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SSA CHILD BENEFITS POLICY

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Appendix A: Table of Notifications Provided by Social Workers

I. POLICY

The Department of Children and Families (the Department) has a financial responsibility to meet the needs of all children in its care and custody, including the individualized needs of children with disabilities. Many children in the care or custody of the Department receive or are eligible to receive benefits from the Social Security Administration (SSA). These benefits include Supplemental Security Income (SSI) for children with disabilities and Retirement, Survivors, and Disability Insurance (RSDI) for children with a parent who is disabled, retired, or deceased who was a qualified wage earner.

SSI and RSDI benefits (SSA benefits) must be used to meet the personal or recreational needs of the recipient. It is the Department's policy that SSA benefits will not be used towards the cost of a child's care while in the Department's care and custody. The Department seeks federal foster care reimbursement for a child only if reimbursement will not impact the child's eligibility for benefits or the dollar amount of benefits. SSA benefits can improve recipients' quality of life by ensuring funding for disability-related needs and providing opportunities to participate in age-appropriate activities. For older children, SSA benefits can foster the development of self-sufficiency by strengthening independent living skills and improving access to housing, transportation, and educational programs. The Department recognizes that children transitioning out of the child welfare system often experience economic hardships, including housing instability and homelessness. The Department's conservation of SSA benefits for children in the Department's care or custody can provide a financial safety net.

The Department screens every child who comes into care or custody to determine if they are currently receiving SSA benefits or if they are potentially eligible to receive them. For children currently receiving SSA benefits, the Department works with the family to ensure that the SSA benefits are used or conserved for the child's present and future personal needs. For children who are not receiving SSA benefits but are found eligible, the Department will initiate an application for benefits on the child's behalf. When children in the Department's care and custody receive SSA benefits, the Department may apply to become the Representative Payee according to SSA guidelines.

II. PROCEDURES

A. Definitions

Acceptable Documentation – Includes paper receipts, photocopies, screenshots, scanned or PDF receipts, copies of electronic statements, canceled checks, bank statements, credit card statements, or any other verifiable documentation. When receipts are unattainable, documentation may include a written, signed statement from the foster parent with a description and the amount of the expense.

Accounting Information – Information about the child's benefits that includes (i) the amount and source of benefits collected by the department and credited to any account maintained on behalf of the child; (ii) the balance of any account maintained on behalf of the child; (iii) any amounts deducted by the department and the reasons for the deductions; and (iv) information regarding all the child's assets and resources, including benefits, insurance, cash assets, trust accounts, and earnings, if such assets or resources are controlled by the Department.

Achieving a Better Life Experience (ABLE) Account – ABLE accounts are special savings accounts available to individuals with disabilities to allow them to build assets without jeopardizing their eligibility for SSI or other means-tested government benefits.

Continuing Disability Review (CDR) – Periodic reviews by SSA of SSI recipients, or RSDI recipients who are Disabled Adult Children (DAC) to determine if they still meet the requirements for eligibility.

Personal Needs Allowance (PNA) Account – An account established and administered by the Department on behalf of a child in its care or custody. The account is funded by the child's SSA monthly benefits and is to be used for the child's personal needs.

Placement Resource – The provider of Department foster, pre-adoptive, or kinship care, comprehensive foster care services, congregate care services, or residential services.

Representative Payee – A person or organization, appointed by SSA, to receive benefits for a recipient who is unable to manage or direct benefits independently.

Retirement, Survivors, and Disability Insurance (RSDI) – This benefit type, also known as Title II, is available for children who have a parent that contributed to Social Security who is either deceased, retired, or disabled.

Social Security Benefits Unit (SSBU) – Provides administrative management of the SSA benefits received by children in the Department's care and custody.

Social Security Administration (SSA) – An independent executive branch agency of the U.S Federal government that administers RSDI and SSI benefits.

Supplemental Security Income (SSI) – This benefit type, also known as Title XVI, is available for children with certain disabilities who meet the eligibility criteria set by SSA and federal law.

State-Approved Vendor – A placement resource who has been approved as a vendor to whom the Commonwealth can issue payments through the Commonwealth's accounting system.

