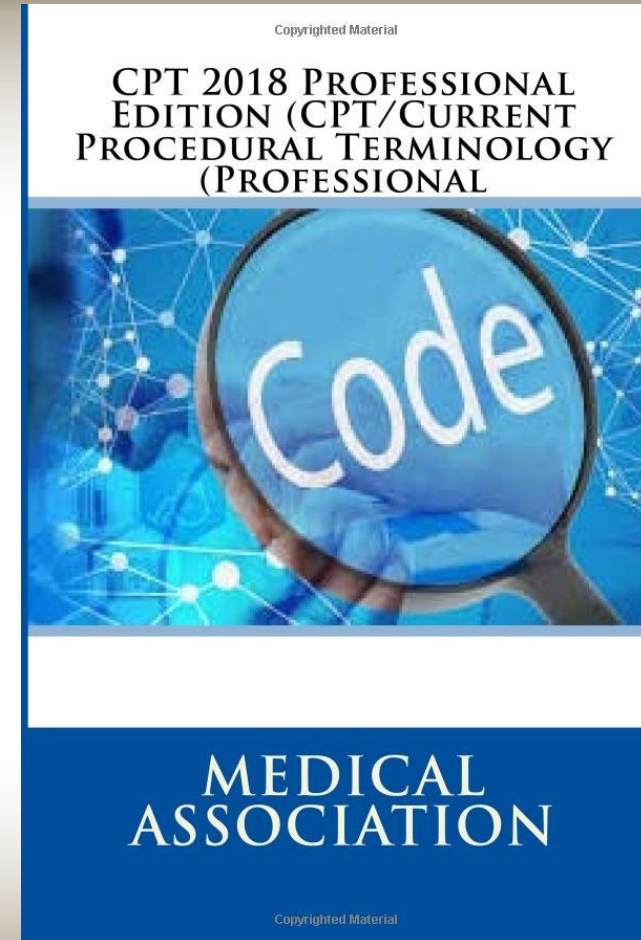
Proactive Data Mining 90837



90837 CPT for Behavioral Health

"Psychotherapy, 60 minutes with patient and/or family member"

Proactive Search of Medicaid
Providers who billed 90837 from
January 1, 2020 to March 25, 2020





Proactive Data Mining 90837



Top Paid Behavioral Health Providers in CT for 90837 from January 1, 2020 to March 25, 2020

count	Billing Prov Name	Billing Prov Specialty iC Description	Procedure Code	Recipient Count	Paid Amount
1	VILLAGE FOR FAMILIES & CHILDREN INC	526 - Enhanced Care Clinic (ECC)	90837	952	\$316,490.74
2	LIFEBRIDGECOMMUNITY SERVICES, INC.	525 - Mental Health Clinic	90837	622	\$170,683.13
3	KATO COUNSELING, LLC	121 - Professional Counselor	90837	87	\$156,518.02
4	STOKES COUNSELING SERVICES LLC	115 - Licensed Clinical Social Worker	90837	386	\$155,240.63
5	CHILD AND FAMILY GUIDANCE CENTER	526 - Enhanced Care Clinic (ECC)	90837	478	\$145,251.87
6	STOKES COUNSELING SERVICES LLC	121 - Professional Counselor	90837	327	\$132,688.71
7	CORTNEY DUNLAP LPC LLC	121 - Professional Counselor	90837	76	\$112,609.70 ←
8	UNITED SERVICES INC	526 - Enhanced Care Clinic (ECC)	90837	429	\$96,380.83
9	SHORELINE WELLNESS BEHAVIORAL HEALTH CLINIC, LLC	525 - Mental Health Clinic	90837	259	\$94,507.92
10	CORTNEY DUNLAP	121 - Professional Counselor	90837	80	\$90,466.28 ←

