

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA )  
)  
Plaintiff, )  
)  
vs. )  
)  
CATHY J. BEAL, )  
)  
Defendant. )

Criminal No. 17-40044-JPG  
Title 18, United States Code, Section 1347

**FILED**

JUL 12 2017

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
BENTON OFFICE

INDICTMENT

**THE GRAND JURY CHARGES:**

1. **CATHY J. BEAL** defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary and the personal assistant must sign an Individual Provider Payment Policies form. The qualified beneficiary must have a Service Plan listing all services to be provided. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Program Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.

2. The Home Services Program is a Medicaid Waiver Program designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division of Rehabilitation Services (DORS) administers the program.

Medicaid Waiver programs enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily, be covered under Medicaid.

3. On March 26, 2014 and again on September 3, 2015, 2015 BEAL signed an Individual Provider Standards form.

4. On March 3, 2014 and again on September 3, 2015, BEAL signed an Individual Provider Payment Policies form. Among other things, the Individual Provider Payment Policies form states the following:

- *Individual Providers can only be paid for the hours they worked for the customer per the HSP Service Plan. Billing/or hours not worked constitutes Medicaid fraud.*
- *Individual Providers can only be paid for hours and tasks performed in the customer's home unless the task must be completed outside the home such as laundry due to no facilities in the home, banking, and grocery shopping.*

5. From on or about April 1, 2014 through on or about June 15, 2016, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, BEAL submitted Home Services Program Time Sheets on which she falsely claimed hours of personal assistant services at various times during the above dates, in that claimed services were not performed on all of the dates and times reported on the Home Services Program Time Sheets.

BEAL signed each time sheet under the following printed information:

*I certify that the above information is true and in accordance with the Individual Provider Payment Policies (IL488-2252). I understand falsification of any information submitted on this form could lead to criminal prosecution.*

**COUNT 1**

**Healthcare Fraud**


6. Paragraphs 1 through 5 are re-alleged and incorporated in Count I.
7. On or about June 15, 2016, in Richland County, within the Southern District of Illinois,

**CATHY J. BEAL,**

defendant, did knowingly and willfully execute a scheme to defraud a health care benefit program, affecting interstate commerce as defined in Title 18, United States Code, Section 24(b), namely Medicaid, in connection with the delivery of and payment for health care benefits and services by submitting time sheets and receiving payment for personal assistant services not performed, in particular, services falsely claimed to have been performed on June 13, 2016, in violation of Title 18, United States Code, Section 1347.

**A TRUE BILL**

FOREPERSON



MICHAEL J. QUINLEY  
Assistant United States Attorney



DONALD S. BOYCE  
United States Attorney

Recommended Bond: \$5,000 unsecured