

Individual Finances

A. Individual Financial Plans

- a. Individual Financial Plans will be assessed at initial admission and reviewed in conjunction with annual ISP meetings.
- b. Upon admission, Friendship Community shall assist the Individual in applying for all financial benefits for which they may be eligible, and for release of funds from trustee accounts as appropriate to their needs in the home.
- c. The ISP team shall review benefits received, income, and expenses. Additionally, the Individual's investments, insurance policies, burial accounts, and any conserved resources identified by the family..
- d. All Individuals shall have a current, signed room and board contract which complies with applicable regulations. Room and board contracts shall be renewed annually, and a copy shall be kept in the Individual's file.
- e. The Individual's ability to manage their finances shall be documented in the initial and annual assessment. The Voluntary Admission Agreement shall be used to document the Individual's desire to receive assistance in the management of personal funds. This shall be re-signed annually.
 - i. Appropriate evaluation tools shall be used annually to assess the Individual's need for financial training and/or assistance.
 - ii. If appropriate, specific goals related to money management shall be included in the Individual's ISP.
 - iii. Individuals shall have their own bank account (may have Friendship Community as Representative Payee).
 - iv. Individuals shall have input and responsibility for a personal spending plan as their individual capacity allows.
 - v. Individuals must consent to purchases. This includes payment for team member purchases when accompanying the individual. If the individual does not have capacity to consent on a transaction by transaction basis, it should be included as part of the ISP.
- f. Friendship Community shall be the representative payee unless the family or designee chooses to assume this responsibility by signing an agreement that all necessary paperwork and reports shall be filed timely and that they shall personally replace lost government funding if the Individual loses benefits due to errors by the representative payee.

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B. Safeguarding Individual Funds

- a. The Financial Associate (FA), in coordination with the Residential Manager, is responsible to monitor Individual checking accounts, savings accounts, cash and any other monetary accounts at least every other month.
- b. Any changes in benefit eligibility shall be reported in a timely manner from the FA to the Residential Manager, or vice versa, depending on who gets the information first.
- c. The FA follows the following income reporting procedures.
 - i. Income is reported to Social Security for those who receive SSI.
 - ii. If an Individual receiving only Social Security goes over the Substantial Gainful Activity (SGA) limit for the year, the FA shall notify Social Security.
 - iii. County Supports Coordination receives the monthly reports of the Individual's income every other month when lockboxes are reviewed.
- d. Should the Individual's funds exceed \$1,500 (if receiving SSI) or \$6,000 (if not receiving SSI); the FA shall inform the Residential Manager on the lockbox audit memo. The supports team shall consult the Individual and/or their ISP concerning the best use and/or investment of the money.
- e. The FA shall prepare a monthly finance report notifying the Associate Directors, Residential Coordinators, Director of Operations, and Chief Financial Officer of the Individual's current asset status by the 15th of the month.
- f. Individuals have the right to determine how their funds are spent in consultation with the supports team. Consent must be provided any time an Individual makes a purchase for someone other than themselves, indicated by their signature or mark on the receipt. Individuals should have a statement of consented use of their funds included in the ISP, which can serve as consent if the individual does not have capacity to consent for each transaction.
- g. Personal item inventories shall be maintained for all Individuals. The Residential Manager shall ensure that the inventory is updated as new items are purchased. Please refer to the Individual Living section for further detail on the Personal Item Inventory.
- h. Individual Access:
 - i. Individuals have access to allowance cash/funds available at the home.
 - ii. Funds are held in individually designated lockboxes. The key to the lockbox shall be in the possession of the Individual, unless the assessment states the Individual is not responsible in handling his/her own finances. This will be noted in the Individuals ISP. The keys to access lockboxes shall be kept in a secured location at the home, with only the Residential Manager, Residential Coordinator, Associate Director, and/or designee having knowledge of the code to access the keys. The FA will also have access to the lockboxes for the purpose of auditing and replenishing.
 - iii. Additional cash bag monies shall be kept in a lockbox. An Impress Ledger is used to document Individual expenditures and shall be maintained online. The receipts and bank statements shall be kept in the appropriate Individual's lockbox. A reasonable amount of cash shall be available in a cash bag, based on Individual's need and usage. Cash bag transactions are documented on the Cash Bag Record by any Team Member assisting the Individual with spending and/or member of Leadership.
 - iv. The FA will be the conduit between the individual lockboxes and the Bank, securing cash to replenish the lockboxes as necessary with appropriate documentation from the lockbox such as receipts or large purchase requests. The FA, and ADO's are listed on the bank accounts as account signers for the individual accounts. The FA will verify bills, and pay them through the Individual's checkbook and record it accordingly on the Checkbook Ledger.
- i. When there is a shared expense among Individuals the receipt shall be copied for each Individuals' record. A note shall be written on or attached to the receipt to explain how the expense was shared

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and the total each Individual was responsible to cover. The receipt shall be highlighted for what the Individual was responsible for paying.

