

Agency Service Coordination Manual

6.4 Management of Personal Funds

Background

All individuals in receipt of Community Living disABILITY Services (CLDS) are encouraged to manage and make decisions about their personal finances to the best of their ability. Opportunities for guidance, education and support to assist individuals to gain skills and increase independence with financial management should be considered wherever possible.

For individuals who receive case management as part of the Agency Service Coordination Pilot project, agencies are responsible for facilitating the Personal Financial Planning process as a critical component of the person-centered planning. Assistance will be provided in the best interest of the individual, in the least restrictive and least intrusive manner possible, where an individual's choice is promoted to the greatest extent possible. The agency is also designated as having the primary responsibility and accountability in the management of an individual's funds.

Personal financial planning is required when an individual receives assistance with management of their personal funds from the operator or staff of a Residential Care Facility funded through CLDS. To facilitate planning, a Personal Financial Plan must be developed to describe an individual's financial goals, how those goals will be achieved and the support needed to achieve those goals. For CLDS participants who are independent with their finances, a formal personal financial plan is optional.

This document is to be used in conjunction with the CLDS Management of Personal Funds Policy. All standards, requirements and best practices set forth therein continue to apply for all individuals receiving supports from CLDS. This procedure clarifies the amended roles and responsibilities during the personal financial planning process for individuals receiving case management through the Agency Service Coordination Pilot project.

*****Please note that there are separate requirements for individuals who are supported by a pilot agency who have the Public Guardian and Trustee (PGT) appointed as their Substitute Decision Maker (SDM) for property decisions. The processes for these individuals are also described in this procedure.**

Process

Personal Financial Planning

- The agency providing case management is responsible for all elements of the Personal Financial Planning process, as defined in the Management of Personal Funds Policy.

- The agency designate works together with the individual to identify the members of the support network who should be involved in the process.
- A Personal Financial Plan must identify the areas where the individual requires supports and the person(s) responsible to provide those supports. An individual's goals, wishes and dreams are central to the process. Opportunities for guidance, education and support to assist individuals to gain skills with financial management should be carefully considered, and worked into the plan wherever possible.
 - Note that on the Personal Financial Plan form, the section that refers to CSW may also be used by the agency designate ONLY for individuals receiving case management through the Agency Service Coordination Pilot project, who do not have PGT involvement.
- For individuals who do not reside in a Residential Care Facility and who are independent with their finances, a formal personal financial plan is optional.
- The agency designate will maintain the most recent Personal Financial Plan on the individual's file. Copies of the plan are distributed to the planning team, and additional members of the support network where appropriate.
 - Personal Financial Plans from previous years will be maintained on the individual's hardcopy file as per the agency's internal storage and archival policies.
- Where an SDM (other than the PGT) for property has been appointed, the SDM is responsible to review and approve the plan. If an SDM suggests changes to the plan, the agency designate will ensure the necessary changes are made within 10 business days.
- Where there are concerns regarding an individual's ability to manage their personal funds or vulnerability to financial exploitation, ongoing supports can be developed as part of the planning process. This can include the use of EIA processes, restrictions on personal bank accounts or an application for a substitute decision maker as a last resort.
- If an individual is unable to make decisions about their finances with or without the assistance of their support network, the agency designate, in collaboration with the support network, shall pursue an application for an SDM for property (under the VPA) or Committee (under The Mental Health Act) as described in the SDM Applications section in this manual.

For Individuals with the PGT Appointed as SDM for Property

- The agency designate is responsible for planning and facilitating the Personal Financial Planning process, including inviting the appropriate members of the support network to be involved. The agency designate will inform the assigned CSW of any planning meetings. The CSW may participate at their discretion.

- The completed Personal Financial Plan document will be sent to the CSW for review and signature. The CSW will provide feedback and/or approval within 10 business days of receiving the plan.
- The CSW will then submit to the assigned Adult Services Administrator for further review and final approval. If the PGT requests changes to be made, they will communicate these changes to the CSW using the Variance to Financial Plan Form within 10 business days of receiving the plan.
- Where the PGT has made a variance to the plan, the agency designate will ensure the necessary changes are made and communicated to the individual and support network within 10 business days.

Monitoring and Evaluation

- The agency providing case management will ensure that a review of financial records occur on a monthly basis. The monthly review and audit of an individual's financial records, in addition to the overall oversight of personal funds, is the responsibility of a designated program manager within the agency who does not work directly in the home or provide direct support with financial management. Wherever possible, the monthly review should be completed by staff without access to the individual's personal accounts.
- All agency documentation involving an individual's personal finances may be subject to review through the quality assurance/audit process.
- The agency staff/care provider will cooperate with reviews and provide access to the individual's financial records upon the request of the SSN, CSW or anyone else authorized to conduct audits/reviews (e.g., Residential Care Licensing or legally appointed authority responsible for finances).
- During regular annual reviews, the Residential Care Licensing case manager will review a three month sampling of the yearly financial records where an individual's personal funds are being managed by the operator or staff of a Residential Care Facility, to ensure that these funds are managed in compliance with policies and standards. In addition, a Residential Care Licensing case manager may assist with any difficulties encountered with financial management and recording.