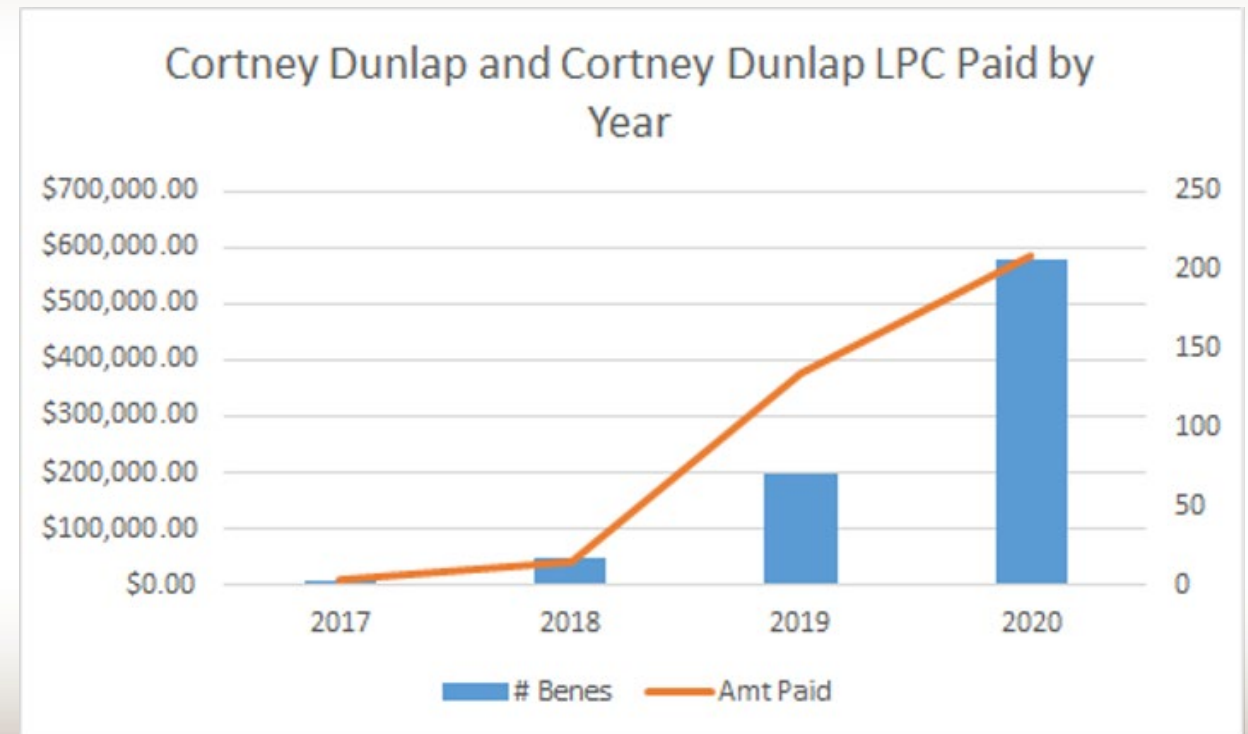


Proactive Data Mining 90837



Exponential Growth in Medicaid Payments thru March 2020

Month	Amount Paid by Medicaid
October 2019	\$ 47,513
November 2019	\$ 47,694
December 2019	\$ 50,292
January 2020	\$ 75,748
February 2020	\$ 237,936
March 2020	\$ 270,453





Proactive Data Mining 90837



- Paid for 67 days with services amounting to between a 24 to a 150 hour day
- Same Diagnosis for all patients
- Paid \$6,245 for services performed while on a cruise
- Dunlap's second highest paid patient is his sister
- No other approved providers within the LLC
 - (i.e. he alone was only one allowed to render services)



Cortney Dunlap



- December 2013 obtained CT Professional Counselor License and enrolled with Medicaid soon after.
- October 2018, new provider application for Cortney Dunlap LPC LLC with Medicaid.
- Owns other businesses receiving funds from CT Medicaid – Inspirational Care and KEYS Program.
- Also, a Guidance Counselor at New Haven Adult & Continuing Education (NHAE) full-time.





Initial Investigation



- Conducted Telephonically Interviews – targeted patients that most likely did not receive services
 - Billed as if he provided a psychiatric evaluation to 45 different Medicaid patients on February 2, 2020
 - Billed same patients for the next 36 consecutive days
- Stepson selected inadvertently
 - Spoke to stepson's mother: "he wouldn't go if you paid him"
 - Spoke to stepson: "he's my stepdad", no and laughed



Initial Investigation

Conducted Surveillance of Office



Not listed





Unanswered Questions



April 24, 2020 (1 Month)

1) Why patients in clusters near New Haven, Waterbury, Bristol and Cromwell when the office is miles away in Hartford





Unanswered Questions

2) Where is the office?

- Paper records per enrollment but possible EMR use
- Office only lists associate company
- Minimal activity due to COVID shutdown

3) Who does the billing/fraud point?

- Using a billing company or staff

4) Full time position at NHAE

- What hours is he working
- What is his role – does he have access to student records





Unanswered Questions

5) Next Medicaid payment cycle will close at the end of the day with a \$333,777 payment to be processed to Dunlap and paid out April 28th?

- Work with state agency to suspend that payment and hold back notice to Dunlap

Pursuant to 42 CFR 455.23, the Department is required to temporarily suspend payments to enrolled prov there is a credible allegation of fraud. This email is to inform you that effective **Friday, April 24, 2020** all p the following providers must be suspended:

Provider Name: Cortney Dunlap
NPI #: 1720390115
AVRS #: 008049143
Prov Type: 33 – BH Clinician
Prov Specialty: 121 – Professional Counselor

Provider Name: Cortney Dunlap LPC LLC
NPI #: 1063980332



Unanswered Questions



- Ruse Call conducted on April 27, 2020
 - Confirmed office location
 - Confirmed paper records used/maintained at office
 - Confirmed patients seen at their homes or in office
 - Confirmed staff does billing
 - Stated his staff provides behavioral health services
- When asked if state can make changes Dunlap asked for prior approval process to be expedited to begin billing process quicker





Unanswered Questions



Dunlap calls State on April 28th looking for his money.
State advised Dunlap to call the USAO.

On May 5th, Dunlap calls USAO asking for a call back.

We go that afternoon to interview him!

(During COVID Shutdown; Opportunity to generate more material for the affidavit)



Unanswered Questions



Interview of Dunlap May 5, 2020

Providers – several employees provide services – they have "*lots of experience*". He used to see 40-50 himself.

Medical Records – on paper at the office

Billing – Tells us which computers were used for the billing laptop and showed his phone and state Medicaid links

NHAE – not taking names from work but getting them from housing authority referrals



Unanswered Questions



Interview of Cortney Dunlap May 5, 2020

"I'm new to billing"

"My life is ruined"

"Am I going to jail?"

