

NWF Health Network 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 4/27/2023
Regulations: 65C-17, F.A.C.
420.17, F.S.
CFOP 170-59

Referenced Documents:

1337 x 1 - SSA-11-BK Request to be Selected as Payee
1337 x 2 - CF FSP 5222 Notarized Designation of Client Money and Property Form
1337 x 3 - CF 285D Notice of Fee Assessment and Rights of Foster Child
1337 x 4 - NWFHN Client Trust Checklist
1337 x 5 - NWFHN Authorization for Withdrawal of Funds Request Form
1337 x 6 - NWFHN Client Trust Inventory Tracking Form
1337 x 7 - NWFHN Client Trust Fund Excess Money Attestation
1337 x 8 - NWFHN Client Trust Fund Receipt Attestation
1337 x 9 - NWFHN Master Trust Expenditure Plan
1337 x 10 - NWFHN Change of Events – Representative Payee Reporting Form

Policy

It is the policy of NWF Health Network, Inc. (NWFHN), 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 of Children and Families (DCF), 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 Eligibility Assistant will complete the application to be appointed Representative Payee (SSA-11-BK, *Request to be selected as Payee*) for the child's Social Security funds, if receiving. Upon receipt of funds:
 - a. A *Notarized Designation of Client Money and Property Form (CF FSP 5222)* will be completed and notarized. A copy will be forwarded to the Children's Legal Services (CLS) Attorney to be filed with the Court and the original will be sent to the Client Trust Specialist to be filed in the client's Master File within 5 business days of receipt of funds.
 - b. A *Notice of Fee Assessment and Rights of Foster Child Form (CF 285D)* will be completed and

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a copy will be forwarded to the CLS Attorney to be filed with the Court.

3. Eligibility Assistant will forward Client Trust Specialist the following *Client Trust Checklist* documents to create the Master File:
 - a. Birth Certificate/Birth Verification;
 - b. Shelter Petition;
 - c. Shelter Order;
 - d. Child in Care Title IV-E Eligibility Verification Letter;
 - e. Admission and Movement Forms;
 - f. Notarized Designation of Client Money and Property;
 - g. Revenue Maximization Communication Form, if applicable;
 - h. Initial Expenditure Plan;
4. If it is determined by Social Security Administration (SSA) that the client will receive benefit payments, the Client Trust 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", or other Sub-account category, as applicable.
5. When a child comes into care, an initial *Master Trust Expenditure Plan* will be completed for SSI recipients to identify the child's current needs and will be again reviewed when *quarterly Master Trust Expenditure Plan* updates are due (i.e., September 30, December 31, March 31, and June 30).

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 the SSA.
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 SSA. The Eligibility Assistant will notify the Client Trust Specialist of this placement. The Eligibility Assistant is responsible for completing and providing a *Change of Events Form* to the SSA and forwarding a copy to the Client Trust Specialist for the client's Master File.

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

1. Eligibility Assistant will receive the *Authorization for Withdrawal of Funds Request Form* from the Dependency Case Manager (DCM) and review the submitted Request material to ensure the Form is completed accurately and in its entirety before forwarding the Form and backup documentation, if applicable, to the Client Trust Specialist for processing.

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- 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. An *Authorization for Withdrawal of Funds Request* must be submitted to the Eligibility Assistant and then forwarded to the Client Trust Specialist and notification will be sent back to the DCM 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:

Amount	Authorization
Request Under \$1000.00	Supervisor of Dependency Case Manager
Request \$1000.00 and Over and/or for Individual Property Items \$500.00 and Over	Program Manager & Out-of-Home Care Director

3. The Client Trust Specialist or Director of Finance and Accounting or designee of NWFHN will have final approval on all *Authorization for Withdrawal of Funds 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 Eligibility Assistant and audit for the following:
 - a. Ensures receipts are original.
 - b. Ensures receipts are for the items requested on the *Authorization for Withdrawal of Funds Request Form*.
 - c. Ensures receipts total the amount of the *Authorization for Withdrawal of Funds Request Form*. Any discrepancies will immediately be brought to the attention of the Eligibility Assistant, DCM Supervisor and DCM.
5. The Eligibility Assistant will submit all receipts to the Client Trust Specialist for final review and reconciliation and the Client Trust Specialist will ensure that the receipts are placed in the client's Master File.
6. 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 Account to ensure that balance does not exceed allowable limits and thereby make client ineligible for benefits.
2. The DCM will provide original receipts for purchase of *Authorization for Withdrawal of Funds Request* items. These are to be client-specific purchases for items listed on withdrawal request. The receipts will not exceed the total amount requested on the *Authorization for Withdrawal of Funds Request*.

