

COMMUNITY LIVING DURHAM NORTH

MONEY MANAGEMENT SUPPORTS

Policy No: B-6 (Service Delivery)

Effective Date: July 31, 2007

Last Revision/Review: Jan. 16, 2017

Rationale:

To ensure that best practices are adopted and that CLDN is fully accountable in every situation where it is necessary to assist supported persons in the management of their finances.

Policy Statement:

Staff involvement in the financial affairs of supported people shall be determined through a process of individualized, person-centred planning. Where such involvement is necessary, it will be governed by detailed procedures that set forth standards of documentation and monitoring.

In compliance with Reg. 299/10, whenever staff are involved in a person's financial affairs, his/her bank accounts and internal spending ledgers will be audited, annually, by management or administrative personnel not directly involved in supporting the individual.

The results of these ongoing annual audits will be reported directly to the Board of Directors.

Any restrictions on a person's access to his/her own funds shall be reviewed by the Rights Committee.

Approved by: _____ Date: _____
for the Board of Directors

COMMUNITY LIVING DURHAM NORTH
MONEY MANAGEMENT SUPPORTS

Procedure No: B-6-1

Routine Assistance with Cash Management

Effective Date: June 30, 2011

Last Revision/Review: June 29, 2018

- Most people in receipt of residential support need some degree of assistance to manage their money. The type and level of assistance required must be clearly documented in his/her Support Plan. On the *Support Plan Agreement* (form B-25), which is signed off annually by the person, his family (if appropriate) and the agency, the person is asked to consent to the kind of staff involvement necessary to properly implement the plan.
- Family members will be encouraged to assist but in the majority of cases CLDN will have to play a role in helping vulnerable people manage their money.
- Under the “Personal Financial” section of the AIMS database, most supported people will have multiple ledgers. One will reflect the person’s bank account whether that is an account in an actual chartered bank or an internal CLDN account (see below). A second ledger will track Cash on Hand (i.e. money withdrawn from the bank and kept in the person’s wallet or in a locked cash box within the program, depending on his/her skill level).
- Additional accounts will be created in AIMS when people receive a gift card, even a Tim Horton’s gift card, and entries in the Withdrawal column will track the card’s progress down to zero. When inputting gift cards onto AIMS staff will include the name of the store the gift card is for, the entire gift card number as well as the PIN number (if applicable) under the “Account Names” section. When the person is supported at two locations, staff will also include the location where the gift card is kept. Staff will take a photocopy of the gift card, front and back, and place this into the person’s spending money binder, along with the gift card’s ledger.
- Withdrawals from the bank (to be deposited in Cash on Hand) will be made according to a schedule dictated by the person’s resources and spending habits and will be limited to small amounts from \$20 to \$60.
- If the person is able to effectively handle this amount of cash, the withdrawal itself will be treated and noted as an expenditure. The person will be asked to sign a chit acknowledging receipt of these funds and staff will retain the signed form as a kind of receipt. There will be no further expectation that the person collect receipts at the point of ultimate expenditure and therefore there will be no Cash on Hand account in AIMS.
- However, if assistance with even minimal cash is required, money withdrawn from the bank will be kept in a locked cash box within the program. In this case, the AIMS spending ledger will document all transactions in and out of the cash box and receipts

will be collected for all expenditures. Variances exceeding \$2.00, between the record book balance and actual cash on hand will be brought to the attention of the Program Manager.

- If a person in need of money management supports receives a monetary gift, e.g. from family or friends, funds exceeding \$50.00 will be deposited into the person's bank account for safe keeping. Smaller cash gifts must be entered into the person's spending ledger and secured in the locked cash box.
- Staff must complete a *balance check* on spending ledgers, using AIMS, before assisting people to make an expenditure using cash or gift cards. If a variance is found, it is to be reported as above.
- The Program Manager will audit each person's ledger(s) on a monthly basis. Any irregularity will be immediately reported to the Program Director.
- Our Day Programs and Respite Programs constitute exceptions. Each one of them supports a large number of people and it is not feasible for their managers to perform dozens of audits on a monthly basis. Also, the people using these services are typically bringing very modest amounts of spending money; in the case of the Respite programs money that is generally intended to last for only a few days.
- In the case of these programs, on-site Team Leaders will perform the audits, enlisting the help of designated Support Workers, if necessary. Variances of less than \$5.00 between AIMS and actual cash on hand will be corrected by the Team Leader, either by diagnosing and fixing the problem, or by writing off the money and adjusting AIMS downward.
- Where an individual receives support from CLDN Day Program and/or Respite services, all money received from the family will be documented on AIMS. In the case of respite, all receipts are sent home along with all unspent money. In the case of the day program, all receipts are kept in the program location and are available for the family to review.
- In these specific programs, variances of \$5.00 or more will be brought to the manager's attention, and if no solution is at hand the problem will generally be corrected at CLDN's expense.