When told the billing portrays a pattern of fraud, he said "I completely agree with that"



Search Warrant



Search Warrant Executed May 7, 2020

- After only 44 days of investigation while 100% teleworking
- Only one box of evidence obtained
- Seized his laptop & billing computer
- Seized his cellular telephone
- Seized bank funds of \$412,415





Additional Investigation



- Processed the Warrant materials & computer evidence
- Completed Bank Record Analysis
- Conducted additional "patient" interviews
- Look into his NHAE job
- Researched interactions with the state Medicaid system
 - Approval for behavioral health, ID look-ups, log-ons

WHAT DID WE FIND?



Additional Investigation

Bank Records Analysis:

- Down Payment for House
- Vacations for family
- Jet skis
- Family members are employees
- Paying rent for family and others – Why?





Additional Investigation



NHAE

- Interviewed Principal
- Served Subpoenas
- Analyzed computers



Conclusion – Dunlap used his position to take identities of approximately 136 students at New Haven Adult and Continuing Education Center, determined who were Medicaid recipients and billed as if he provided them services



Additional Investigation

Homes were leased/owned directly by Dunlap or his business partner. Many of the women/children residing there were victims of domestic violence. He required them to provide insurance info to live there.

Packet Check List:

K.E.Y.S Program INC. ~ 'Keep Earning Your Success'

Packet Check List:

1. Agreements & Forms ✓
2. Goals ✓
3. Medical Card ✓
4. Security Deposit ✓
5. Photo ID ✓
6. Schedule Move in date ✓
7. Donation requirements 90 days 3/3/2020

* move out date 6/1/2020

100 Broad St 100 Hartford, CT 06103-5505 | 860-424-5505 | keyprograminc@gmail.com

Cortney Dunlap CEO / Owner | Ebony Dunlap Program Director Property Management | Eben Kilduff Assistant Program Director

3. Medical Card ✓

Child Agreement: Housing / Visitation

Insurance Info:

K.E.Y.S Program INC. ~ 'Keep Earning Your Success'

Child Agreement: Housing / Visitation

Program Occupant Name: _____

You will be responsible for your child(ren) and their actions inside the home as it pertains to damage or daily actions inside the home.

Child(ren):

Name:	DOB:	Insurance Info:	Visitation

100 Broad St 100 Hartford, CT 06103-5505 | 860-424-5505 | keyprograminc@gmail.com

Cortney Dunlap CEO / Owner | Ebony Dunlap Program Director Property Management | Eben Kilduff Assistant Program Director



Additional Investigation



Interviewed Patients: Employees, Group Home Tenants, NHAE students, Former Patient

NO ONE received services

NO ONE knew he billed for them

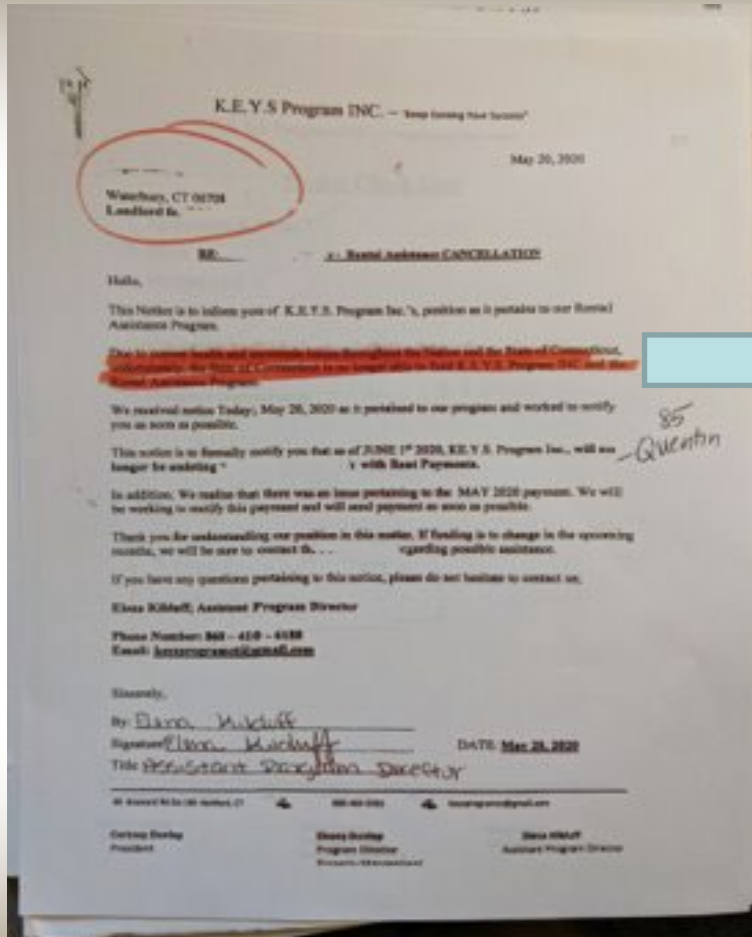
MOST were mad & upset

Conclusion – 100% fraudulent billing of psychotherapy services had occurred





Additional Investigation



May 20, 2020 (Post Search Warrant)

Due to current health and economic issues throughout the Nation and the State of Connecticut, unfortunately, the State of Connecticut is no longer able to fund KEYS Program and the Rental Assistance Program.

Effective June 1, 2020 we will no longer be assisting you with your rental payments.