- j. When the FA finds a deficiency in an Individual's lockbox, a report shall be made to the Residential Manager and Coordinator. If further review leads to the conclusion that there is an unexplained deficiency, investigation protocols shall be implemented immediately upon confirmation of missing and/or misuse of funds. All confirmed missing funds shall be replaced by Friendship Community.
- k. Financial Team Members shall prepare monthly bills for Individuals based on the Room and Board agreement.
- l. The FA coordinates preparation of annual income tax filing on behalf of Individuals for which Friendship Community is the representative payee and ensures that a copy is kept in the Individual's file. Commingling Individual funds with the organization's operating funds is prohibited.
- m. Borrowing of funds between Individuals and Team Members, as well as between Individuals, is prohibited.
- n. Using an Individual's money as a reward in a behavior support plan is prohibited.
- o. Individuals must provide consent to use their personal funds as payment for damages they have caused. The consent must be in writing and a copy maintained in the Individual's file.
- p. Alleged misuse of Individual funds or property shall be thoroughly investigated in accordance with the Incident Management Policy. Any Team Member who engages in such conduct shall be subject to disciplinary action.
- q. Any expense (event tickets, travel, single item over \$100, spend down, or any atypical expense) that exceeds \$100 requires financial planning and shall be reviewed by the ISP support team, which may include the Individual and/or their legal guardian, Residential Coordinator and Associate Director by using the Major Expense Form. For expenses exceeding \$300, a notification email to the Supports Coordinator shall be attached to the Major Expense Form. Major Expense cash shall not remain in the cash bag for more than 2 business days.

C. Other Considerations

- a. Bonus Cards/Account: there are many retail/service companies that encourage "bonus" cards for the company's marketing purposes. The following considerations should be made when obtaining a bonus card/account for an individual
 - i. Bonus cards provide discounts in exchange for personal data that is gathered by the company. The individual must consent to the collection of their personal data in order to open a bonus card/account.
 - ii. The bonus card must be in the individual's name, with their personal information attached to the card (e-mail/phone # etc.).
 - iii. The bonus card and points may be used only for purchases for the individual. Team members and other individuals may not benefit from the bonus card/account including by not making purchases that would build benefit to the individual. For instance, a team member may not use the bonus card to purchase their beverage with an individual's bonus card to receive a discount, even though it also adds points to the individual's benefit.
- b. Other payment methods – Other payment methods may be used in lieu of cash for individuals' purchases.
 - i. This includes prepaid cards, debit cards, gift cards etc. Any form of payment that is loaded in a card or digital payment system., outside of the checking account.
 - ii. The transactions, regardless of the financial instrument used will be recorded on a ledger similar to the cash.

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- iii. The ledger and transactions will be recorded on an appropriate ledger and supported by a receipt at the time of the transaction. These records will be reviewed by FA to ensure accuracy and appropriateness.

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D. Impress System for Management of Individual's Funds.