Procedure No: B-6-2
Banking

Effective Date: June 30, 2011
Last Revision/Review: Oct. 17, 2018

- People who have the ability to safeguard their own funds; who are not vulnerable at the teller's wicket or while withdrawing money at an ATM, may choose to hold an account at a chartered bank or credit union.
- Where this is the case, the person will be encouraged to select an account that offers the bound pass book option.

- Also, in order that all money going into and coming out of the person's account can be "seen," the person will be encouraged to deposit 100% of all cheques (e.g. the monthly ODSP cheque) with any needed withdrawal being made as a separate transaction.
- Increasingly, however, people supported by CLDN use the agency's internal banking system which has been set up for two reasons:
 - a. people with severe challenges have difficulty opening truly individualized and secure accounts at registered Canadian banks. In the past, it has sometimes been necessary for a senior staff person to sign on jointly and this compromises the person's ownership of his own money while putting the staff member in a vulnerable position.
 - b. if a person needs assistance to handle his money as it comes across the counter or out of the ATM, it is simply not possible for an agency of this size to properly supervise the people who would be charged with providing this assistance; and it would put them in a vulnerable position.
- Each person enrolled in our internal financial service will have a single account number within CLDN's chart of accounts. It will be a restricted, in trust account held completely separate from CLDN's operational accounts and from other restricted accounts.
- These restricted, in trust accounts will be created and maintained by CLDN's Finance Department and our accounting software will have the capacity to generate full and accurate records.
- Incoming funds, from ODSP, the Public Guardian or a federal agency, whether by cheque or electronic transfer, will be deposited by Finance into the person's individual internal account.
- When the person requires spending money, his or her support staff will request that Finance transfer money from his/her personal account to an associated account, which is linked to an ATM card, and which serves as a sort of drop box. The staff, and preferably the supported person, will then pick up the ATM card, from Finance, and withdraw the funds from an RBC ATM. The ATM card will then be promptly returned to Finance.
- All transactions will be processed through the agency's accounting software and will be subject to regular internal and third party audits on the same schedule as we audit the spending ledgers and bank accounts of supported people who do use regular chartered banks.
- Although there is no charge for the services provided CLDN will pay interest calculated in the following manner: The account on which interest is paid contains MCSS subsidy dollars and funds belonging to people supported. If 75% of our bank balance belongs to supported people, that percentage of interest paid will be passed on to them. Within the total that belongs to supported people, each person's share will be calculated as a per cent of the whole such that someone with \$10,000 in their account will receive twice as much interest as someone with \$5,000. These calculations will be made quarterly and interest will be disbursed quarterly.

- People holding an internal CLDN account, and/or their families, will be asked to complete a Beneficiary Designation form instructing the agency how it should dispose of their assets in the event of death. In the absence of family, people should be assisted to make informed decisions that are meaningful to them. A person could name a friend who is, or is not, supported by CLDN. He/she might designate the Animal Shelter where they work or volunteer. CLDN is also a registered charity and could be designated. However, given that the person will likely reach their decision with some measure of assistance provided by a CLDN employee or staff team, there is an apparent conflict of interest. Therefore, when CLDN is named as a beneficiary, the agency will seek out an appropriate third party (e.g. a regional Community Service Worker, a former Home Provider, etc.) to review and approve the decision making process.
- Also, CLDN can receive the funds in one two ways. The person can simply designate the agency, in which case future spending or investment decisions will be left to its Board of Directors. Or, the person can stipulate that the money be spent in a certain way, perhaps on the particular home where he or she lives in, or in the interests of his/her roommates. Employees helping a person to complete a Beneficiary Designation form need to be alert to these different options.
- Designating beneficiaries should also be a consideration for people who continue to use commercial banks. A good first step for them and/or their families is a conversation with a bank manager. In the absence of a will and a legally appointed executor, banks may initially refuse to release funds to anyone, even siblings, on the grounds that they cannot know how many siblings there are, or the deceased person's wishes regarding how to distribute assets amongst them. It helps to provide the bank with a Death Certificate and to offer to sign an Indemnity form.