(Business Partner's property tenants)

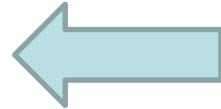


Additional Investigation

At the end of May 2020 (post SW), Required tenants to attend group therapy

“State Program Regulations...These meetings are **MANDATORY** and **REQUIRED**, no exceptions”

Every resident was required to sign an acknowledgment



K.E.Y.S Program INC. ~ "Keep Earning Your Success"

CROMWELL / CAPITAL AVE

Program Agreement: Weekly Group Check - In

Due to the State of Connecticut's changes in state program regulations, K.E.Y.S. Program Inc's., Program Occupants will be required to attend WEEKLY meetings with a Licensed Clinical Social Worker (LWS).

To remain in K.E.Y.S. Program Inc., as a program occupant and our housing units, these meetings are MANDATORY and REQUIRED; no exceptions.

Meetings as of June 1st 2020, will be held virtually via a video conference until stated otherwise. A link will be sent to you to access the meetings virtually. You will be able to participate with your phone, tablet or computer.

Meetings will be held on:
 FRIDAY: 7-8pm
 SATURDAY: 11am - 12pm
(You only need to attend 1 of the above meetings per week)

If you decide to not participate in this aspect of the program; decide not to attend the weekly meetings, and / or continue to follow program guidelines, you will receive your 30 day notice to move out OR you may pay the full housing fee of \$750 a month plus some of the cost of utilities.

If you miss a meeting, you will be place on probation and a determination of your involvement with the program will be assessed; with the possibility of the above stated consequences.

90 Branard Rd Ste 105 Hartford, CT 860-404-5501 Keyprogramct@gmail.com

Cortney Dunlap President
 Ebony Dunlap Program Director
 Elena Kilduff Assistant Program Director

K.E.Y.S Program INC. ~ "Keep Earning Your Success"

CROMWELL / CAPITAL AVE

ACKNOWLEDGMENT:
 By signing below, I understand that the program requirements have changed. I understand that I must attend one of the above stated weekly meetings; no exceptions. Failure to participate in the weekly meetings or continue to follow program guidelines may result in a 30 day notice to move out, OR pay the full housing fee of \$750 plus the cost of utilities.

Date: _____

K.E.Y.S Program Inc.
 Administration TITLE: Assistant Program Director

Program Occupant: _____
 Date: 5/28/2020

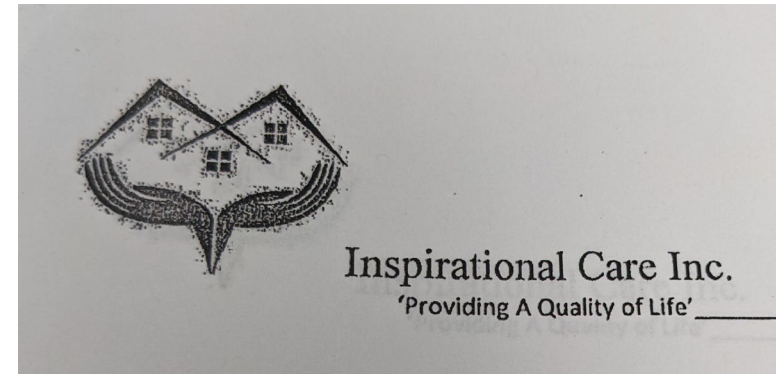
90 Branard Rd Ste 105 Hartford, CT 860-404-5501 Keyprogramct@gmail.com

Cortney Dunlap President
 Ebony Dunlap Program Director
 Elena Kilduff Assistant Program Director



Additional Investigation

- June 5th began same fraudulent billing for psychotherapy services under the Medicaid Billing ID for another company he owned, Inspirational Care.
 - Listed a new service provider, a LCSW with no prior association
 - 45 patients in one day
 - Individual psychotherapy billed, not group
 - All children and adults living in the homes were billed





