MVACL

Supporting Persons supported with their Finances

### **POLICY**

Where a person receiving supports has requested assistance with the management of their day- to-day finances or the assistance is identified in the person’s individual support plan a separate book of accounts and financial records is prepared and maintained for each person with a developmental disability who receives assistance with the management of their day-to-day finances.

## ANNUAL FINANCIAL PLAN

Each person receiving residential support from MVACL will complete, with assistance as needed, an Annual Financial Plan. It is recommended that the plan is completed when their income tax return is prepared. Follow-up or direction required from the review will be incorporated in the implementation of the individual's personal support plan.

## ONTARIO DISABILITY SUPPORT PROGRAM

Assistance in regards to maintenance of their finances is available to person’s supported within the residential program and is developed according to their individual needs. An assessment of their support needs and their desire for support determines the quantity and intensity of support they will receive. Persons supported receiving Community Participation Supports or Independent Living Supports receive assistance to maintain their finances as identified in their personal plan of support.

## Direct Deposit

For PerDiem (rent) requirements each individual will be encouraged to apply for direct deposit as this is a much more effective way to manage the account. DSS will assist the individual in making application for direct deposit

## Eligibility Reviews

Anyone involved in paid work through the Employment Support Program will receive assistance in completing and submitting all necessary updated forms, applications and reviews in regards to their O.D.S.P. eligibility from their Support Worker.

Residential support staff will provide all other persons supported with support to complete the annual review forms in regards to their O.D.S.P. eligibility, (unless family member or significant other prefers to do it.)

## Application for appointment of PG&T Trustee

Application for appointment of PG&T Trustee will be pursued when individual makes a request for the assistance of a signing trustee.

Or when; through assessing and reviewing O.D.S.P. correspondence with the individual it is determined and agreed upon by at least three of the following persons supported that the individual is unable to understand the information and a signing trustee is necessary, self (if possible), parent, significant other, O.D.S.P. worker. In all situations the individual has full authority to consent, or not, to the use of a trustee for his/her O.D.S.P. assistance.

## APPOINTMENT OF TRUSTEE

## Procedure

The following information will be reviewed and translated into simple language with each person on a individual basis with their DSS and/or Manager.

* Personal Information Update Form
* Application for Assistance
* Rights and Responsibilities
* Consent to Disclose and Verify Information

If it is determined that the individual is unable to adequately understand the information If the individual’s family member and/or significant other are the most logical person to assume this role this will be pursued by staff if interest is shown and the individual is in agreement. The Executive Director and/or the Manager will provide family members with information to access PG&T to be fully informed of the responsibilities involved when assuming this role.

Once a year the support team must review the recommendation to continue or discontinue the trustee arrangement or review the need to possibly acquire a trustee. This will be identified in the Annual Financial Plan that is to be completed each year and kept with the ISP.

## Responsibilities of the Trustee

The trustee must ensure that he/she seeks out, receives and documents advice where:-

* issues are not addressed in the guidelines or the guidance is unclear
* issues pose an ethical or moral dilemma
* issues may give rise to a real or perceived conflict of interest

The trustee will be available to ensure the required information is sent in to O.D.S.P. to ensure there is no disruption in benefits.

The trustee will be responsible for overseeing the staff support that provides assistance with his/her financial transactions.

The trustee will be required to make themselves available for required signatures.

**Opening up and account:**

Both the Supported Person and the Supported Decision Maker if required are to visit a branch together to open the account and present a copy of the signed “letter of direction

***MVACL*** staff should contact ***Bank*** with the information such as the client name and make an appointment at the branch.

The individual and the Supported Decision Maker must present two (2) pieces of identification.

**Changing the Caregiver on the account**

When there is a change with the Supported Decision Maker on the individual’s account, MVACL must provide the bank with a “Letter of Direction removing the existing SDM and giving notice of the new SDM before any account maintenance can be performed. Only the new SDM needs to attend the branch and present two (2) forms of identification as mentioned above.