Procedure No: B-6-3

**Income Maintenance Programs; “Rent”
and “Pin Money”**

Effective Date: June 30, 2011

Last Revision/Review: Jan. 17, 2017

- Adults not yet 65 years old receive a monthly disability allowance from the province (Ontario Disability Support Program) unless a private income or large asset base renders them ineligible.
- At the age of 65 the person's file is transferred to the federal government and the person begins to receive a roughly equivalent amount that is made up of two distinct components - Old Age Security and Guaranteed Income Supplement (GAINS). However, this is not an automatic process. The Team Leader must apply for the transfer in a timely manner. Indeed, it can take up to one year to effect this transition.
- In either case, and in accordance with provincial legislation, people residing in group homes will pay close to 90% of this income to the agency, as room and board; the balance is retained as “pin” money.
- People in residential services, or those acting on their behalf, are asked to sign a Pre-Authorized Debit Payment (PAD) form authorizing the agency to automatically withdraw this monthly charge from their account. Pre-authorized debit eliminates paperwork and

the need for reminders; it ensures timely payment and also allows for enhanced security. Signed forms are maintained on file. PAD is not mandatory; the person or advocate may decline at the outset or at any time thereafter.

- CLDN invoices people on the 1st day of the current month but it recognizes that Income Maintenance (ODSP) cheques, for a given month, are received at the end of that month. Therefore, the automatic withdrawal is made on the 10th of the following month.
- It is a key responsibility of every Team Leader to assist people to safeguard their eligibility for continuing income maintenance support. This involves the submission of regular reports to ODSP concerning any income the person may have. It also involves monitoring the person's bank balance. At \$5,000 the person loses his eligibility for ongoing payments.

Procedure No: B-6-4
Trusteeship

Effective Date: July 31, 2007
Last Revision/Review: May 1, 2013

- Formal trusteeship might be legally conferred upon a family member, or it might be exercised by the Public Trustee, but no employee of CLDN will act as legal trustee on behalf of a supported person.
- However, having met an individual, the ODSP office will sometimes request that someone act as trustee only with respect to that person's monthly ODSP income.
- In this case, the request will first be passed along to appropriate family members. Failing that, the CEO may accept this Income Trusteeship and ODSP will have him or her sign off on documents that describe his/her duties and responsibilities. Note that this Income Trusteeship is not to be confused with legal trusteeship over all aspects of a person's finances.

Procedure No: B-6-5
Who Pays for What

Effective Date: June 30, 2011
Last Revision/Review: Jan. 6/16

- In addition to support, group homes provide room and board.
- Food, communal furnishings, the upkeep of the home and most day to day essentials are the responsibility of the group home.
- The agency's budget also includes a *Personal Needs* line which is intended to cover an array of personal expenditures including some clothing, certain kinds of transportation, personal toiletries, over the counter medications, dispensing fees and the like.

- The person's own funds, withdrawn from his accumulated pin money, are for discretionary incidentals: admission tickets and refreshments while in the community, cigarettes, gifts for friends or family, discretionary travel costs, vacation accommodations or summer camp. People also need to use their own money for things like clothing when the agency's *Personal Needs* line has been maxed out.
- The line between what is provided and what is discretionary is subject to some blurring as people exercise their right to make choices. Food is provided; but the decision to order pizza on Friday night is more appropriately self-funded. Most furnishings are provided; but an upscale name brand, or a bedroom TV, should be purchased by the individual who desires the item.
- Moreover, the agency's overall fiscal position is an important consideration. The *Personal Needs* line contains, in a typical year, only \$750 to \$1,000 per person (i.e. per group home or Family Home resident). Therefore, while an article of clothing is certainly a legitimate agency expenditure, CLDN must control its costs and not all legitimate Purchase Requests will be approved. Consult your Program Manager if you are unclear whether a particular purchase should be made by the program or the person. And, see below for detailed bill-back procedures concerning discretionary support costs and travel costs.
- In the SIL program, people pay rent to their own landlord and they cover their own household expenditures. Those who share accommodations face the reality of having to sometimes pool their resources to make necessary purchases. In such cases, support staff will assist them to keep accurate records so that suitable and fair arrangements can be made when roommates go their separate ways.
- In group homes, the pooling of resources should not take place. A bedroom TV would obviously be purchased by the occupant of the bedroom; if an appliance or furniture for a common area of the house is required, then it should be provided by the agency.