Qualified Disability Expense (QDE) –Term used and defined by federal law to describe acceptable expenses eligible to be paid for using ABLE account funds.

B. Roles and Responsibilities

Adolescent Outreach Worker is responsible for:

- Working with children on their caseload who receive SSA benefits to help them learn financial literacy skills and understand their benefits.

Area Administrative Manager (AAM)/designee is responsible for:

- Approving requests for a disbursement from the child's PNA/ABLE accounts through the electronic record;
- Helping the Social Worker complete CDRs and receipts and documentation for SSA reviews, as needed;
- Overseeing the closure of PNA accounts; and
- Supporting the Area SSA Liaison.

Area Director (AD)/designee is responsible for:

- Designating a member of the Area Office to serve as Area SSA Liaison.

Area Program Manager (APM) is responsible for:

- Supporting the Social Worker and Supervisor in completing the activities in the policy.

Area SSA Liaison is responsible for:

- Helping the Social Worker complete all activities outlined in this policy by providing subject matter expertise;
- Helping the Social Worker locate financial literacy materials and/or resources, as needed;
- Overseeing the closure of PNA accounts;
- Supporting communication between the Social Worker and the SSBU, as needed; and
- Working closely with the SSBU and the Central Office.

Social Security Benefits Unit (SSBU) is responsible for:

- Creating PNA accounts;
- Applying for and creating ABLE accounts within the electronic record, as appropriate;
- Transferring funds from PNA accounts to ABLE accounts on a monthly basis to ensure the child continues to remain eligible for SSI benefits;
- Processing approved disbursements from PNA/ABLE accounts; and
- Reconciling the child's PNA account and sending any conserved funds to the child's ABLE account or SSA when a PNA account closure is initiated.

Placement Resource is responsible for:

- Helping the Social Worker identify the child's current and foreseeable needs (*See Procedures E – Use of Account Funds*);
- Obtaining receipts for all disbursements totaling $100 or more and forwarding receipts to the Social Worker;
- Returning any unexpended funds totaling $20 or more to the AAM within 30 days;
- Using any unexpended funds totaling less than $20 on the child's personal needs; and
- Working with children who receive SSA benefits to help them learn financial literacy skills and understand their benefits.

Regional Social Security Benefits Coordinator is responsible for:

- Consulting with Social Workers and Area SSA Liaisons about SSA benefit eligibility, applications, appeals, reviews, transfers, and any other related communications between the Department and SSA;
- Documenting consultation activities related to SSA benefits in the electronic record; and
- Providing access to materials, resources, and support to Department staff regarding SSA benefits and financial literacy.;
- Tracking data and reviewing metrics to ensure compliance with Department policy, regulation, or statute.

Social Security Benefits Manager is responsible for:

- Supporting Regional Social Security Benefits Coordinators in consultations with Social Workers and Area SSA Liaisons to support the understanding of SSA benefits;
- Consulting on decisions to appeal a denial of benefits by SSA;
- Consulting on determinations to pursue direct transfer of benefits to a child from the SSA; and
- Collaborating with and coordinating between the SSBU, Central Office, and the SSA.

Social Worker is responsible for:

- Identifying children who may be eligible for or are currently receiving SSA benefits;
- Completing and filing the applications for benefits and/or Representative Payee appointment with SSA;
- Identifying the child's current and foreseeable needs (*See Procedures E – Use of Account Funds*);

- Submitting requests for disbursement from the child's PNA/ABLE accounts and uploading receipts;
- Working with children on their caseload who receive SSA benefits to help them learn financial literacy skills and understand their benefits;
- Updating the SSA when changes occur which may impact a child's eligibility for benefits; and
- Completing and documenting all notifications outlined in this policy.

Supervisor is responsible for:

- Supporting the Social Worker in completing all activities outlined in this policy.

Foster Care Social Worker (Foster Family Social Worker/Kinship Social Worker) is responsible for:

- Helping the Placement Resource/foster parent identify the child's current and foreseeable needs (*See Procedures E – Use of Account Funds*);
- Supporting communication between the Placement Resource/foster parent and the child's Social Worker about the any potential requests for funds; and
- Supporting the Placement Resource/foster parent with providing information about financial literacy and the child's SSA benefits as needed in collaboration with the Area SSA Liaison, Regional Social Security Benefits Coordinator, and the child's Social Worker.