Additional Investigation



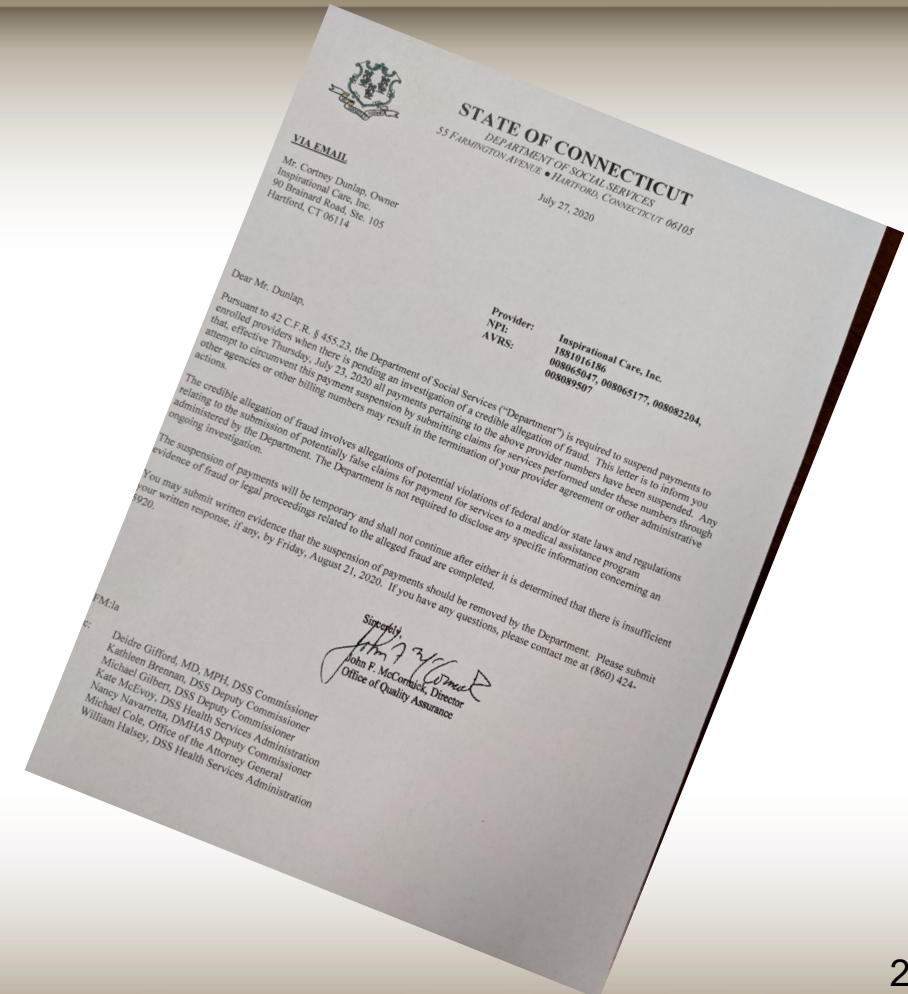
- Interviewed new provider June 30, 2020
 - Was told by Dunlap state had audited him and he got into trouble billing things wrong.
 - Denied ever having 45 patients.
 - Denied services to any child, except one.
 - Denied individual counseling provided, only group sessions.
 - Denied rendering services before June 5th.
- After our interview, Dunlap made some corrections to those billings, but still not accurate



Additional Investigation



Medicaid Suspension of
Dunlap's associated entity
Inspirational Care Inc.
effective July 23, 2020.





Additional Investigation



Where did he get the names and IDs to bill?

- Gathered the computer evidence: date, location, and time of access to the Medicaid site was from Dunlap's home
- Dunlap searched: children/siblings', his attorney, and NHAE names in alphabetical order

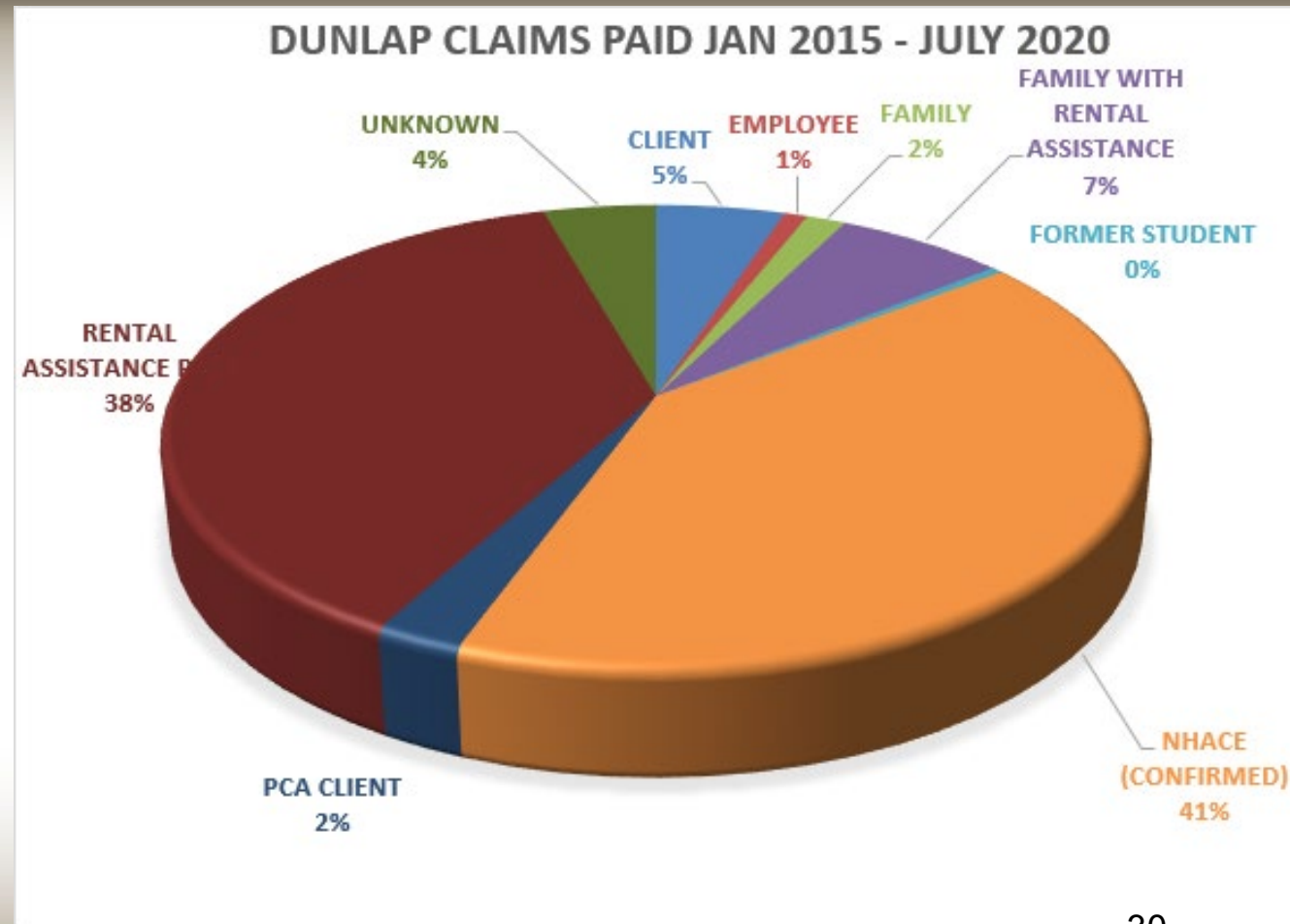
Conclusion – Dunlap was actively seeking Medicaid identification for names he gathered to bill Medicaid