- a. The Impress System of cash management is intended to.
 - i. Ensure accurate accounting of cash on hand for each Individual.
 - ii. Increase the security of Individual's cash by enhanced Team Member accountability and a limited number of Team Members who have access to the Individual's cash.
 - iii. Improve efficiency of the financial tracking process.
- b. General Procedures
 - i. Each Individual shall have a designated locked box in which they store their cash for usage.
 - ii. Access to the locked box is limited to the FA, Residential Coordinator, Associate Directors, Residential Managers, the Individual, and/or Approved Designee within the home.
 - iii. Team Members shall receive appropriate training prior to gaining access to an Individual's personal funds.
 - iv. When the Residential Manager plans to be away for an extended time, they shall notify the Residential Coordinator to provide oversight of the Impress system.
 - v. Signing a blank check is not permitted under any circumstance.
 - vi. The Individual's Supports Coordinator must be notified when an Individual wishes to spend \$300 or more on any one purchase. The notification email shall be attached to the approved Major Expense Form.
 - vii. Each Individual's ISP Team shall establish an amount of cash on hand that makes sense for the Individual. The established amount shall be recorded and placed in the locked box.
 - viii. The Residential Manager, Residential Coordinator or Associate Director shall ensure that the cash available to each Individual is replenished as needed.
 - ix. All financial instruments in the lockboxes must be reviewed and balanced at least once a week by the Residential Manager, regardless of spending. The lockboxes shall be reviewed by the Residential Coordinator on at least a monthly basis.
 - x. A new online Checkbook Ledger and Impress Ledger shall be started at the beginning of every month.
 - xi. All receipts for a given month shall be placed in an envelope and labeled with the corresponding month and year.
 - xii. Prior to a Team Member, who had access to an Individual's funds, leaving a Program permanently, a count of all funds shall occur by that Team Member and their supervisor simultaneously.
 - xiii. Individual's finances may be reviewed at any time, announced or unannounced, by government personnel and/or Friendship Community Leadership.
- c. Use of Cash Bag
 - i. Each Individual shall have a cash bag that is accessible to all Team Members working on a given shift.
 - ii. The ISP Team shall determine a reasonable amount of cash to be kept in the cash bag for general use. This amount must be less than what is maintained in the locked box.
 - iii. The Residential Manager, or designated member of Leadership in the absence of the Residential Manager, is responsible to ensure an adequate amount of cash is available for the Individual's use.
 - iv. All expenses must be documented with a receipt.
 - v. Always obtain a store receipt. If this is not possible (i.e.- church tithing, farmers market, etc.) a hand written FC Individual Receipt with a description of the transaction shall be completed with the same information as required on a store/vendor receipt. All Individuals

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shall have their expenditures reviewed with them, unless otherwise specified by the Individual's ISP Team.

- vi. All money and receipts for a given shift must be returned to the cash bag by the end of each shift and a count shall be performed to ensure all funds are properly accounted for.
 - vii. A current Cash Bag Record documenting activity related to the cash bag shall be maintained.
 - viii. The amount in this cash bag shall be checked every shift and documented on the Cash Bag Daily Check Form along with a secondary witness signature.
- d. Use of Lockbox
- i. The Residential Manager or designated member of Leadership shall check the cash bag twice weekly. All receipts shall be transferred to the Impress Ledger online. Receipts are to be kept in the lockbox. Cash in the cash bag shall be replenished as necessary.
 - ii. All cash transactions shall be recorded on the online Impress Ledger.
 - iii. Receipts shall be numbered in consecutive order and entered into the appropriate category on the online Impress Ledger. The sum should always equal the amount of cash on hand which has been established for the Individual.
 - iv. When a lockbox is replenished, the deposit amount shall be recorded in the "Deposit" column. The sum of the Lockbox Cash plus Cash Bag must equal the amount of cash on hand that has been established for the Individual.
- e. Checks Written to Cash
- i. Checks written to "Cash" must be noted in the "Category" column.
 - ii. All checks written to "cash" should be recorded in the online Impress Ledger to ensure that all cash monies are accounted for.
 - iii. The Finance Associate must record the purpose on the memo line of the check for any large cash expenditure. The Major Expense (event tickets, travel, single item over \$100, spend down, or any atypical expense) Form shall be completed and approved prior to any expense over \$100.
- f. Reconciling Discrepancies
- i. If a discrepancy is discovered, the Residential Manager or Residential Coordinator shall be notified immediately. If the reason for the discrepancy is unable to be determined the Designated Agency Personnel (DAP) shall be notified immediately and the DAP shall determine whether or not an incident report needs to be entered.
 - ii. If an investigation results in founded misuse of funds by a Team Member, the matter may be referred to law enforcement personnel.
 - iii. A Team Member who misuses an Individual's funds is subject to disciplinary action up to and including termination.
 - iv. Any Team Member can have their access to and responsibility for an Individual's funds revoked at any time.
 - v. Friendship Community shall reimburse an Individual whose funds have been misused or stolen by Team Members. Friendship Community expects when it has been determined a Team Member has misused an Individual's funds, they may be required to pay restitution.
 - vi. The FA shall notify both the Residential Manager and Residential Coordinator immediately when discrepancies are noted during their review of an Individual's finances, so that the appropriate follow-up can occur immediately.