C. Language Access

Working with individuals who are Deaf or Hard of Hearing and individuals with Limited English Proficiency:

The Department's Language Access Plan (LAP) outlines how the agency is ensuring meaningful access to its programs, services, activities, and materials for all consumers who self-identify as Limited English Proficient (LEP). The Department secures interpreter services for individuals who identify as LEP in a timely manner. To secure services for individuals who are Deaf and/or Hard of Hearing, the Social Worker contacts the Department's identified contact with the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) who can make requests directly from MCDHH as described in the Appendix to the Disability Policy. The Social Worker, or other Department staff, will not require or suggest that an individual who identifies as LEP bring their own interpreter or communication specialist to meetings. The Social Worker, or other Department staff, will not rely on an adult individual accompanying a consumer who identifies as LEP to interpret for the consumer unless it is an emergency involving an imminent threat to the safety or welfare of an individual or the public and there is no other interpreter available; OR the individual specifically asks that the accompanying adult interpret or facilitate communication for them, the accompanying adult agrees to do so, and reliance on the adult is appropriate under the circumstances.

For all individuals who identify as LEP, documents must be translated and provided in the individual's preferred language. The Social Worker arranges for the documents to be translated by using the Department's translation service contract in the Area Office. *For the purposes of this policy, documents requiring translation include but are not limited to any notifications sent related to SSA Benefits.*

D. Procedures: OBTAINING AND MAINTAINING BENEFITS

Reviewing a child's eligibility for SSA benefits is a continuous process and not a one-time event. The initial assessment will occur when the potentially eligible child comes into the care or custody of the Department. Eligibility will be continuously reviewed at regular intervals throughout the child's time in the Department's care or custody. The appropriateness of the Department potentially serving as the child's Representative Payee will also be reviewed upon initial application for benefits and subsequently reviewed at regular intervals to ensure the child's best interests continue to be met.

Review for Eligibility

1. For each child who enters placement, the Social Worker, in consultation with their Supervisor, reviews medical and behavioral health information, and/or other information in the electronic record (e.g., dictation, previously completed Family Assessment and Action Plan) to identify children who:
    - Currently receive SSA benefits; and/or
    - May have physical and/or psychological impairments (see SSA guidelines); and/or
    - Have a parent who has a disability, is deceased, or is retired.
2. The Social Worker consults with the child's parent(s)/guardian(s) and other collaterals who may have information about the child's eligibility.
3. This information will be reviewed within the first 6 weeks of placement in the Initial Placement Review (See Permanency Planning Policy), or **no later than 60 days** from when a child is placed in the Department's care or custody. The Social Worker documents the results of the eligibility review in the electronic record and informs the Area SSA Liaison of the results, to understand next steps.
4. The Social Worker will regularly screen for new or changed circumstances that could impact the child's eligibility (e.g., death of a parent, new mental health diagnosis, special education evaluation, etc.). While the child remains in the Department's care and/or custody, screening must occur at least annually.
5. Eligibility status will be reviewed and documented during regular supervision and may be reviewed as a part of:
    - Updates to the Family Assessment and Action Plan;
    - Foster Care Reviews;
    - Permanency Planning Conferences;
    - Permanency Hearings;
    - Reunification Readiness Reviews;
    - Youth Readiness Assessments; and
    - Transitional planning meetings for children.

Determining and Applying for Representative Payee Status

6. The Representative Payee for a child receiving SSA Benefits is determined by the SSA.
7. If a child was receiving SSA benefits prior to placement in the Department's care or custody and their parent/guardian is Representative Payee, the Social Worker, in consultation with the Supervisor, determines whether the Department will request that the SSA appoint the Department as the Representative Payee.
8. If a child was not receiving SSA benefits prior to placement in the Department's care or custody, but is determined to be potentially eligible, then the Social Worker will initiate an application for benefits for the child as soon as possible. (*Note: The date that the Department initiates first contact with SSA is the earliest date a child can begin to receive benefits.)* The Social Worker, in consultation with the Supervisor, determines whether the Department will request that the SSA appoint the Department as the Representative Payee.
9. When determining if the Department should request that the SSA appoint the Department as the Representative Payee, the Department must consider whether becoming Representative Payee will negatively impact the goal of reunification (e.g., If a parent would be unable to comply with the child's permanency plan of reunification due to the financial hardship caused by loss of

Representative Payee status; or the child is expected to be in Department care, custody, or placement for a short period of time).