Review and Follow-Up

- The agency designate will schedule a review of the individual's Personal Financial Plan at minimum once every 18 months or more frequently as needed, when there is a change in the individual's circumstances (e.g., the individual has moved, the individual's income has changed or the individual's support needs have changed).
- A review of the Personal Financial Plan will confirm that:

- a. the Personal Financial Plan is in accordance with the individual's current best interests, needs and wishes;
 - b. any changes regarding the individual's finances have been updated in the individual's Personal Financial Plan (e.g., financial information, personal possessions list, objectives, individual's skill level, assistance required by the individual, designation of responsibilities);
 - c. any adjustments or corrective actions are implemented immediately; and
 - d. the service provider/staff continues to manage the individual's personal funds in accordance with standards.
- Where circumstances warrant, the agency designate shall report:
 - a. matters/issues of significance to the SSN or CSW and the Protection Team or Regional program manager; and
 - b. matters/issues of significance to any other authorities where involved (e.g., Residential Care Licensing case manager, PGT or other legally appointed authority responsible for property).

Investigations

- Where a further examination of financial management and recordkeeping procedures is required in licensed Residential Care Facilities, the Protection team or RNS program manager has the ultimate responsibility to coordinate and assume the lead role in allegation reviews and to involve other authorities as necessary (e.g., PGT, police, RCMP).
- Any concern regarding financial abuse or exploitation are to be reported to the SSN or CSW and Protection team or RNS program manager within 24 hours, as detailed in the Protection from Abuse and Neglect section of this manual. These situations must also be reported to the SDM.
- Allegation reviews will be completed by the Protection Team or RNS program manager within 10 working days in order to determine the follow-up that is required by the protection team or regional program manager, Residential Care Licensing and if a protection investigation is required.
- The Residential Care Licensing case manager and/or SSN or CSW will support the process and assume a consultative role, on request, where investigations involve approved Residential Care Facilities. (Refer to Part L, Appendix C of the Residential Care Licensing Manual for more detailed information on investigations).
- The Protection team or Regional Program manager may consult with the local law enforcement authority to establish whether a criminal investigation will be

conducted.

Standards

Note: the following standards indicated in **bold** represent new standards that apply to the Management of Personal Funds as part of the Service Coordination Pilot Project. Standards that are not indicated in bold are consistent with those defined in the CLDS Management of Funds Policy.

Financial Planning Standards

1. The **agency designate** ensures that a Personal Financial Plan is developed with any individual that receives assistance with the management of their personal funds.
2. **The agency designate will seek feedback and/or approval regarding the plan from their program manager (or comparable authority). The program manager will provide feedback and/or approval within 10 business days of receiving the plan. Approval of the plan is indicated by a manager's signature.**
3. **Where an SDM (other than the PGT) has been appointed for property decisions, the SDM will participate in the development of the plan, or be provided with a copy of the plan. The SDM will communicate any changes to the Personal Financial Plan to the agency designate within 10 business days of receiving the plan. The agency designate will revise the plan to reflect changes recommended by the SDM.**
4. **Where the PGT is appointed as the SDM for property, review and approval of the Personal Financial Plan is required by the CSW and the Adult Services Administrator.**
 - a. The CSW will provide feedback and/or approval within 10 business days of receiving the plan.
 - b. The PGT will communicate any changes to the Personal Financial Plan to the CSW using the Variance to Financial Plan Form, within 10 business days of receiving the plan.
 - c. Where the PGT has made a variance to the plan, the agency designate will advise the individual of any changes within 10 business days.
5. The **agency designate** ensures a review of an individual's Personal Financial Plan and the management of their finances is scheduled at minimum once every 18 months, or more frequently as needed when there is a change in the individual's circumstances (e.g., the individual has moved, the individual's income has changed).

6. Individuals' personal bank accounts are in their name where they are the only signer on the account. Any exceptions (i.e., co-signed or staff-signed accounts) must receive consent from the individual and be documented in the Personal Financial Plan. Staff-signed accounts must also be authorized by the legally appointed authority responsible for property. For more information on co-signed or staff-signed accounts, please refer to the Personal Bank Accounts - Best Practices section included in the CLDS Management of Personal Funds Policy.

