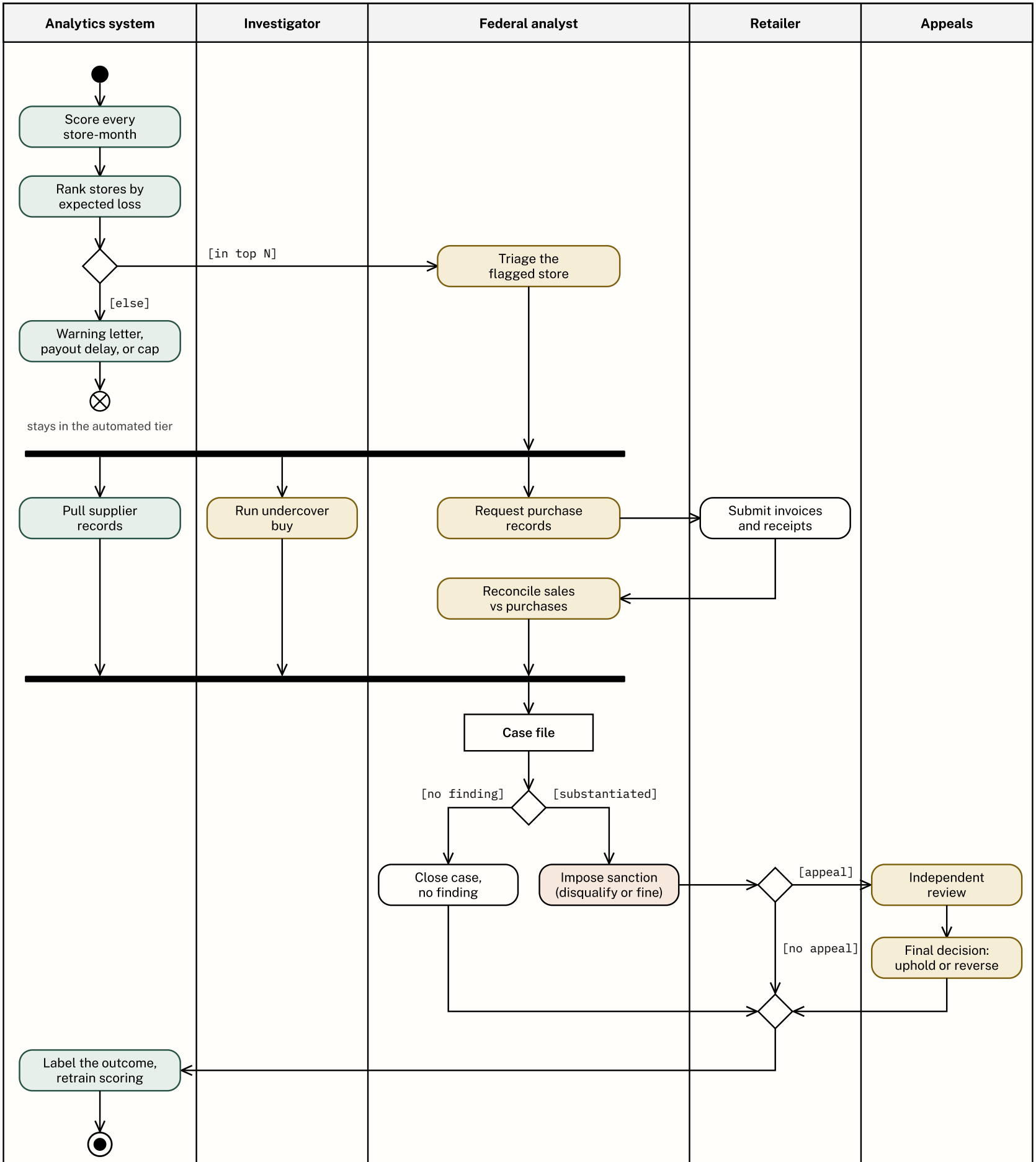
Analytics system
Investigator
Federal analyst
Retailer
Appeals
Score every store-month
Rank stores by expected loss
[in top N]
Triage the flagged store
[else]
Warning letter, payout delay, or cap
stays in the automated tier
Pull supplier records
Run undercover buy
Request purchase records
Submit invoices and receipts
Reconcile sales vs purchases
Case file
[no finding]
[substantiated]
Close case, no finding
Impose sanction (disqualify or fine)
[appeal]
Independent review
[no appeal]
Final decision: uphold or reverse
Label the outcome, retrain scoring