

Mary Lee Fay  
Authorized Signature

**Number:** SPD-AR-12-015  
**Issue Date:** 4/9/2012

**Topic:** Developmental Disabilities

**Due Date:**

**Subject:** Tracking and Monitoring Children's SSI Funds

**Applies to (check all that apply):**

- |  |  |
|--|--|
| <input type="checkbox"/> All DHS employees                     | <input type="checkbox"/> County Mental Health Directors  |
| <input type="checkbox"/> Area Agencies on Aging                | <input type="checkbox"/> Health Services   |
| <input type="checkbox"/> Children, Adults and Families         | <input type="checkbox"/> Seniors and People with Disabilities  |
| <input checked="" type="checkbox"/> County DD Program Managers | <input checked="" type="checkbox"/> Other (please specify): Children's Foster Care Certifiers; CDDP Service Coordinators; ODDS Children's Residential Specialists; ODDS Children's Residential Providers |

**Action Required:** As a result of an audit by the Social Security Administration (SSA), The Office of Developmental Disability Services (ODDS) is implementing these actions to assure that SSA requirements for monitoring children's room and board and personal spending funds are followed. The ODDS is sending out a letter to foster care and residential providers regarding expectations for financial management and tracking of children's funds (see attached copy of letter).

ODDS will provide training to Community Developmental Disabilities Program (CDDP) Foster Care (FC) Certifiers and Service Coordinators regarding requirements for tracking children's funds. A schedule for video conferencing or webinar training will be forthcoming soon. It is a requirement that at least one Services Coordinator representative from each CDDP participate in the training. In addition, it is an expectation that FC Certifiers will in turn train children's foster care providers regarding expectations for monitoring children's funds, and ODDS Children's Residential Specialists will train the children's residential providers.

As per the Oregon Administrative Rule, CDDP Service Coordinators are responsible to conduct financial reviews for children in foster care and residential programs a minimum bi-annually (at least 2 times a year – preferably about every 6 months.) (For children placed in residential programs, CDDP staff and the Children's Residential Specialist will coordinate who will visit the home and monitor the services.) When

conducting financial reviews, Services Coordinators should thoroughly complete one of the ODDS approved financial review checklists. Please note, CDDP Service Coordinators are expected to do service monitoring (including financial review) for children in foster care regardless of whether the child is in a DD or Child Welfare certified home.

Service Coordinators are responsible to report deficiencies identified during monitoring reviews to FC Certifiers or DHS Office of Licensing and Regulatory Oversight, including providers not making records available for review. FC Certifiers may issue violations to the provider as warranted. CDDP FC Certifiers will review financial records prior to certification renewal.

In order to assure these corrective actions are impacting practice, ODDS Disability Analysts will audit randomly selected files statewide every 6 months.

**Reason for Action:** In December 2011, ODDS received the results of an onsite audit by the Social Security Administration (SSA) that occurred in July 2011. The audit reviewed documentation of funds for children for whom ODDS serves as protective payee. The audit found significant deficiencies in care providers' (Foster Care and Children's Residential Services) documentation of the children's personal funds. As a result of the audit, ODDS is implementing these corrective actions.

**Field/Stakeholder review:**       Yes       No

**If yes, reviewed by:**

*If you have any questions about this action request, contact:*

<b>Contact(s):</b>	Corissa Neufeldt		
<b>Phone:</b>	(503) 945-6742	<b>Fax:</b>	
<b>E-mail:</b>	<a href="mailto:Corissa.Neufeldt@state.or.us">Corissa.Neufeldt@state.or.us</a>		

Date:

To: Child Foster Care Providers

From: Carol Hitchen & Jay Clark  
SSI Program Representatives

Subject: Financial Record-Keeping Requirement

The Department of Human Services, Office of Developmental Disabilities Services (ODDS) is the representative payee for Social Security funds for the child/children in your care. ODD has financial record keeping requirements set by the Social Security Administration (SSA). The requirements that are passed on to you are in the Oregon Administrative Rules (OAR 411-346-0190) governing foster care certification, and in your Medicaid Provider Enrollment Agreement (PEA).

1. ODDS is taking measures to ensure that foster care providers follow the financial record keeping requirements contained in the aforementioned rules and PEA, **regardless of what agency certifies your foster home (Child Welfare or ODDS).**
2. ODDS will be conducting random audits of these financial records to ensure your records comply with the financial requirements;
3. Your local service coordinator will monitor the financial records as required by rule and must communicate noncompliance to your certifier and/ or to the ODDS Children's Foster Care Coordinator.
  - In the event a Foster Care Provider is not following the PEA requirements ODDS can take action to discontinue Foster Care payments.
4. ODDS will assist you to comply with all provisions of the financial record keeping requirements.
  - Financial record keeping DVD is available through the DD Foster Home Certifiers.
  - For the name of the DD certifier in your area you may contact your service coordinator or contact Diana Jacobsen at 503-378-5001 or [Diana.Jacobsen@state.or.us](mailto:Diana.Jacobsen@state.or.us).
  - You can also visit our website at [www.oregon.gov/DHS/spd/provtools/afh-dd/training/index.shtml](http://www.oregon.gov/DHS/spd/provtools/afh-dd/training/index.shtml) for training materials.

If you have questions about this letter you may contact Diana Jacobsen as noted above.

**Enclosed are financial record-keeping forms with examples for your use.**

Date:

To: Residential/Proctor Agencies

From: Carol Hitchen & Jay Clark  
SSI Program Representatives

Subject: Financial Record-Keeping Requirements

The Department of Human Services, Office of Developmental Disabilities Services (ODDS) is the representative payee for Social Security funds for the child/children in your care. ODDS has financial record keeping requirements set by the Social Security Administration (SSA). These requirements apply to everyone who has a role in managing and protecting the child's funds; ODDS, your county service coordinator and you. The requirements are included in Oregon Administrative Rules (OAR 411-325-0380) governing 24 Hour Residential Services. Each child is required to have an Individual Support Plan (ISP) which addresses how the child's funds must be handled.

Responsibilities for monitoring record keeping for SSI funds include:

- Residential Service providers are required to follow the financial record keeping requirements contained in the OAR's.
- The ODDS Residential Specialist is responsible for **monitoring** the ISP and the financial records for children in residential care. The Residential Specialist will communicate concerns to licensing and the ODDS Children's SSI Unit.
- Due to a recent SSA audit we have learned residential providers are **not meeting record keeping requirements**. As a result ODDS will conduct random audits of financial records.
- In the event compliance is not being met sanctions to your agency may result.

Please let us know if you have questions about this letter and contact your Residential Specialist if you need assistance or training in financial record keeping.