Financial Management Standards

1. Assistance with the management of finances is only provided as described by the individual's Personal Financial Plan and according to standards and procedures contained in CLDS Management of Personal Funds Policy.
2. Individuals with co-signed or staff-signed accounts are supported to work towards greater independence. These steps are to be outlined in the Personal Financial Plan.
3. Every reasonable precaution is taken to protect the confidentiality and security of all personal financial records, monies and valuables (e.g., banking machine cards, gift cards, purchase vouchers) held in trust on behalf of the individual.
4. The individual's access to his/her personal bank account(s), monies and valuables is not restricted except where restrictions are in accordance with the individual's Personal Financial Plan and authorized by the legal authority appointed to make such financial decisions on the individual's behalf.
5. **Expenditures or withdrawals over \$200 require approval from the legal appointed authority or if not appointed, the designated manager within the agency (refer to Appendix B). Following the purchase of the approved expenditure, the proof of purchase must be attached to the signed Authorization for Expenditure form, and filed in the individual's personnel file.**
6. **For individuals who have the PGT assigned as SDM for property, expenditures or withdrawals over \$200 require approval from the CSW. Expenditures or withdrawals over \$500 require approval from the PGT.**
7. **The SDM may specify an amount other than \$200 that they must authorize. This amount is to be clearly indicated in the Personal Financial Plan.**
8. **For individuals who are independent in their finances, expenditures or withdrawals over \$800 require approval from the SSN if there is no legal appointed authority (refer to Appendix B). Following the purchase of the approved expenditure, the proof of purchase must be attached to**

the signed Authorization for Expenditure form, and filed in the individual's file.

- a. **In addition to expenditures over \$800, expenditures falling into the following categories must also be approved by the SSN:**
 - **Items that the individual cannot take with them if they move, including expenses that pay for improvements to the home, yard, vehicle, etc.;**
 - **Trips or getaways where staff expenses are paid for; and**
 - **Items purchased for the benefit of multiple residents and/or staff.**
 - b. **If the cumulative value of expenditures reaches \$1000 over a six month period, the list of expenditures is sent to the SSN for review and any additional AFEs will be sent to the SSN for approval.**
9. Individuals' personal financial records are readily available, accessible and organized.
 10. Individuals are provided timely support and access to their personal finances.
 11. Problems, concerns, incidents, allegations or suspicions of the misuse or misappropriation of the individual's finances and valuables are reported within 24 hours or the next working day to:
 - **the SSN or CSW**
 - **the Protection Team or RNS program manager**
 - the individual and the legally appointed authority responsible for property; and
 - the licensing authority involved if the individual resides in a Residential Care Facility (refer to "Residential Care Licensing Manual", Appendix B).
 12. If an individual moves or upon the individual's death, finances and valuables held in trust are released as specified by a will, if available.
 13. The personal possession list within the Personal Financial Plan is updated as changes occur.

Recordkeeping Standards

1. Separate financial transaction records are required for each individual receiving assistance with the management of their funds. Records are to be kept as follows:

- a. a copy of the receipt is attached to all signed Authorization for Expenditure (AFE) forms
 - b. The AFE and associated receipts will be kept with the monthly transactions according to receipt dates
 - c. where an individual has staff-signed accounts, a photocopy of the cash transaction record must be sent to the SDM, where appointed, on a monthly basis. The SDM does not require copies of the corresponding receipts, but may request receipts for specific expenditures.
2. If the actual cash-on-hand or the total of all bank balances is different from recorded balances on financial transaction records and no recordkeeping errors can be found to explain the discrepancy, the service provider must notify the following within 24 hours:
- a. the agency program manager or comparable authority
 - b. the individual;
 - c. the legal authority responsible for property, if appointed; and
 - d. Residential Care Licensing, if the individual resides in a Residential Care Facility.

6.4 Management of Personal Funds

Appendix A: Summary of Authorization and Approval

Individuals who are independent in their decision making, but who require assistance with finances	Individuals who have an SDM other than the PGT appointed for Property decisions	Individuals who have the PGT appointed as their SDM for Property decisions
Personal Financial Plan:		
Reviewed and approved by agency program manager.	Reviewed and approved by the SDM for Property	Reviewed and approved by the assigned CSW who will send to the Adult Services Administrator for final approval.
Single Expenditure/bank withdrawal over \$200 :		
Authorization for Expenditure form is reviewed and signed by agency program manager.	Authorization for Expenditure form is reviewed and signed by SDM.	Authorization for Expenditure form is reviewed and signed by CSW. For single expenditures/bank withdrawal over \$500, Authorization for Expenditure form is reviewed and signed by PGT.
Single expenditure/bank withdrawal over \$800 (or meets additional criteria as described in procedure):		
Authorization for Expenditure form is reviewed and signed by SSN.	Authorization for Expenditure form is reviewed and signed by SDM.	Authorization for Expenditure form is reviewed and signed by PGT.
EIA annual reviews and income tax returns:		
The agency designate ensures EIA annual reviews and income tax returns are completed and forwarded to the appropriate offices in a timely manner.	The SDM is responsible for completing the EIA annual reviews and income tax returns.	The PGT is responsible for completing the EIA annual reviews and income tax returns.