

DOJ's Fraud Division Launches New Whistleblower Program

October 21, 2026

On October 20, 2026, the Department of Justice and the National Fraud Enforcement Division (the "Fraud Division") announced the launch of the Fraud Whistleblower Incentive Program ("WHIP"), a new pilot program designed to pay whistleblowers \$10,000 to \$30,000 for tips that result in criminal fraud charges.¹ DOJ has described WHIP as the first whistleblower rewards program of its kind to offer an award at the charging stage, rather than at the conclusion of a case. The announcement follows the Fraud Division's October 1, 2026, Directive 26-12, which (as we [discussed previously](#)) directed Division leadership to design and implement policies and programs that appropriately incentivize whistleblowers to come forward with credible fraud information.² WHIP arrives just 19 days after that Directive.

The Program. According to DOJ, pursuant to WHIP, DOJ will pay a whistleblower \$10,000 to \$30,000—subject to DOJ's discretion—once DOJ obtains and unseals an indictment, information or criminal complaint based on the whistleblower's tip rather than waiting for a final resolution, sentencing or completion of any forfeiture or appeals process. A whistleblower who receives an early WHIP award remains eligible for potentially larger payments later under other DOJ whistleblower programs, including the Criminal Division's Corporate Whistleblower Awards Pilot Program.

At this stage, WHIP awards are limited to tips concerning fraud on the federal government, which is the top enforcement priority of the Fraud Division.³ In particular, the program covers federal healthcare offenses and fraud involving programs or benefits administered by the Departments of Agriculture, Labor, Health and Human Services,

¹ Press Release, U.S. Department of Justice, Office of Public Affairs, Justice Department Announces Innovative Whistleblower Rewards Program to Combat Fraud (Oct. 20, 2026), <https://www.justice.gov/opa/pr/justice-department-announces-innovative-whistleblower-rewards-program-combat-fraud>; National Fraud Enforcement Division, National Fraud Enforcement Division Criminal Tip Rewards Pilot Program, <https://www.justice.gov/fraud/national-fraud-enforcement-division-criminal-tip-rewards-pilot-program>.

² Debevoise & Plimpton LLP, "New DOJ Directive Details Fraud Division's Corporate Enforcement Priorities," Client Update (Oct. 2026), <https://www.debevoise.com/-/media/files/insights/publications/2026/10/new-doj-directive-details-fraud-divisions-corporat.pdf>.

³ See Debevoise & Plimpton LLP, "DOJ's New Fraud Division Sets Enforcement Priorities and Reshapes White Collar Enforcement Landscape," FCPA Update, Vol. 18, No. 1 (Aug. 2026), <https://www.debevoise.com/-/media/files/insights/publications/2026/08/fcpa-update-august-2026.pdf>.

Housing and Urban Development, Education, Veterans Affairs, and Defense and the Small Business Administration, with particular emphasis on fraud involving hospice care, home healthcare, daycare and special services. DOJ stated that the program could be expanded to additional fraud categories in the future.

To qualify, a tipster must voluntarily provide the Fraud Division with specific, truthful, complete, timely and original information in writing that leads to criminal charges in one of the covered subject areas and must cooperate with the government's investigation and any resulting prosecution. Information is not "original" if it is already known to DOJ, is derived from privileged communications or comes from certain compliance, audit or legal engagements, subject to limited exceptions.

As with other DOJ whistleblower programs, a tipster is ineligible if they meaningfully participated in the reported criminal activity, including by directing, planning, initiating or knowingly profiting from it, subject to a narrow carve-out for any individual whose role was so limited they could be considered a "minimal participant."

Reward determinations, including the amount of any reward and whether to pay at all, rest entirely within DOJ's discretion, are not subject to appeal or judicial review and are capped at one award per distinct tip.

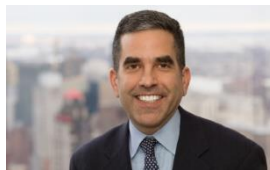
Practical Implications for Companies. WHIP's up-front payment structure is a notable departure from how federal whistleblower reward programs have traditionally operated and may accelerate whistleblower reporting. By offering the potential for payment at the charging stage, rather than requiring a whistleblower to wait through trial, sentencing, forfeiture and appeals, while allowing for the possibility of greater whistleblower rewards at the conclusion of the case, WHIP seeks to incentivize more reporting and generate more rewards, leading to greater publicity around the program and more widespread knowledge of the possibility of significant payouts for qualifying tips.

Companies operating in the healthcare sector or that participate in federally administered benefit programs (particularly in the hospice, home healthcare, daycare, and special services areas) should consider taking this announcement as an opportunity to review their internal whistleblower reporting policies and procedures. The need for effective internal reporting mechanisms and for prompt and thorough investigations of internal complaints has never been greater, with DOJ going to new lengths to incentivize reporting. At the same time, companies that identify potential fraud should promptly and carefully evaluate whether to self-report, as the potential benefits of self-reporting diminish considerably once DOJ has learned of the conduct from a whistleblower.

Please do not hesitate to contact us with any questions.



Helen V. Cantwell
Partner, New York
+1 212 909 6312
hcantwell@debevoise.com



Andrew J. Ceresney
Partner, New York
+1 212 909 6947
aceresney@debevoise.com



Daniel M. Gitner
Partner, New York
+1 212 909 6898
dmgitner@debevoise.com



Andrew M. Levine
Partner, New York
+1 212 909 6069
amlevine@debevoise.com



David A. O'Neil
Partner, Washington, D.C.
+1 202 383 8040
+1 202 809 1995
daoneil@debevoise.com



Winston M. Paes
Partner, New York
+1 212 909 6896
wmpaes@debevoise.com



Jane Shvets
Partner, New York | London
+1 212 909 6573
+44 20 7786 9163
jshvets@debevoise.com



Douglas S. Zolkind
Partner, New York
+1 212 909 6804
dzolkind@debevoise.com



Nicholas Folly
Counsel, San Francisco
+1 415 738 5754
nfolly@debevoise.com



José Jesús Martínez III
Associate, New York
+1 212 909 6893
jjmartinez1@debevoise.com

This publication is for general information purposes only. It is not intended to provide, nor is it to be used as, a substitute for legal advice. In some jurisdictions it may be considered attorney advertising.