

Big Bend Community Based Care Policy & Procedure

Series: 1300: Financial Management

Policy Name: Master Trust for Benefit of Family Safety and Preservation Program Clients

Policy Number: 1337

Origination Date: 1/29/2009

Revised: Board Meeting of 12/13/2018

Referenced Documents:

1300-1337 x 1, Authorization for Withdrawal of Funds

1300-1337 x 2, Client Trust Inventory Tracking Form

1300-1337 x 3, Master Trust Expenditure Plan

1300-1337 x 4, Client Designation Form

Policy

It is the policy of Big Bend Community Based Care, Inc. (BBCBC), to appropriately manage and access funds in a client's trust account in a manner that is to the client's benefit and within the established regulations of the Master Trust.

Procedure

A. Establishment of Master Trust Fund Sub-Account Procedure.

1. When a child comes into care, custody or control of the Department, the CBC centralized placement staff will complete an *Admission and Movement Form*. The original of this form will be sent to the Intake/Placement Specialist or Eligibility Assistant within seven (7) business days of a client's admission, leave of absence, discharge, death or movement. A copy of *Admission and Movement form* will be placed in the client's master file if the child receives Third Party benefits.
2. In addition, when a child comes into care, the Intake Specialist will complete a *Notarized Designation of Client Money and Property Form*, and have it notarized. The original will be forwarded to the Child Legal Services (CLS) attorney to be filed with the court.
3. Intake/Placement Specialist or Eligibility Assistant will forward Client Trust Specialist the following documents to create the file:
 - a. Shelter Petition;
 - b. Shelter Order;
 - c. Order to Establish Maser Trust Account, if applicable;
 - d. Admission and Movement Forms;
 - e. Notarized Designation of Client Money and Property;
 - f. Child In Care Title IV-E and Medicaid Application;
 - g. Initial Expenditure Plan;
 - h. Revenue Maximization Communication Form, if applicable;
 - i. Notification of Foster Care Funding, if applicable;
 - j. Change of Events-Representative Payee Reporting Form;
 - k. Birth Certificate.
4. If it is determined by Social Security that the client will receive benefit payments, the Client Trust

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Specialist will file the form in the Master Trust Fund Sub-account pending file until the benefits are received. Upon receipt of the benefits, the Client Trust Specialist will establish the Current Needs Sub-account.

5. When a child comes into care, an initial Expenditure Plan will be completed for SSI recipients to identify the child's current needs and will be again reviewed when quarterly Expenditure Plan updates are due (i.e., September, December, March, and June all are due by the 30th).

B. Deposits. Deposits for the month will come in two (2) ways — Direct Deposit and Manual Deposit. The deposits that are received for SSA are typically for the previous month and the deposits that are received for SSI are typically for the current month (i.e., SSA deposits are typically a month behind. SSI deposits are typically for the month of the deposit).

1. If the client has a deposit and will have no room and board because he/she left in a previous month, the deposit will be entered into the system of record before the conserved funds are returned, if the client has room and board for that month, funds will not be returned until the following month.
2. Information pertaining to specific deposits will be found in the client file in correspondence received from Social Security.
3. If a back payment for previous months or from a previous payee is received, the Client Trust Specialist will identify what month the payment is for, and if room and board will need to be collected from the deposit.
4. If a child enters a Medicaid paid placement, or is incarcerated for more than thirty (30) days and receives SSI, in any month, room and board payment may be collected for that month; however, in the following month, if a full benefit is received, all but Thirty Dollars (\$30.00) will be returned to the Social Security Administration. The Intake/Placement Specialist or Eligibility Assistant will notify the Client Trust Specialist of this placement. The Intake/Placement Specialist or Eligibility Assistant is responsible for completing and providing a change of events form to social security and forwarding a copy to the Client Trust Specialist for the client file.

C. Client Trust Fund Withdrawal Request Procedures. BBCBC responsibilities include:

1. The Client Trust Specialist will receive the Withdrawal Request Forms from the Dependency Case Manager or Intake/Placement Specialist or Eligibility Assistant.
 - a. Back up for the request must be attached for all requests except clothing, personal items or food.
 - b. Purchases are not tax exempt and should be added to the total.
 - c. An Anticipated Request must be submitted and approved before expenses are incurred, if there is not sufficient time for a check to be issued. The anticipated request should be sufficient to cover the anticipated cost of the purchase including taxes, shipping and potential added purchasing fees incurred. A Withdrawal Request must be submitted to the Client Trust Specialist and notification will be sent back to the Case Manager and Supervisor once request has been processed.
2. The Client Trust Specialist will verify sufficient balance in Client's Trust Fund account to honor Withdrawal Request and audit request for appropriate signatures as listed below. The following signatures are required on all Withdrawal Requests:

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| Amount | Authorization |
|---|---|
| Request under \$1000.00 | Supervisor of Case Manager |
| Request \$1000.00 and over and/or for individual property items \$500.00 and over | Program Manager & Intake/Placement Utilization Director |