Additional Investigation



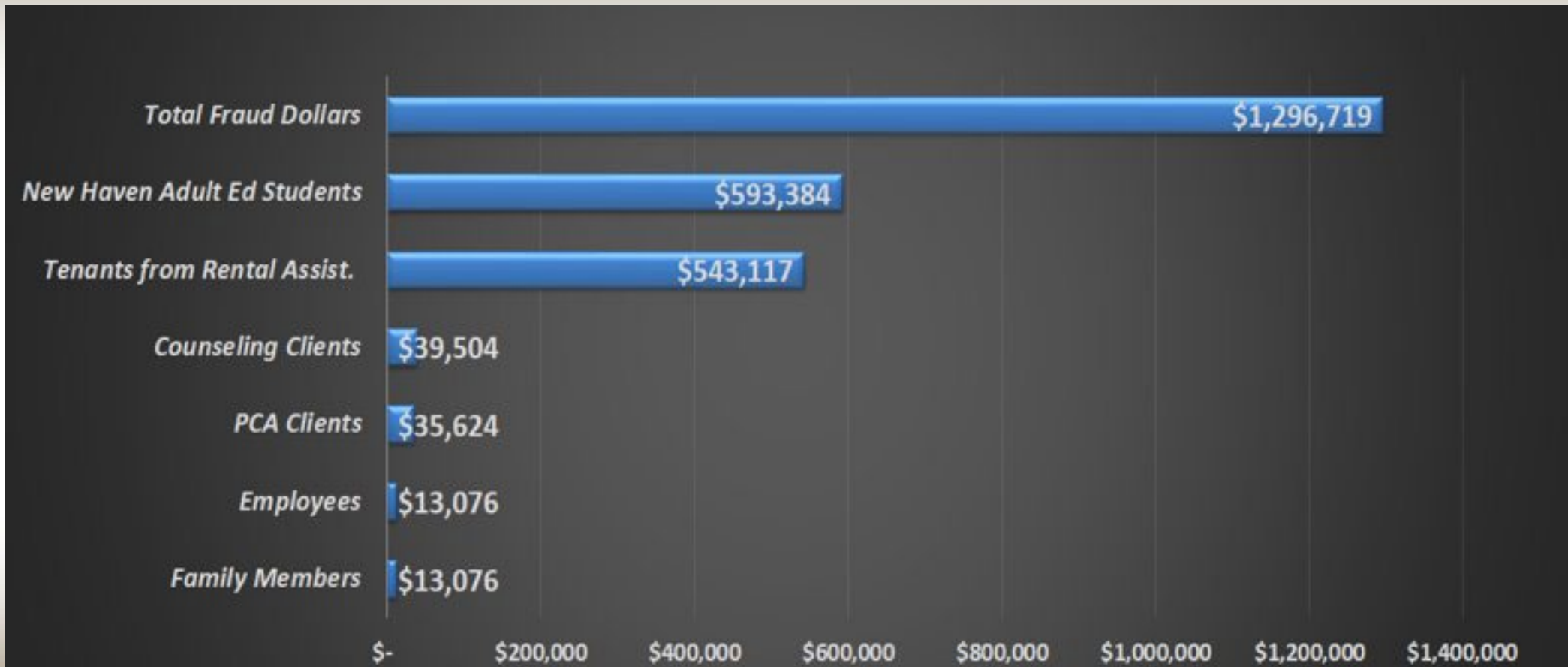
- Categorized billed patient based on the association they had with Dunlap.
- NHAE, Rental Assistance Tenants, Family, PCA Client, Employee, Actual Client.
- Only 4% of patient unknown





Additional Investigation

Summary of Medicaid Fraud Dollars of total \$1.4M billed





Additional Investigation



Understanding the Motive – Timeline Analysis

- Jan 2018 State turned him down for residential support service
- June 2018 Tenants begin at his newly leased residential property
- Aug 2018 First Medicaid billing for tenant
- Sept 2018 Billing up to 6 days a week for tenant, adds family members (24 days per month @ \$94 = \$2,256)
- Oct 2018 begins his LPC
- Dec 2018 Medicaid billing up to 12 hours per day



Additional Investigation



Understanding the Motive

- Jan 2019 Adds additional locations (Coles & Glenstone)
- Feb 2019 Medicaid billing up to 15 hours per day
- Feb 2019 hired by NHAE
- Apr 2019 State turned him down again for residential support services
- June 2019 to Nov 2019 Adds additional location leases, increases Medicaid billings up to 24+ hours per day



Additional Investigation



Understanding the Motive

- Jan 2020 begins Keys Programs for all the leases and tenant services
- Feb 2020 DXC lookup of employee names eligibility & Bills first NHAE student
- Over 150 units of service a day billed to Medicaid
- **Investigation begins Mar 25, 2020**

**Billing Pattern: 1x
90791 on 2/12/20 then
36x 90837 every day
2/13/20 -
3/19/20. Never Billed
Before**



Arrest & Prosecution

Arrested Dunlap October 14, 2020

Less than 7 months
since data mining
and case initiation.

