



**WRITTEN TESTIMONY FOR HEARING ON “THE WAR  
ON WASTE: STAMPING OUT THE SCOURGE OF  
IMPROPER PAYMENTS AND FRAUD.”**

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*Presented to*

**Subcommittee on Delivering on Government Efficiency  
Committee on Oversight and Government Reform  
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Chairwoman Greene, Ranking Member Stansbury, and members of the subcommittee: Good morning. My name is Stewart Whitson, and I am the Senior Director of Federal Affairs at the Foundation for Government Accountability (FGA).

FGA is a non-profit organization that seeks to enhance the lives of all Americans by improving welfare, workforce, and other policy. Our work also focuses on promoting limited, constitutional government through deregulation, transparency and accountability. Before joining FGA, I served as a special agent and eventually as an acting section chief at the Federal Bureau of Investigation (FBI).

### **A key source of wasteful spending for DOGE and this subcommittee to address: Medicaid improper payments and fraud.**

On the campaign trail President Trump promised, if elected, to take on the bloated bureaucracy in D.C.; rebuild trust in the Department of Justice (DOJ) and the FBI; crack down on waste, fraud, and abuse; and restore common sense. And on Day One, he started delivering on those promises with a wave of executive orders and the official launch of the Department of Government Efficiency (DOGE), which he has tasked Elon Musk to lead.<sup>1</sup>

In President Trump's words, the purpose of DOGE is to help "pave the way for [the Trump] administration to dismantle government bureaucracy, slash excess regulations, cut wasteful expenditures, and restructure Federal Agencies..."<sup>2</sup> Already, DOGE efforts have brought to the public's attention countless examples of wasteful spending including:

- \$1.5 million to advance DEI in Serbia's workplaces.
- \$70,000 for a production of a DEI musical in Ireland.
- \$47,000 for a transgender opera in Colombia.
- \$32,000 for a transgender comic book in Peru.<sup>3</sup>

The list goes on.

But rather than applauding the work of DOGE in helping to end such wasteful spending, some have launched a coordinated campaign to try to demonize Mr. Musk with the hope of somehow shifting focus away from the disastrous waste, fraud, and abuse that occurred on their watch. No matter what political party you happen to hail from, I think we can all agree that, in retrospect, the \$10 million worth of meals that went to al Qaeda-affiliated fighters in Syria during the previous administration was probably not the best use of taxpayer money.<sup>4</sup>

In addition to the countless examples of wasteful and even reckless spending uncovered by DOGE so far—such as \$188,000 provided by USAID to a non-profit linked to a designated terrorist organization—there is another key source of wasteful spending that DOGE and this subcommittee should set their sights on next: Medicaid waste and fraud.<sup>5</sup>

While initially meant as a program for the truly needy, Medicaid has bloated into a massive welfare program for millions of able-bodied adults lured into the trap of government dependency.<sup>6-7</sup> Nearly

85 million people are now dependent on the program, nearly two and a half times as many as in 2000.<sup>8-9-10</sup>

Unfortunately, as Medicaid has grown, so too has its mismanagement. Nearly one-third of all federal improper payments are attributable to Medicaid.<sup>11</sup> Today, more than one in five dollars spent on Medicaid is improper.<sup>12</sup> **Improper spending in Medicaid alone is on track to cost more than \$1 trillion over the next 10 years.**<sup>13</sup>

More than 80 percent of Medicaid improper payments are due to eligibility errors.<sup>14</sup> The root cause of this high rate of waste in the program is intentional policy choices—regulations that make it easier to get on the program and stay on as long as possible, even among those who are not actually eligible.<sup>15</sup> That includes enrolling individuals in the program before verifying key eligibility factors, including income, household composition, residency, and even immigration status.<sup>16-17</sup> This has allowed illegal aliens to enroll in the program, despite clear federal prohibitions, and remain on the program for months or even years at a time while states ostensibly attempt to verify their status *after* enrollment—a process that states report has taken more than 5,000 days in some cases.<sup>18</sup>

So, what's the cause of all of this? The Obama and Biden administrations pushed rules and guidance that limited efforts to verify eligibility for welfare programs and caused improper payments and fraud to skyrocket. In 2012, the Obama administration issued a regulation blocking states from checking Medicaid eligibility more than once a year for able-bodied adults and children, even as their circumstances frequently change.<sup>19</sup> In 2014, the Obama administration suspended its review of states' eligibility determinations altogether—a pause that continued until President Trump restarted the reviews in 2018.<sup>20</sup>