3. The Client Trust Specialist or Director of Finance and Accounting or designee of BBCBC will approve Withdrawal Requests. When approved the request will be processed to issue a check from appropriate trust fund.
4. The Client Trust Specialist will receive receipts for the withdrawal from the DCM and audit for the following:
 - a. Ensures receipts are original.
 - b. Ensures receipts are for the items requested on the Withdrawal Request Form.
 - c. Ensures receipts total the amount of the withdrawal request. Any discrepancies will immediately be brought to the attention of the Intake/ Placement Specialist, Eligibility Assistant, Dependency Case Manager Supervisor and Dependency Case Manager.
5. The Client Trust Specialist will review the pending folder weekly to ensure receipts are being received within fifteen (15) days from the date of the check was mailed.

D. Dependency Case Manager (DCM) Responsibilities.

1. Monitor the amount of funds in client trust accounts to ensure that balance doesn't exceed allowable limits and thereby make client ineligible for benefits.
2. The DCM will provide original receipts for purchase of withdrawal request. These are to be client specific purchase for items listed on withdrawal request. The receipts will not exceed the total amount requested on the withdrawal request.
3. Ensure that all items purchased with money from the clients Master Trust Account are properly tagged/labeled appropriately. If an item Five Hundred Dollars (\$500.00) and over an inventory tag is assigned and documentation that CLS, GAL, Parent's Attorney, Child's Attorney was notified is placed in the file.
4. Ensure periodic Inventory checks are completed.
5. Ensure property is moved along with the client when placement changes occur.
6. Excess money from withdrawal request should be handled as follows:
 - a. Amount is Five Dollars (\$5.00) or less – May be given to the client for spending money, but client must sign a *Client Trust Fund Excess Money Attestation Form* and this form submitted with other purchase receipts.
 - b. Amount is Five Dollars and Once Cent (\$5.01) or more – Monies must be submitted with the receipts and forwarded to the BBCBC receptionist or designee.
7. If receipts are lost and cannot be found, the payee must complete and sign the *Master Trust Receipt Attestation Form*. This form must be completed with a list of the purchases for the lost receipt.
 - a. This form will be used for exceptions only.

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- b. Receipts will equal the total amount of the request.
- c. Excess funds will be deposited into the client's trust fund.

E. Client Trust Specialist Responsibilities.

1. Respond to the requests from DCF concerning the client trust accounts. BBCBC is the authorized representative payee for benefits paid by SSA and the client is the beneficiary.
2. Answer questions coming from Intake/Placement Specialist or Eligibility Assistant and Case Managers, and provide training on Client Trust issues in either a group setting or on an individual basis
3. **Processing.**
 - a. Process withdrawal requests and forward to Accountant.
 - b. Distribute client checks to appropriate Intake/ Placement Specialist or Eligibility Assistant/Case Managers.
 - c. Notify Intake/Placement Specialist or Eligibility Assistant of clients that have a balance of One Thousand Five Hundred Dollars (\$1,500.00) or more.
 - d. Scan and email correspondence from SSA to Intake Specialists
4. **Expenditure Plans.**
 - a. Send reminder to Intake Specialist when expenditure plans are due at the end of the month.
 - b. Act as a resource for expenditure planning
5. **Reports.** Provide Monthly balance reports to Intake/Placement Specialist or Eligibility Assistant.
6. Respond to requests from the Social Security Administration. Fill out Representative Payee Reports.

F. Request for Social Security Returns. Social Security returns must be identified with the reason for return including, but not limited to:

1. Over the limit;
2. Returning conserved funds due to closing account;
3. Child placed in a SIPP placement or other type of placement.

G. Room and Board Disbursement to the State.

1. Room and board disbursement will be completed and issued to DCF within sixty (60) days of the completion of the reconciliation.
2. A copy of all backup will be mailed to DCF at the address on the invoice. The original will be filed in the Client Trust filing cabinet in the folder labeled State of Florida.

H. Balance Reports. Once the account is reconciled with the bank statement a copy of the client's balances will be sent to the Intake/Placement Specialist or Eligibility Assistant.

I. Reconciling Accounts.

1. When the bank statements are received, the Client Trust Specialist will begin the process of reconciliation between Client Trust Accounts and the Bank.
 - a. The Client Trust Specialist will only reconcile after all deposits, room and board and interest has been entered.

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- b.** The Client Trust Specialist will only complete the reconciliation for each account after receipt of the accounting system reconciliation.
 - 2.** Reconciliation for both regular and dedicated accounts will be provided to the Chief Financial Officer (CFO) for approval.
 - a.** Upon receipt of the approved reconciliation, the Client Trust Specialist will forward a copy of all backup to DCF when requested.
 - 3.** The Client Trust Specialist is responsible for reconciling both regular and dedicated accounts.