10. The determination about whether the Department will apply to be Representative Payee should be discussed at the Initial Placement Review and documented in the electronic record.
11. If the Department decides to apply to be Representative Payee, the Social Worker notifies the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the decision. The Social Worker will document notifications in the electronic record.
12. The Department's decision to apply (or not apply) to be the Representative Payee will continue to be reviewed and documented during regular supervision.

Apply for SSA Benefits

13. If the Social Worker, in consultation with the Supervisor, determines that the child is potentially eligible for SSA benefits, the Social Worker completes and files the necessary applications for benefits and/or Representative Payee appointment with SSA. The Social Worker may consult with the Area SSA Liaison and/or the Regional Social Security Benefits Coordinator for specific technical assistance in completing SSA forms and will notify the Area SSA Liaison after applying.
14. The Social Worker notifies the Department's attorney, the child's attorney, and the parent/guardian(s) attorney(s) when the Department applies for SSA benefits on behalf of the child. The Social Worker will document notifications in the electronic record.

Notification of SSA Benefits

15. When SSA issues a notice of benefit award or denial, the social worker notifies the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the child's eligibility determination and documents the child's eligibility status, and completion of required notifications, in the electronic record. Any Social Worker who has questions about the status of a child's application may contact the local SSA office.

Appeal of SSA Decision

16. If SSA issues a notice of denial of benefits, the Social Worker and Supervisor review the reason and attempt to resolve the issue. The Area SSA Liaison, the Regional Social Security Benefits Coordinator, and/or the SSBU, will assist as needed.
17. If the issue is not able to be resolved, the Social Worker and Supervisor may file a notice of appeal. The Social Worker may consult with the Social Security Benefits Manager/designee as needed.
18. The Social Worker notifies the DCF Central Office SSA Benefits Team, the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the Department's decision about whether to appeal. The Social Worker will document notifications in the electronic record.
19. If an SSA hearing is required, the Social Worker notifies the attorneys for the Department, child, and parent/guardian(s), if necessary, of the date and time of the hearing.
20. The Social Worker, or Department designee, attends the hearing and brings all relevant documentation.
21. When SSA issues a hearing decision, the Social Worker notifies the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the decision and child's eligibility determination. The Social Worker documents the child's eligibility status, and completion of required notifications, in the electronic record.

Complete Eligibility Reviews

22. To ensure ongoing eligibility for SSI, SSA requires the Representative Payee to complete periodic Continuing Disability Reviews (CDR) and redeterminations (e.g., when a child turns 18 and a redetermination is made to understand if they meet the criteria outlined for benefits for those age 18 and older). Eligibility reviews are sent by the SSA to the SSBU.
23. When the SSBU receives the review, the SSBU will forward the packet and instructions for completion to the Area SSA Liaison.
24. The Social Worker completes the packet within the requested time frame. The Area SSA Liaison, the Regional Social Security Benefits Coordinator, and/or SSBU, will assist as needed. The Social Worker gives the completed packet to the Area SSA Liaison. The Area SSA Liaison sends the completed packet to the SSA and the SSBU according to the instructions provided.
25. If the SSA issues a notice of denial, termination, or reduction of benefits following a CDR or a redetermination of benefits, the Social Worker notifies the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the denial, termination, or reduction and documents the SSA decision, and completion of required notifications, in the electronic record.
26. The Social Worker and Supervisor review the reason for the denial, termination, or reduction and attempt to resolve the issue within the appeal period. The Area SSA Liaison, the Regional Social Security Benefits Coordinator, and/or the SSBU, will assist as needed.
27. If the issue is not able to be resolved, the Social Worker and Supervisor will appeal before the deadline. The Area Director/designee may approve a decision not to appeal. The Social Worker notifies the Department's attorney, the child's attorney, and the parent/guardian's attorney(s) of the Department's decision about whether to appeal. The Social Worker will document notifications in the electronic record.

