

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

UNITED STATES OF AMERICA)
)
Plaintiff,)
)
vs.)
)
HOLLY ADAMS,)
)
Defendant.

Criminal No. 17-30107-SMY
Title 18, United States Code, Section 1347

FILED

JUN 21 2017

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

INDICTMENT

THE GRAND JURY CHARGES:

1. **HOLLY ADAMS** 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 January 24, 2015 ADAMS signed an Individual Provider Standards form along with a qualified Medicaid beneficiary identified hereafter as S.J.

4. On January 24, 2015, ADAMS and S.J. 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 for 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 14, 2016 through on or about August 31, 2016, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, ADAMS submitted Home Services Program Time Sheets on which she falsely claimed hours of personal assistant services on April 14, 19 and 21 2016, June 20, 21, 25, 26 and 27, 2016, July 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29 and 30 2016, August 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 and 31 2016 that were not performed on the dates and times reported on the Home Services Program Time Sheets for S.J. ADAMS 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 various dates from April 14, 2016, through on or about April 21, 2016, in Bond County, within the Southern District of Illinois,

HOLLY ADAMS

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 violation of Title 18, United States Code, Section 1347.

COUNT 2

Healthcare Fraud

Paragraphs 1 through 5 are re-alleged and incorporated in Count 2.

On various dates from June 20, 2016 through on or about August 31, 2016, in Bond County, within the Southern District of Illinois,

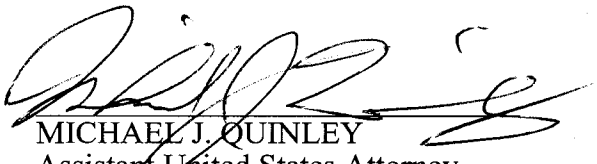
HOLLY ADAMS,

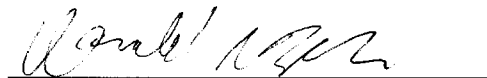
defendant, did knowingly and willfully execute a scheme to defraud a health care benefit program, affecting interstate commerce as defined in Title 18, United States Code, Section 24(b), namely Medicaid, in connection with the delivery of and payment for health care benefits and services by submitting time sheets and receiving payment for personal assistant services not performed, in 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: \$10,000 unsecured