

SAN GABRIEL/POMONA REGIONAL CENTER

GUIDELINES FOR INDEPENDENT LIVING SERVICE (ILS) AND SUPPORTED LIVING (SLS) PROVIDERS

MONEY MANAGEMENT SERVICES

The San Gabriel/Pomona Regional Center (SG/PRC) “Money Management Guidelines” for Independent Living and Supported Living Service Providers are primarily derived from the duties associated with SG/PRC being the representative payee for many of the clients receiving independent or supported living services (ILS or SLS), as required by the Social Security Administration.

For those clients who do not receive Social Security benefits and the regional center has asked the ILS/SLS provider to help with the management of Purchase of Services (POS) funds sent to cover rent and other living expenses, the same principles consistent with safeguarding and accounting Social Security benefits will be applied.

The decision to ask a vendor to help with money management is based on an agreement of the client’s planning team and that agreement should be documented in the client’s Individual Program Plan (IPP). Any exceptions to the Guidelines contained in this document should be included in the client’s IPP.

The following are typical service requirements for vendors providing any of the services listed above:

1. Budget development and management for individual clients:
 - a. Develop monthly budget with the client’s participation.
 - b. Assist the client in reducing expenditures by applying for discounted utility rates (such as CARE/FERA and HEAP), Section 8 Housing, and In-Home Support Services (IHSS), as appropriate.
 - c. Assure that the client avoids late charges, by assisting the client to pay bills on time.
 - d. Work with the client to avoid debt or develop a debt reduction plan.
 - e. Manage client funds at or below the cash resource limit for maintenance of eligible benefits. Note that the total amount for all cash resources (work wages, checking, savings, cash on hand maintained by the vendor and SG/PRC trust funds) cannot exceed \$2000.00 at any time.
 - f. Notify SG/PRC Service Coordinator assigned to the client as soon as it is determined that the client has insufficient funds to meet living expenses.

2. Establish banking/fiduciary relationships, if applicable:
 - a. Establish an individual account for each client eligible to open a checking account, if the client can afford to have an account. As most banks require a \$200 minimum balance, the clients most likely to afford an account would be those who are working or are the recipient of multiple benefits.

- b. Work with banks or other financial institution to minimize or waive bank fees and maximize interest earned.
 - c. Reconcile bank account information with individual client ledgers on a monthly basis and report to SG/PRC's CBC Unit by sending a copy of the bank statement.
 - d. Assure that client funds are kept separate from any business account associated with your program/services. Cash resources of clients must never be commingled with business accounts or program funds. Plus the funds of one client must be kept separate from another client's funds.
 - e. Note: If the client is his or her own payee, there can be a direct deposit of SSI funds into that client's account. Direct deposit can reduce or eliminate bank fees. If SG/PRC is the representative payee, direct deposit into a client's account is not allowed.
3. Secure funds for clients who do not have banking relationships.
- a. While a bank account is always preferable, if a client cannot have a bank account, the vendor shall maintain the client funds in a secured lock-box or safe.
4. Accounting of client receipts, disbursements, bank records, etc.
- a. Maintain receipts and other documents to support transactions for a minimum of five years.
 - b. Maintain individual client ledgers detailing all transactions including income, purchases, receipts, disbursements, and interest.
 - c. Perform monthly bank reconciliations with each individual client with an account.
5. Maintain individual file for each client.
- a. File should include, but is not limited to, documentation substantiating all disbursements (invoices, etc.), receipts, work earnings, SSI, SSA benefits, gifts, and letters from benefit agencies.
 - b. Maintain all original client records, including as a minimum the receipts, disbursements, and bank records indicated above, for a minimum of five (5) years, per Title 17 Section 50605.
6. Maintain proof of payment/receipts.
- a. For vendors assisting clients with rent and utility payments (either vendored as service code 101 - Housing Services or managing client's own benefit money), obtain and maintain a receipt signed by the landlord/property management company or a printed receipt on the apartment's/property management's form/letterhead for each month rent is paid. If receipts from the landlord/property management company are not available, receipt book forms need to be completed, including the signature of the landlord with the date of the transaction. Also obtain and maintain proof of payment for utilities.
 - b. Submit copies of proof of payment (as described above) each month to SG/PRC's CBC Unit.
 - c. For those vendors assisting clients with living expenses (either vendored as service code 034 - Money Management or managing the client's own funds), obtain and maintain receipts for purchases and enter details into the individual client ledger. Of particular importance are receipts for major purchases. Assist the client in maintaining each

warranty for major purchases, as may be required for an extended warranty.

- d. Record cash disbursements to clients (up to the limit determined by the Individual Program Plan (IPP) planning team and documented on the Cash Handling Form [Form 820 ILS]) in the individual client ledger. For an example, if there has been a cash withdrawal from the client's checking account for \$100 cash and an \$80 item was purchased, there must be an accounting of the remaining \$20 – either given to the client as cash where the client has signed for the cash or the money returned to the client's account.

7. Develop administrative oversight.

- a. Establish detailed written procedures for all processes listed above.
- b. Respond to all audits performed by SG/PRC and other benefit agencies.
- d. Implement and follow conscientious internal controls.
- e. Develop procedures to safeguard client assets.

8. Reporting Responsibilities

- a. Send copies of client's wages to SG/PRC Client Benefits Coordination (CBC) Unit monthly, if SG/PRC is the representative payee
- b. Send copies of client's wages to the Social Security Administration if the client is his or her own payee.
- c. Report all other sources of income to SG/PRC CBC Unit, such as tax refunds, unemployment benefits, spouse's income or benefits, or benefits awarded to the child or children of the client living with the client.
- d. Report changes in living arrangements or household that would affect the client's expenses. This includes reporting when a roommate has moved in to share the costs or if a roommate moved out. Include a copy of the lease agreements that reflect the changes.

9. Maintain appropriate insurance.

- a. All vendors are required to maintain current Commercial General Liability (if they have a physical site where clients may be present), Workers' Compensation, Professional Liability Insurance (for Social Service Professionals), including coverage for Sexual Abuse and Molestation.
- b. In addition to the above-listed insurance policies, the vendor providing money management services is to provide Crime Insurance as part of their liability insurance package, to cover losses due to employee theft of client money and/or property.
- c. Provide current copies of insurance policies to SG/PRC.