Reporting changes to SSA

28. If the Department is serving as Representative Payee, the Social Worker will notify the local SSA office if there is a change which may impact a child's eligibility for benefits. Examples of changes which may impact eligibility include:
    - Changes to a child's income (e.g., if the child starts or stops employment);
    - Changes to a child's savings (e.g., if a child opens a bank account); or
    - Changes to a child's living arrangements (e.g., if a child is placed outside of the 50 U.S. states, or in a non-referral location such as a hospital setting).

    (For questions about reporting responsibilities, or specific changes which may impact a child's eligibility, please visit the SSA's website or contact the Area SSA Liaison.)

E. Procedures: PERSONAL NEEDS ALLOWANCE (PNA) ACCOUNTS AND ACHIEVING A BETTER LIFE EXPERIENCE (ABLE) ACCOUNTS

When the SSA determines that a child in the Department's custody is eligible for SSA benefits, and appoints the Department as the Representative Payee, the Department will open a Personal Needs Allowance (PNA) account and, for a child receiving SSI, an Achieving a Better Life Experience (ABLE) account. SSA funds will be received from the SSA into the PNA account, and for children receiving SSI, balances will be transferred to the ABLE account when the PNA account balance approaches its maximum to ensure continued eligibility for SSI benefits. The balances of both accounts will be monitored in the electronic record, and funds will be spent on the recipient as needed.

Creating and Funding Accounts

1. Interest-bearing PNA accounts will be created for each child upon receipt of the first benefit payment. An ABLE account will also be created for each child receiving SSI, as appropriate. The SSBU enters the SSA eligibility and PNA/ABLE account information in the child's electronic record. The Department maintains accounting information for each account created on behalf of a child receiving benefits.
2. The SSBU notifies the Social Worker when the PNA accounts are created.
3. In cooperation with the Social Worker, Area SSA Liaison, and/or the Regional Social Security Benefits Coordinator, the SSBU completes and submits ABLE account applications for each SSI-eligible child and notifies the social worker when the ABLE account has been created.
    - SSA funds will be received into the PNA account. For SSI-eligible children, when the PNA account approaches its targeted maximum, funds will be transferred into the ABLE account to ensure the child continues to remain eligible for SSI benefits.
4. If the child receives retroactive benefits, those funds will be kept in a dedicated account if required by SSA. Funds in a dedicated account can be used for medical treatment, education, job skills training, and expenses associated with an impairment, such as personal needs assistance, special equipment, housing modification, therapy, rehabilitation, or other items and services related to the impairment. The Social Worker should discuss any questions regarding the appropriate use of funds from a dedicated account with the Area SSA Liaison.

Use of Account Funds

5. The Social Worker, with the placement resource's, family's, and/or child's input, identifies the child's current and foreseeable needs (e.g., tangible items such as toys, books, electronics, and clothing; enrichment/extracurricular activities; and assistive technology and communication devices). These discussions should take place during meetings with the placement resource, family, and/or child, (e.g., Family Time visits, home visits, placement visits, Quarterly Placement Reviews), and Foster Care Reviews.
6. When submitting the request, the Social Worker will determine whether the purchase would ordinarily be funded by the Department or another source. If another funding source might be more appropriate, the Social Worker will explore whether it can provide funds. If the source can meet the child's needs, the Social Worker will request the funds. If the request falls within acceptable use of funds for PNA/ABLE accounts, the child's PNA/ABLE funds may be used.

7. All purchases using PNA/ABLE funds must be for the use of the child. Any non-consumed items purchased with funds must accompany the child if placement changes. Funds may not be utilized for custodial care costs by the placement resource (e.g., babysitting, respite, basic clothing).
8. All requests for disbursement that will use ABLE account funds must meet the definition of Qualified Disability Expenses (QDEs) as defined by federal law. QDEs include expenses related to education, housing, transportation, employment training and support, assistive technology and related services, personal support services, health, prevention and wellness, financial management and administrative services, legal fees, funeral and burial, and basic living expenses.