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E. Burial & Special Needs Pooled Trust Accounts

- a. In order for Individuals to maintain eligibility for SSI, they must not have more than the current allowable maximum amount of assets. If they accumulate more than the current maximum, the Residential Manager or Residential Coordinator shall discuss the establishment of an irrevocable burial account or special needs trust with the Individual and their Support Team. Friendship Community generally uses Arlington Heritage Group for such trusts.
 - i. Burial Funds - are an irrevocable burial fund do not count as an asset in calculating eligibility for SSI. Such an account can be withdrawn only for burial purposes and must be associated with a burial plan Burial reserve accounts must ensure the following:
 - ii. Burial reserve funds are deposited either on a one-time basis or through periodic deposits.
 1. Bank statements are received no less than annually.
 2. The bank is notified of all Individual address changes.
 3. All pertinent information on the existence of the burial reserve account is filed with the Supports Coordinator and is in the Individual's file.
 4. Friendship will keep records in the Finance Office for each Individual and give Residential Managers and/or other members of Leadership access to the totals for such accounts, so that future deposits may be made.
 5. For SSI beneficiaries, the FA shall notify the County Assistance Office of Individuals with burial accounts. The notification shall include the amount and the holder of the account.
 - iii. Special Needs Pooled Trust Accounts (SNPT) – is a type of irrevocable trust that individuals with disabilities may maintain while not being counted toward assets calculations for government benefits.
 1. Friendship Community has a Special Needs Pooled Trust established with Arlington Heritage Group for such trusts.
 2. SPNT can be established and initially funded from the individual's family/natural supports, or it can be funded by the individual's income.
 3. The individual may contribute to the SPNT on a regular basis.
 4. The purpose of the SPNT funds is to provide funding to benefit the individual, often including, but not limited to living expenses, medical expenses, educational or vocational expenses, entertainment, and travel.
 5. Records of the Individual balances and is received and monitored by the Financial Team, and available to regulatory oversight representative or institutions who may need to review them.
 6. The Chief Executive Officer, Chief Financial Officer and Director of Operations are the Trustees.

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F. Individuals Making Donations Within Friendship Community

- a. Friendship Community recognizes the ability and desire of Individuals to choose to use their financial resources to give support to churches, causes, charities, and organizations which they choose to support. If an Individual sees a need and chooses to support that need financially, that choice shall be respected.
- b. Friendship Community also recognizes its responsibility to assist the Individuals in safeguarding the Individuals' funds from uses which are not within the desire or best interest of the Individual. Friendship Community intends to seek balance between safeguarding funds while upholding the dignity of the Individual and invading the privacy of the Individual to the lowest degree possible.
 - i. Friendship Community shall consult the ISP Support Team in order to gain feedback for making donations beyond routine church giving. Documentation of approval and donations shall be kept within the Individual's financial records.
 - ii. An Individual's Support Team shall be consulted if the Individual expresses interest in donating:
 1. To a cause/charity/church other than the one they actively participate in
 2. Over \$520 per year to their church of regular attendance or membership
 3. To Friendship Community Ministries
- c. Other considerations
 - i. If the request is disputed, the Individual has the right to follow grievance procedures. Enabling Individuals to make donations without following these guidelines shall be subject to disciplinary action per the disciplinary policy.
 - ii. Friendship Community shall make available financial records for outside government entity review as appropriate.
 - iii. Individuals without the verbal ability to express themselves may have the desire to make donations to causes or charities. In those situations, the Individual's Support Team shall discuss donations during a Support Team meeting and shall add a statement to the Financial Section of the ISP in regards to limits and desired places to donate.

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G. Annual Asset Review

- a. As Representative Payee of an Individual's finances, Friendship Community maintains responsibility for updating the County Assistance office on current values of any assets, upon requests.
- b. These assets may include, but are not limited to, burial funds, special needs trust funds, and cash values for life insurance policies.
- c. If an Individual, parent, guardian, POA, or family member chooses to acquire an asset on the Individual's behalf, it shall be their responsibility to ensure that the asset does not jeopardize the Individual's benefits. This includes any asset that is nonexempt from annual and semi-annual reporting.
 - i. Nonexempt assets include:
 1. Checking and savings accounts
 2. Whole Life Insurance policies
 3. Cash values of life insurance policies over \$1,500
 4. Investments, including stocks, bonds, and mutual funds
 5. Money market accounts
 6. Certificates of deposit
 7. Second or third real property interest
 8. Certain revocable funeral and burial funds
- d. The Finance Department will distribute an, an annual asset review to the Individual's parent(s), Guardian(s), or Power of Attorney to request updates related to assets on behalf of the Individual, as applicable. This information, including supporting documentation related to current values and/or balances, shall be provided directly to the Finance Team at Friendship Community within 30 days of receipt to ensure accurate information remains on file.