Court still had COVID
limitations.

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT
for the
District of Connecticut

United States of America
v.
CORTNEY DUNLAP
Defendant

Case No. *3:20msj-856 KAR*

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) CORTNEY DUNLAP who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:
Violations of 18 U.S.C. § 1035 (False statement in a health care matter) and 18 U.S.C. § 1347 (Health care fraud)

Date: 10/5/2020

City and state: Hartford, Connecticut

Robert A. Richardson
Digitally signed by Robert A. Richardson
Date: 2020.10.05
10:52:00 EDT
Issuing officer's signature

Robert A. Richardson, U.S. Magistrate Judge
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____ at (city and state) _____

Date: _____
Arresting officer's signature _____
Printed name and title _____

United States Department of Justice

THE UNITED STATES ATTORNEYS OFFICE
DISTRICT of CONNECTICUT

HOME ABOUT MEET THE U.S. ATTORNEY NEWS PROGRAMS JOBS

U.S. Attorneys » District of Connecticut » News And Press Releases

Department of Justice
U.S. Attorney's Office
District of Connecticut

FOR IMMEDIATE RELEASE Thursday, October 15, 2020

Avon Man Allegedly Involved in Wide-Ranging Health Care Fraud Schemes Arrested



Arrest & Prosecution

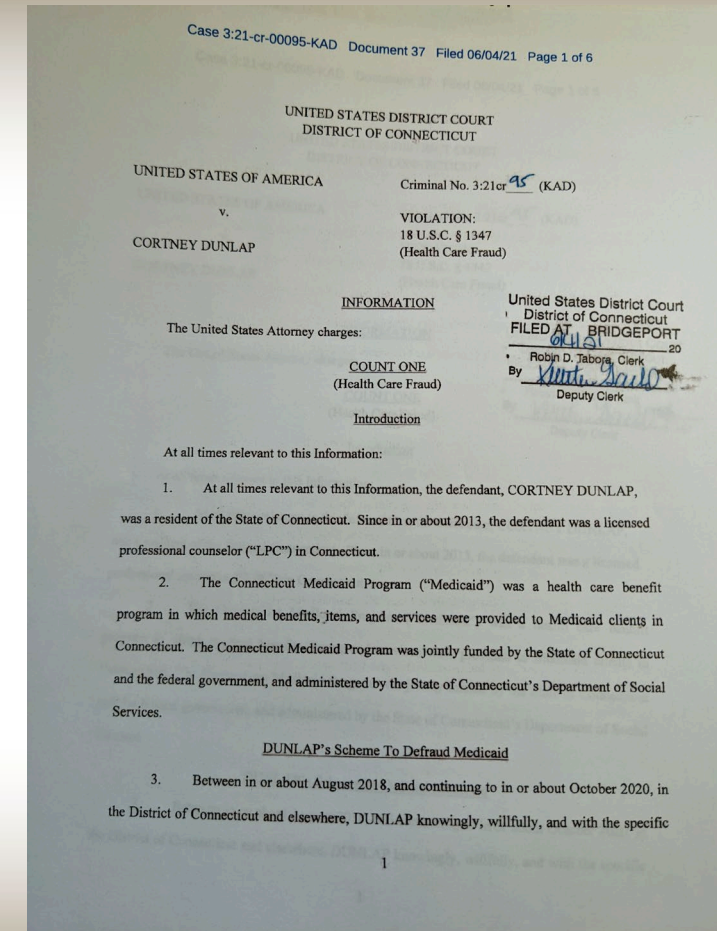


Agreed to a plea deal

Charged with one count of 18 U.S.C. § 1347 (Health Care Fraud)

Loss agreed to of \$1,313,322 from 2014 through 2020

Pled guilty to an Information on June 4, 2021





Arrest & Prosecution



Sentenced March 11, 2022 by Judge Dooley

Dunlap displayed a **"no limit"** attitude as he used a number of **"tentacles to hunt for victims"**

"No one's identity was safe" around Dunlap

When he was caught, he simply **"changed horses"** and took it as a call to **"do it better"**

The **"new home"** speaks to his motive



Arrest & Prosecution



Sentenced March 11, 2022 by Judge Dooley

"mitigating factors do not offset the aggravating factors to warrant a departure from the sentencing guidelines"

57 months in prison

\$1,313,322 in restitution to Medicaid

3 years supervised release

Sell his home and provide the proceeds to gov't



Arrest & Prosecution

Press Coverage

FOR IMMEDIATE RELEASE
June 4, 2021

CONTACT:
Tom Carson
Public Information Office
(203) 821-3722
(203) 996-1393 (cell)

COUNSELOR INVOLVED IN A WIDE-RANGING MEDICAID FRAUD SCHEME PLEADS GUILTY

Leonard C Boyle, Acting United States Attorney for the District of Connecticut, announced that CORTNEY DUNLAP, 36, of Burlington, waived his right to be indicted and pleaded guilty today before U.S. District Judge Kari A. Dooley in Bridgeport to health care fraud related to a wide-ranging scheme that defrauded the Connecticut Medicaid Program of more than \$1.3 million.