Procedure No: B-6-6

The Recovery of Discretionary Travel Costs

Effective Date: June 30, 2011

Last Revision/Review: Sep.15, 2013

- When practical, staff should support people to use public transportation. Because this is often impractical, the agency owns and operates several vehicles, and it reimburses employees who use their private vehicles, in order to help people navigate their communities. People supported residentially, excluding several people in SIL, use these resources on a very regular basis and are charged a flat monthly rate of \$40. This amount is a token contribution; it is not full payment for services rendered.
- Supported people are billed for transportation in two other circumstances:

- They use an agency vehicle to commute to one of our Adult Community Support Programs;
- They choose to travel beyond their local community.
- The local community will be defined as Durham Region. For Janetville, Mariposa, Lorne and Concession 13, Durham Region will be interpreted notionally, so as to include Lindsay or Georgina, for example, but not Ajax or Bowmanville.
- When people opt for discretionary travel; i.e. travel beyond Durham Region, they will be billed on a per kilometer basis. Managers are required to review the monthly Van Logs and Expense Claims and must notify Finance of any invoices that need to be prepared, specifying the person, the kilometres and the amount.
- Most discretionary trips are for shopping and recreation. However, if a person who could have a dentist in Port Perry or Uxbridge prefers to have one in Toronto or Newmarket, then dental appointments will involve discretionary travel. Specialist medical appointments that are out of region will not be considered discretionary, and the costs will not be recovered, if there is no such specialist practicing in Durham Region.
- Payments, whether made by cheque or pre-authorized debit, are coded as a negative expenditure to the appropriate program's Vehicle Recovery line.
- Unrelated to the question of payment, staff are required to obtain prior approval for any transportation that could be considered unnecessary, even if it's within Durham Region. Travelling to Whitby or Ajax to purchase something that is available in the Port Perry - Uxbridge area needs prior approval. Going to a park in Oshawa for a picnic needs prior approval because there are parks in Port Perry and Uxbridge. Likewise, "going driving," even with a supported person who enjoys this activity, requires prior approval.

Procedure No: B-6-7

Effective Date: October 17, 2008

**Payments to Supported Persons made through
Community Support Programs**

Last Revision/Review: Jan. 16, 2017

- CLDN closed its Sheltered Workshop in the early 90's and has long recognized that the ideal outcome of all job development activity is the placement of people in real jobs at minimum wage or better.
- An acceptable if not ideal alternative is achieved when CLDN itself becomes the employer of supported people doing necessary work. In-house job opportunities do evolve over time and one example is unsupervised work at the agency's Coffee Kiosk. In all such cases at least minimum wage will be paid and there will be an open competition amongst qualified people.

- Such employees will be an integral part of the agency's payroll; CRA rules and regulations will be fully observed, WSIB payments will be made, etc.
- When actual employment is not attainable, or perhaps not practical, some people may choose to participate in a social enterprise that generates income but not profit. Current examples are a can-crushing enterprise and a shared paper route. This participation is always part time and casual, merely one element of an individual's chosen meaningful day. All of the money generated is immediately shared out among the participants; it does not touch an agency account, there are no hold-backs to cover agency costs, and the participants are obviously not enrolled on CLDN's payroll.
- People who receive ODSP payments are required to report a statement of earnings on a monthly basis. Statements are required by the 7th day of the month following the month in question. All supported people with earnings whether it comes via a third party employer or CLDN's payroll must report to ODSP.
- And, in January of each year, for tax purposes, Team Leaders will ensure that a *Statement of Earnings* is issued for each person who had employment income during the previous calendar year.

Procedure No: B-6-8
Recovery of Cable Costs

Effective Date: June 30, 2011

- People residing in a group home may choose to access television channels not available as part of the basic package available in their area.
- In this case, the entire cost, beyond the cost of the basic package, will be paid by the supported people.
- CLDN invoices on a monthly basis and people typically pay via pre-authorized debit.

Procedure No: B-6-9
Personal Inventories

Effective Date: July 2, 2009
 Last Revision/Review: June 15, 2017

- It is an expectation of the Ministry that each person in receipt of residential service will maintain, or have maintained for him, an inventory of significant personal possessions. MCSS Compliance Officers will typically ask to see these inventories during their visit to a particular group home.
- Normally, for practical reasons, we would not inventory items valued at less than \$500 but, in the case of supported people, the material value is of less importance than the value that the person places upon the item.

- An individual's personal inventory is located in his/her electronic file in the AIMS database.
- The Inventory includes columns for standard information such as the item's Description, Manufacturer, Purchase Date, Purchase Price, Model No., etc.
- It is the responsibility of the Team Leader in each location to ensure that the inventory list is kept current and that new items are entered onto the list as they are acquired.
- Prior to disposal of any personal assets, supported people and their families will be consulted. The disposal of any personal item must be recorded in the AIMS personal inventory noting the disposal date and the disposition – i.e. the item was given to family or disposed of in some other way.

Approved by: _____ Date: _____
CEO