## CO-SIGNED BANK ACCOUNTS *NO LONGER BEING USED*

### **ACCESS**

Bank accounts will be established for persons supported at a bank that is reasonably close to the group home. All person supported bank accounts statements will be mailed to MVACL Administration office and distributed to the location of the person supported The Statements list all transactions and will have copies of the returned cheques. These Statements will be received at the office no later than the 20th of the month following the end of the previous month. i.e. Decembers Bank Statement will arrive at the office in or around January 20th.

Bank of Montreal Clients run from the 7th of the month to the 7th. And these Bank statements will be confirmed where they are being delivered.

People supported by PG&T, their bank statements are mailed directly to the case manager at PG&T. They will need to be requested from PG&T for Bank Reconciliation.

Access to person supported financial records is restricted to the person supported and SDM.

Where a resident receives banking support from staff, the Manager must approve any purchase over $50.

All arrangements with families who take responsibility for managing person supported finances will be reviewed annually when the personal budget plan is updated.

## PERSONAL NEEDS ALLOWANCE (PNA)

The following applies to all persons who receive O.D.S.P. and their cheque indicates Personal Needs Allowance and PG&T funding. Personal Needs Allowance (PNA) provided under O.D.S.P. is an allowance intended to enrich the quality of life of the person supported. The money provided for the personal use of the person supported is intended to purchase goods and services not considered to be the responsibility of the agency

Any individual receiving PNA is required to provide the agency with a monthly rent cheque which has been set up for automatic withdrawal at the end of each month. Therefore, their rent cheque is expected to cover the cost of their room and board and PNA money should not be used towards those expenses.

Purchases made with PNA money belong to the person supported and will remain his/her property wherever he/she lives. Persons supported may choose to go together to purchase large items. Prior to the purchase a written agreement between them must indicate the shared fate of the item if they no longer live together (i.e. they may choose to divide it 50/50.)

## Examples of Purchases - PNA

Hobbies, crafts, cosmetics, perfume, special shampoo, gifts, recreational/leisure activities, admission to community events, dinner out, cigarettes, alcoholic beverages, coffee shop purchases, snack food, personal purchases, special chair, bicycle etc.

## DSS’s Responsibilities - PNA

The Primary DSS assigned to a person supported that lives in a designated group home and receives a PNA will not only be required to follow the above procedures but will also be responsible to ensure that PNA money is spent in the interest of the person supported and not for expenses covered by the agency. The monthly review and sign off of financial records for each person supported by the DSS indicates the review took place and is in compliance with this policy.

## Manager’s Responsibilities - PNA

The Manager responsible for the persons supported that live in a designated group home and receive a PNA will review expenditures to ensure that PNA money is spent in the interest of the person supported and not for expenses covered by the agency. The monthly review and sign off of financial records for each person supported by the Manager indicates the review took place and is in compliance with this policy.

### **RECORD KEEPING**

Full financial records must be kept on all Supported Persons accounts, identifying each transaction requiring **removal of funds from the account, and receipts to match.**

There should be copies of cheques deposited as well as copies of any withdrawal slips with a signature which can only be obtained by the person supported.

These accounts may be held with identified advocates or family members, where this has been deemed appropriate.

DSS support provides an opportunity to discuss and/or counsel the person being supported regarding their needs in relation to their wants. It will also provide opportunity for the person supported to think through the purchase

All expenses and corresponding receipts for resident accounts are entered into a ledger. Receipts for items that have warranties lwill be kept until the warranty expires at the Person’s place of residence.

All withdrawals, whether cash, cheque or debit transaction, must be recorded in the ledger. The Ledger requires the name of the person supported and a full date i.e. dd/mm/yyyy

## LOANS/PURCHASES

Staff will NOT encourage borrowing/lending between persons supported. If necessary, persons supported may borrow from the agency’s petty cash to participate in an activity.

If at any time staff or a person receiving support wish to sell or purchase anything from one another written approval must be obtained from the Manager prior to the transaction.

## FINANCIAL RECORDS

Once a month the DSS will balance all financial records to ensure all are in order and will review these records with the person supported. The person supported and DSS will sign the record to indicate this has been done. Monthly the Manager and the DSS will review all financial records and sign the record. These records will then be forwarded to the Finance Department. These should be received no later than the end of the month following the month being reconciled. Example December should be received by January 31.