According to court documents and statements in court, from 2014 to 2020, Dunlap was a Licensed Professional Counselor with offices located on Brainard Road in Hartford. Dunlap also owned two entities, Inspirational Care and KEYS Program Inc., through which he managed group homes in Hartford, Bristol, Cromwell and Waterbury, including residences for women and children who were victims of domestic abuse.

From August 2018 through October 2020, Dunlap engaged in a scheme to defraud the Connecticut Medicaid Program by submitting claims for psychotherapy services that were purportedly provided to Medicaid clients. The vast majority of the claims were for occasions and dates of service when no psychotherapy services of any kind had been

U.S. Department of Justice
United States Attorney
District of Connecticut
www.justice.gov/ct

“The vast majority...no psychotherapy services of any kind had been provided”

provided to the Medicaid clients identified in the claims. On a limited number of occasions, some of the services were rendered by unlicensed individuals who were not qualified or licensed to provide psychotherapy.

The Connecticut Medicaid program suspended Dunlap as a Medicaid provider on approximately April 28, 2020, and on May 7, 2020, Federal prosecutors conducted a court-authorized search of Dunlap's Hartford

copy services through Inspirational Care for services that used clinical social worker who did not provide the copy used to bill for the nonexistent services.

or managed by Inspirational Care and KEYS program to bill the state as a condition of the terms of his residency. Dunlap accessed Medicaid for psychotherapy services that at the Medicaid member for numbers of approximately 650, and Medicaid paid Dunlap approximately \$543,117 for such services.

Dunlap also engaged in a scheme to defraud the Connecticut Medicaid program by submitting claims for psychotherapy services that were purportedly provided to the Medicaid member for numbers of approximately 135 New Haven Adult and Continuing Education, many of whom he never met. Dunlap used the information he acquired to identify, identify the students' Medicaid member for psychotherapy services that were never provided to the Medicaid member for numbers of approximately 135 New Haven Adult and Continuing Education, many of whom he never met. Dunlap used the information he acquired to identify, identify the students' Medicaid member for psychotherapy services that were never provided to the Medicaid member for numbers of approximately 135 New Haven Adult and Continuing Education, many of whom he never met.

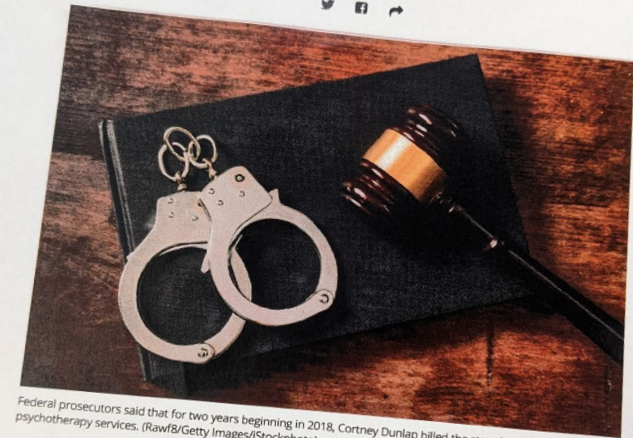
psychotherapy services purportedly provided to employees of submitted fraudulent claims to Medicaid for his family when no such services were provided. On June 14, 2020,

21, at which time Dunlap faces a maximum term of 18 months in prison and a fine of up to \$1,313,322. To help pay for his legal defense, Dunlap opened a bank account containing approximately \$152,000. Dunlap was charged with conspiracy to defraud the U.S. Department of Health and Human Services, with the assistance of the Office of the Inspector General, the Office of the Inspector General for the U.S. Department of Health and Human Services, the Office of the Inspector General for the U.S. Department of Social Services, and the Connecticut Chief State's Attorney's Office, the Office of the Inspector General for the U.S. Department of Social Services.

by David J. Sheldon with the assistance of Auditor Susan

The owner of Hartford businesses that ran group homes across the state admits fraud operating a \$1.3 million in Medicaid

By EDMUND H. MAHONY
HARTFORD COURANT | JUN 05, 2021



Federal prosecutors said that for two years beginning in 2018, Cortney Dunlap billed the state for non-existent psychotherapy services. (Raw8/Getty Images/Stockphoto)

The manager of groups homes for abuse victims and others with a variety of mental health problems admitted in federal court Friday that he defrauded the state Medicaid program of more than \$1.3 million by billing the state for psychotherapy services that were never provided to clients.

Cortney Dunlap, 36, of Burlington was a licensed professional counselor who owned two Hartford-based companies that managed group homes in Hartford, Bristol, Cromwell and Waterbury. The businesses offered counseling and other services for low income clients with an array of emotional, neurological and psychiatric problems.



Thank You



U.S. v Courtney Dunlap

Janet Ambrisco, Special Agent FBI, jeambrisco@fbi.gov, 347-582-9874

Joint Investigation with HHS-OIG Special Agents Jeffrey Anderson & Ryan Driscoll, Hartford, CT

Assistance rendered by US Dept. of Ed. OIG, US Dept. Housing & Urban Dev. OIG, CT Medicaid Fraud Control Unit, CT AG's Office & CT Dept. of Social Services