Accounting Information

9. The Social Worker provides the child, if 14 years old or older, with financial information about their eligibility for benefits, as well as the existence, amount, availability, past use and limitations of funds conserved for the child on a periodic basis (e.g., at placement visits, Foster Care Reviews, Permanency Hearings, etc.). Conversations should occur at a level that is clinically and developmentally appropriate for the child, considering their individual needs (e.g., their communication skills/style, any disabilities, and any language access needs). The Social Worker will document the provision of ongoing financial information in the electronic record. The child's attorney has direct access to accounting information through the attorney portal.
10. For children 17 years or older, the Social Worker also provides the child with basic guidance on and assistance with understanding budgeting and money management, including checking and savings accounts. (For more information on financial literacy, see below Procedures F: Support Adolescents in understanding their SSA Benefits.)

Reports to the Court

11. The Social Worker will provide accounting information to the court. This information must be provided in Permanency Hearing reports. The court may also request accounting information at other times, including as part of reports required for other proceedings.

Request Disbursements

12. The Social Worker submits a request for a disbursement from the child's PNA/ABLE accounts through the electronic record. The request must be approved by the AAM, the SSBU, and chief financial officer/designee.
13. Upon review and approval of the request, the SSBU will process the disbursement if the account, or combination of PNA/ABLE accounts, can provide adequate funds to fulfill the child's request.
14. Funds may be disbursed only to a state-approved vendor (e.g., foster parent, kin, residential services provider, Guardian Ad-Litem, child's attorney, etc.).
15. Funds may only be disbursed to Commonwealth staff if approved by the Commissioner/designee in extraordinary circumstances (e.g., an individual is in a hospital or other non-referral location, and all other options are unable to receive the disbursement and make the purchases on behalf of the individual).

Verify Purchases and Obtain Receipts

16. Although recommended for all disbursements, the placement resource must obtain and submit receipts for all disbursements totaling $100 or more to the Social Worker. Examples of allowable receipts may be found in the Department's definition for "acceptable documentation" (see definitions section above).

The Social Worker:

- Verifies that the disbursement was spent on items specified in the disbursement request;
- Follows up with the placement resource about any missing receipts or discrepancies; and
- Scans and uploads a legible copy of receipt(s) into the child's electronic record.

If funds cannot be spent on the item(s) specified in the approved disbursement request, or if the child's needs or the cost of the item changes, the placement resource must return any unexpended funds totaling $20 or more to the AAM within 30 days. The placement resource will receive notice with the disbursement to use any unexpended funds totaling less than $20 on the child's personal needs.

F. Procedures: SUPPORTING ADOLESCENTS IN UNDERSTANDING THEIR SSA BENEFITS

Financial Literacy

1. The Department will work with children who receive SSA benefits to help them learn financial literacy skills and understand their benefits. Children will be educated on the types of benefits they receive, how to maintain these benefits, accounts that are already established for their benefits (including account balances), acceptable use of funds, and how to manage their federal benefits when they leave Departmental care. Financial literacy education includes but is not limited to: budgeting; money management; informed decision-making; banking, checking and savings accounts; credit card counseling; managing debt; planning for financial security and stability; financing post-secondary education or training; long term asset-building; and community and agency services.
2. This planning and education will begin when a child in the Department's care turns 14 years old. The information may be provided by the ongoing Social Worker, placement resources, clinical providers, and/or Adolescent Outreach Workers. Conversations should occur at a level that is clinically and developmentally appropriate for the child, considering their individual needs (e.g., their communication skills/style, any disabilities, and any language access needs).
3. Efforts toward educating children about their benefits and financial literacy will be documented in the electronic record.

G. Procedures: CLOSING AND TRANSITIONING ACCOUNTS

As the child moves toward their permanency goal, ongoing conversations continue to take place about the appropriateness of the Department serving as Representative Payee (e.g., during Foster Care Reviews, updates to the Family Assessment and Action Plan, Permanency Planning Conferences, Permanency Hearings, Reunification Readiness Reviews, Youth Readiness Assessments, and other transition meetings for children). When the Department anticipates that it may stop serving as the child's Representative Payee, the Department will begin planning for activities to close accounts and transition responsibility to other parties, as appropriate.

