

OPRA CLIENT FUNDS MANAGEMENT

General Principles

1. Provider should have a policy that addresses how day-to-day client funds issues are managed.
2. Provider should have internal controls in place.
3. Staff should be trained on the policies.
4. While there may be differing opinions, deference should always be given to the individual handling their own funds.
5. Guardianship issues must be addressed/deference given to individual choice. After consultation with the individual (and/or their guardian), if team believes individual cannot handle own money, individual must be given due process.
6. There shall be no inventories required in unlicensed homes.
7. Any suspected misappropriation should be reported immediately.

Specific Issues

1. Clients should have separate accounts.
2. Policy on billing paying.
3. Policy on banking.
4. Policy on groceries and personal spending.
5. Policy on use of personal funds being used for vacations.
6. Provider should review and conduct assessment as to whether individual can assume responsibility for their own finances.

7. Transaction updates updated at end of shift (must reconcile) – document the transaction before end of shift.
8. Periodic monitoring (monthly) of assets to ensure no loss of Medicaid eligibility.
9. Quarterly review of transactions for every individual.
10. Internal controls (monitor should not be involved in the day-to-day transaction).
11. Individual is fully involved in management as much as possible.
12. When possible, direct deposit.
13. Bank books – secure location.
14. Have a policy on ATMs.
15. Monthly records kept monthly.
16. Policies regarding transactions between providers and individuals only with superior and all transactions must be based on fair market value.
17. Consumers should sign any time they get spending money (cash).
18. Whistleblower Policy/Compliance Officer – call 1-800-_____.
19. Notation in memo line on check.
20. No staff shall sign individual's name.
21. Agency should reimburse individual when fault is agency's as determined by the agency.
22. No checks written to cash unless supervisor approves.
23. Financial understanding should be documented and discussed at staff meetings.
24. Checks should be deposited as soon as possible.
25. All entries with individual's ledger should be dated and signed.
26. Ledgers should be gone over with individual/guardian and returned to be reconciled.

27. Cash on hand should be kept locked with check book if deemed necessary by individual.
28. Transactions should be documented in ink and no white out - only crossed out/signed/initialed/dated.