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3. Ensure that all items purchased with money from the clients Master Trust Account are tagged/labeled appropriately. If the cost of an item is 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. The DCM will complete and return a *Client Trust Inventory Tracking Form* and place the required Inventory Tag(s) on the applicable item(s).
4. Ensure periodic Inventory checks are completed.
5. Ensure property is moved along with the client when placement changes occur.
6. Excess money from an *Authorization for Withdrawal of Funds 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 must be 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 NWFHN 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.
 - b. Receipts will equal the total amount of the request.
 - c. Excess funds will be deposited into the client's Master Trust Fund.

E. Eligibility Assistant Responsibilities.

1. Respond to the requests from DCF concerning the Client Trust Accounts. NWFHN is the authorized representative payee for benefits paid by the SSA and the client is the beneficiary.
2. Answer questions coming from DCMs, 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 the Client Trust Specialist.
 - b. Distribute client checks to appropriate DCMs.
 - c. Notify Dependency Case Managers of clients that have a balance of One Thousand Two Hundred Dollars (\$1,200.00) or more.
 - d. Scan and email correspondence from the SSA to DCMs.
4. Expenditure Plans.
 - a. Send reminders to DCMs when *Master Trust Expenditure Plans* are due quarterly (March 31, June 30, September 30 and December 31).
 - b. Act as a resource for expenditure planning.
5. Balance Reports. Provide Monthly Balance Reports (also called "Transaction Detail Reports" or "TDRs" to DCMs.
6. Change of Events – Representative Payee Reporting.
 - a. Report changes in a child's physical placement address to the Social Security Administration

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by completing a *Change of Events – Representative Payee Reporting Form*.

- b. A copy of the *Change of Events – Representative Payee Reporting Forms* will be sent to the Client Trust Specialist and filed in the child's Master File.
7. Judicial Reviews.
 - a. Periodically review JRSSR reports and complete *Notice of Fee Waiver and Rights of Foster Child Forms (CF 285D)* as needed.
 - b. A copy of the completed form will be sent to the assigned DCM and DCMS as well as CLS.
 - c. Each CF 285D will be accompanied by the most recent/up-to-date *Balance Report* and *Quarterly Expenditure Plan*, if applicable.
 8. Applications for Social Security Benefits.
 - a. Complete and submit *SSA-11-BK, Request to be selected as Payee* to the SSA for all children entering licensed care who are identified as currently receiving Social Security Benefits.
 - b. Submit all required forms and documentation required for Supplemental Security Income (SSI) and Retirement, Survivors, and Disability Insurance (RSDI).
 - i. Forms are to be provided to the assigned DCM or designated CMO staff for completion and returned to the designated Eligibility Assistant.
 - ii. Once the forms are received, Eligibility Assistant will submit all forms and documentation to the SSA and complete the application process as prescribed.
 - iii. Respond to requests from the SSA for additional required information and/or documentation.

F. Client Trust Specialist Responsibilities.

1. Respond to the requests from DCF concerning the Client Trust Accounts. NWFHN is the authorized Representative Payee for benefits paid by SSA and the Client is the Beneficiary.
2. Answer questions coming from 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 Client Trust Accountant.
 - b. Distribute client checks to Eligibility Assistant and Case Managers.
 - c. Notify Eligibility Assistant of clients that have a balance of One Thousand Two Hundred Dollars (\$1,200.00) or more.
 - d. Scan and email correspondence from SSA to Eligibility Assistant.
4. Master Trust Expenditure Plans.
 - c. Send reminder to Eligibility Assistant when *Master Trust Expenditure Plans* are due quarterly (March 31, June 30, September 30 and December 31).
 - d. Act as a resource for expenditure planning.
5. Once the bank accounts are reconciled with the bank statement by the Client Trust Accountant, a copy of the client's balances will be sent to the Eligibility Assistant.
6. Representative Payee Reports. Complete and submit Representative Payee Reports to the Social

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Security Administration, as requested.

7. Request for Social Security Returns. Social Security returns must be identified with the reason for return including, but not limited to:
 - a. Over the limit;
 - b. Returning conserved funds due to closing account;
 - c. Child placed in a SIPP placement or other type of placement.

G. Client Trust Accountant Responsibilities.

1. Room and Board Disbursement to the State.
 - a. Room and board disbursement will be completed and issued to DCF within sixty (60) days of the completion of the reconciliation.
 - b. A copy of all backup will be mailed to DCF at the address on the invoice. The original will be maintained in electronic format on the NWFHN secure network drive.
2. Reconciling Accounts.
 - a. When the bank statements are received, the Client Trust Accountant will begin the process of reconciliation between Client Trust Accounts and the Bank.
 - i. The Client Trust Accountant will only reconcile after all deposits, room and board and interest has been entered.
 - ii. The Client Trust Specialist will only complete the reconciliation for each account after receipt of the accounting system reconciliation.
 - b. Reconciliation for both regular and dedicated accounts will be provided to the Director of Finance and Accounting or designee for approval.
 - i. Upon receipt of the approved reconciliation, the Client Trust Accountant will forward a copy of all backup to DCF when requested.
 - c. The Client Trust Accountant is responsible for reconciling both current needs and dedicated bank accounts.