What is to be included in the Bank Reconciliation is a Cover sheet, Bank statement including the returned cheques if any, copy of cheque book Register and copy of Petty Cash Ledger and all pertaining receipts deposits slips and withdrawal slips in an envelope which is provided at the beginning of the year for 12months.

For the Month of January there should also be included the Personal Budget & Protocol and an Annual Financial Plan

Personal bank account information, bank books, ledgers, etc. are to be available at all times to the individual (and/or their significant other with his/her permission). When this is necessary the reason will be documented in the Annual Financial Plan. This will provide consent from the individual and their significant other.

Due to the confidentiality of this information it will be required that this information is kept in a secure location.

## INTERNAL AUDITS

The DSS is responsible for completing monthly reviews of bank account ledgers (statements, transactions and purchases) for persons supported who are identified as receiving support with their finances in their personal Support Plan.

**The Manager must review and sign off each person supported bank account ledger each month.** Discrepancies that cannot be adequately explained or supported will be investigated and a report will be forwarded to the Executive Director. If the discrepancy is more than $100 or there are more than three occurrences in one month the Executive Director will be notified and a designated Audit Team (Finance Department) will conduct an audit of the person supported accounts and report the findings to the Manager and Executive Director.

A designated Audit Team (Finance Department) will review annually (February/March) the books of accounts and financial records prepared and maintained for people who receive assistance with the management of their day-to-day finances as identified in their individual support plan. The review will include a report to the Executive Director who will forward to the board of directors for their March Meeting.

File share/Policies/Personal Funds Policy 11/01/2023

Annual Board Report – People we Support Finances

**Preamble:** To fulfill the Quality Assurance Measure requirement as outlined in the regulation below; annually the designated Audit Team will provide a report to the board of directors confirming independent reviews of people supported finances were completed during the fiscal year.

Ontario Regulation 299/10 Ontario made under the Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act, 2008; Quality Assurance Measures; Part VI Commencement; Part II Quality Assurance Measures with Respect to Service Agencies General states:

 *“****Assistance with the management of finances***

*6. (1) Each service agency shall have policies and procedures regarding assistance with the management of finances for a person with a developmental disability who receives services and supports from the agency, where the person requests assistance with the management of their day-to-day finances or the assistance is identified in the person’s individual support plan.*

*(2) The service agency shall prepare and maintain separate books of accounts and financial records for each person with a developmental disability who receives assistance from the service agency with the management of their day-to-day finances for each fiscal year.*

*(3) The service agency shall ensure books of accounts and financial records prepared and maintained in accordance with subsection (2) are independently reviewed by a third party annually; the independent review shall include a report to the board of directors.”*

**Procedure:**

* A Designated Audit Team (Finance Department) will perform audits as the independent third party reviewer.
* The Manager provides a list of persons supported whose personal support plan identifies assistance with day to day finances to the designated Audit Team (Finance Department).
* The reviewer contacts both the person supported and the Manager to explain the procedure, ask for the person supported permission to review their finances and schedule the date to perform the audit.
* The reviewer performs the audit as outlined in the scope of audit below.
* The reviewer prepares a report which identifies any significant findings and or recommendations. *Report name is Internal 3rd Party Audit of Individual Finances*
* Follow up as to the implementation of the recommendations is done by the Manager.
* Follow up during the next audit is done by the person performing the audit to confirm changes
* The designated Audit Team (Finance Department) is responsible for coordination and final reporting.

**Scope of Audit:**

Review current Supporting People with their Personal Finances Policy making recommendations where the policy does not reflect what is occurring. Review use of existing forms and procedures and make recommendations. Randomly review documentation such as bank balances with ledger balances, cash on hand with wallet ledger sheet and required signatures and back up receipts. The Financial Records for the year will be put in an envelope with the audit report attached and signed off by the Audit Team (Finance Department).

***ANNUAL Report: Wording***

***#*** *of people were identified as requesting assistance with their day to day finances. Audits were completed on all of the people within or just prior to the beginning of the fiscal year ending December 31,* ***YEAR.***

*In general records were in good order with no significant discrepancies. In an effort to continually review and improve systems and provide ongoing training the following recommendations were made:*

Fileshare/Forms/People Supported Finance Forms/Annual Board Reporting 11/01/2023