Rather than taking steps to solve the crisis of improper payments, the Biden administration doubled down, issuing a rule to make it even more difficult for states to verify eligibility. This 2024 rule, known as the Medicaid “streamlining” rule, applied those same Obama-era restrictions across all eligibility groups, prohibited in-person or phone interviews to verify eligibility criteria, unilaterally eliminated program integrity options created by Congress, weakened verification of immigration status, and required a lengthy “reconsideration” period if a person is deemed to be ineligible, during which the case is left open.<sup>21</sup> The Congressional Budget Office estimates that this rule will cost taxpayers \$224 billion over the next decade.<sup>22</sup>

The Biden administration also repeatedly extended the public health emergency, requiring states to keep millions of ineligible enrollees on the program for years longer than they should have.<sup>23</sup> By the time the public health emergency ended, more than 100 million people were on Medicaid, including more than 21 million ineligible enrollees.<sup>24-25</sup>

Even after the public health emergency ended, the Biden administration extended deadlines for states to remove ineligible enrollees, allowing them to remain on the program even longer.<sup>26</sup> The Biden administration also approved state requests to allow multi-year “continuous eligibility” for certain populations—allowing individuals to stay enrolled in Medicaid despite income changes or other factors that would render them ineligible.<sup>27</sup> States were also encouraged to accept self-attestation of certain eligibility factors and not verify eligibility until after applicants were enrolled

in the program.<sup>28</sup> The Biden administration also ended state efforts to add work requirements for able-bodied adults on Medicaid, 62 percent of whom do not work at all.<sup>29</sup>

Medicaid, like all welfare programs, is highly susceptible to fraud and improper payments. But the Biden administration's efforts to loosen eligibility requirements, expand the enrolled population, and keep people on Medicaid as long as possible exacerbated these problems. Fortunately, there are specific actions Congress can take in coordination with the Trump administration to get the country back on track.

### **Congress can assist President Trump in the effort to stamp out improper payments, other wasteful spending, and fraud.**

Stopping Medicaid improper payments and fraud will require a combination of tighter internal controls as well as policy changes that safeguard against fraud and abuse while promoting program integrity. Congress—with the help of this subcommittee—can work with DOGE and other departments in the administration to take action to reverse the harms caused by the previous administration and restore program integrity to Medicaid.

#### **Reduce Medicaid improper payments and fraud by improving program integrity and promoting work.**

To prevent fraud and reduce improper payments in Medicaid, Congress should take the following five actions:

First, repeal Biden's Medicaid "Streamlining" rule.<sup>30</sup> Again, this rule prevents states from verifying eligibility more than once per year, prohibits in-person or phone interviews to verify eligibility criteria, and requires a lengthy reconsideration period if a person is deemed to be ineligible, during which the case is left open.<sup>31</sup> Congress should repeal this rule through reconciliation. Doing so will save an estimated \$164 billion over 10 years.<sup>32</sup>

Second, rather than accepting self-attestation of eligibility factors, states should be required to verify all criteria *before* enrollment into Medicaid and use interviews to prevent identity theft and fraud.

Third, Congress should require states to verify eligibility at least once every six months for non-elderly and non-disabled enrollees and run data cross-checks against other records to help prevent fraudulent payments to those enrolled in multiple states or who earn above the income limit.

Fourth, Congress should require states to implement work requirements for able-bodied adults on Medicaid, 62 percent of whom do not work at all.<sup>33</sup> Requiring these non-elderly, able-bodied adults to work or engage in work-related activities even just part time would save \$241 billion in federal spending over 10 years.<sup>34</sup>

Fifth, Congress should work with the Trump administration to ensure that an effective nationwide National Accuracy Clearinghouse (NAC) is implemented without further delay and that it applies across all major welfare programs, including food stamps, cash welfare, and Medicaid.<sup>35</sup>

To reduce improper payments and fraud in Medicaid, it all comes down to better verification on the front-end to ensure that only those eligible for Medicaid are enrolled in the program, and then, more frequent checks after someone is enrolled to ensure those that become ineligible are moved out of the program without delay.

At the end of the day, Medicaid should be there for those who truly need it—children, the elderly, and the disabled. But right now, it’s being abused by millions of people who do not qualify for Medicaid. Every dollar wasted on ineligible enrollees is a dollar stolen away from seniors who need long-term care, children with disabilities, and truly needy families. By taking the five actions outlined above, Congress can ensure Medicaid remains sustainable for those who need it most.

**Congress must also help the Trump administration ensure that entrenched bureaucrats don’t stand in the way of reform.**

With a new administration in office poised to do what is required to reduce improper payments and fraud, one big hurdle remains: entrenched bureaucrats pledging to fight against President Trump’s efforts to improve government accountability and efficiency.<sup>36</sup> Some even seem to be using their current positions of authority to try to pressure and brow beat their subordinates to “dig in” against the administration alongside them; a clear act of insubordination.<sup>37</sup>

While the vast majority of government employees are incredible, hardworking people who love our country and will faithfully execute their duties under the law—I should know, I served alongside many of them for a decade in the FBI—those who have promised to resist the policy decisions of the Trump administration should not be permitted to do so. And those who have engaged in past behavior warranting dismissal, or who refuse to come to work when ordered to do so must be fired. Personnel is policy. And with insubordinate acts of resistance to the lawful orders of the president taking place across the country, it has become clear that personal politics is driving bureaucratic resistance.

While three-quarters of federal employees are “non-political” career personnel that are responsible for implementing and overseeing federal policy directives, the partisan affiliation of most of these government employees is overwhelmingly on the side of the Democrats.<sup>38</sup> In fact, 84 percent of political donations from federal employees went to Kamala Harris in 2024.<sup>39</sup> In an upcoming research paper, FGA will showcase a first-of-its-kind analysis that demonstrates the persistent Democrat margin in senior executive positions across the federal bureaucracy. On average, the career Senior Executive Service—which is charged with key policy-implementing responsibilities—has a Democrat advantage of about 30 percentage points over Republicans in terms of voter identification. Among D.C.-area workers, this rises to 40 percentage points. And in the nation’s key welfare-administrating agencies, it rises to nearly 60 percentage points.

There are more than 2.3 million employees in the executive branch, not counting contractors.<sup>40</sup> The cost to compensate these employees was just under \$360 billion in 2023, and projected to climb to over \$400 billion in 2025.<sup>41</sup> Spending on compensation for federal employees has grown by more than \$90 billion since 2019—a 31 percent increase.<sup>42</sup> Rigid federal employment regulations and laws make it difficult to fire or take any disciplinary action against federal employees, even in cases of

poor performance or misconduct.<sup>43</sup> The involuntary separation rate for federal employees is just 0.2 percent.<sup>44</sup> Because government agencies are not subject to market forces, they can just request larger budgets and more employees to cover the productivity gap left by poor performers, rather than taking action to improve productivity.

The Trump administration has already made strides to prevent wasteful spending and trim unnecessary bureaucracy, with much more to come.<sup>45</sup> Congress can help cement these reforms by codifying the president's authority to require agencies to eliminate vacant positions and consolidate non-essential positions, and by making it easier for the president to fire unproductive or insubordinate agency employees by making all executive branch employees at-will.

At the end of the day, federal agencies fall within the executive branch, and the president is the head of that branch. More importantly, the president and vice president are the only two officials directly accountable to the entire American people. Unelected career personnel interfering with the actions of the elected president and Senate-confirmed cabinet heads is antithetical to democracy. Codifying the president's authority to fire unproductive or insubordinate partisan bureaucrats before they can undermine the president's agenda is essential not only for efficiency's sake, but for the sake of democracy. Whatever political party a president hails from, he must be able to fire entrenched bureaucrats who openly undermine his agenda.

### **Make the DOGE reforms permanent by passing the REINS Act.**

Clearly, under the leadership of President Trump, the DOGE effort will help identify and eliminate an historic level of waste, fraud, and abuse. It will also aide the administration, in coordination with Congress, in rightsizing and bringing to heel the bloated bureaucracy in D.C. But there's one big problem. Most of the work done by DOGE can be undone by a future administration. To make the DOGE reforms permanent, Congress must act. And this subcommittee can and should serve as the command center for that effort.

The most important reform Congress can pass to help make the DOGE reforms permanent is the Regulations from the Executive in Need of Scrutiny (REINS) Act. The updated REINS Act, introduced by Senator Paul last week, would require new major regulations—those with a price tag of \$100 million or more—to receive congressional approval before going into effect, while exempting deregulatory actions.<sup>46</sup> This would return the Article I budgetary “power of the purse” to Congress while promoting deregulation.

Equally important, it would prevent a future administration from turning the faucet of improper and fraudulent payments back on. Without the REINS Act, a future administration could craft regulations that massively grow the size of federal agencies that President Trump has worked to trim and spend billions of taxpayer dollars without authorization from Congress as the Biden administration routinely did to the tune of more than \$1 trillion.<sup>47-48-49-50-51-52-53-54</sup> Passing the REINS Act would lock in the progress made by the Trump administration to reduce improper payments, crack down on fraud, and slash the size of government. It would also cement President Trump's legacy as the most consequential deregulatory president in U.S. history.

With that, I thank you for the opportunity to testify in today's hearing and I look forward to your questions.

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