Transition of Representative Payee

1. The Department should plan for the transition of Representative Payee status before:
    - The child leaves the Department's care and/or custody (e.g., returns home, adopted, custody to another individual/agency)
    - The child turns age 18 or older and seeks direct payment of benefits;
    - The Department determines it is in the child's best interest for someone else to be the child's Representative Payee and the SSA appoints another Representative Payee; or
    - SSA determines it is not in the child's best interest for the Department to manage any conserved funds.
2. Planning for the transition of Representative Payee status, along with the closing of a PNA account and/or transition of ABLE account management is reviewed and documented during regular supervision and may be reviewed as a part of:
    - Updates to the Family Assessment and Action Plan;
    - Foster Care Reviews;
    - Permanency Planning Conferences;
    - Permanency Hearings;
    - Reunification Readiness Reviews;
    - Youth Readiness Assessments; and
    - Transitional planning meetings for children.

Process PNA Account Closeout

3. When the Department anticipates that it may stop being child's Representative Payee, the Social Worker and their Supervisor discuss a plan to initiate the closing of the PNA account in the electronic record. A child's clinical case may not be closed until the PNA account closing has been initiated.
4. The SSBU receives notification through the electronic record of the request to close the PNA.
5. Prior to the date the child leaves the Department's care or custody, the SSBU reconciles the child's PNA account and sends any conserved funds to SSA.
6. In rare circumstances, the SSA may allow direct payment of conserved funds to a child or other individual, who is approved by SSA as the new Representative Payee of record. In consultation with the Social Security Benefits Manager/designee, a determination is made whether to pursue direct transfer from SSA. If it is determined that direct payment will be requested, the Social Security Benefits Manager submits the request to SSA.
    - If approved by the SSA, DCF Accounting will enter the new payee as a vendor, if needed.
7. Any funds received after the child has left the Department's care or custody or the PNA closes will be returned to SSA.
8. The Social Worker provides information to the child's parent(s)/guardian(s) about how to apply to SSA to become the Representative Payee for their benefits.
9. The Social Worker provides information about the child's benefits, about the purpose of the funds to be used or conserved for the child's present and future

personal needs, and reviews the penalties outlined by SSA for failure to follow these requirements to:

- the child's parent(s)/guardian(s) and/or new Representative Payee; or
- the child who is turning age 18 (including those who are making plans to sustain Department connection).

10. For children turning age 18 who choose to have a sustained connection with the Department, the child, in consultation with the Department, decides if they will apply for direct payment of their SSA benefits.
11. For children turning 18 who choose to have the Department to remain Representative Payee, the Social Worker will document consent in the electronic record.
12. For children turning age 18 who choose not to have a sustained connection with the Department, the Social Worker provides information about how to apply to SSA to receive direct payment of their benefits.
13. With the consent of either the new custodian, or the child who is turning age 18, the Social Worker may provide SSA with the child's current contact information.

Support Transfer of ABLE Account Management

14. When the Department anticipates that it may cease to become the child's Representative Payee, the Social Worker and their Supervisor discuss a plan to address the transfer of ABLE account management before the child has left the Department's care or custody.
15. The Social Worker:
    - Assists the child/family with identifying a new Representative Payee.
    - Determines if the child/family wants to keep the ABLE account by transferring account management.
        - If the child/family wants to keep the ABLE account, Social Worker completes the required transfer paperwork, with the assistance of the Area SSA Liaison, and submits to the SSA and SSBU.
        - If the child/family does not want to keep the ABLE account, the Social Worker communicates this to the Area SSA Liaison and the SSBU. The SSBU will treat the ABLE account funds as conserved funds and return them to the SSA.
    - Provides information to the child's parent(s)/guardian(s) and/or new Representative Payee, or to the child who is turning age 18 (including those who are making plans to sustain Department connection), and the child's attorney about the ABLE account and QDEs.
    - If the child is reunifying, the Social Worker ensures that the family is informed about the child's benefits, about the purpose of the funds to be used or conserved for the child's present and future personal needs, and reviews the penalties outlined by SSA for failure to follow these requirements.
16. The SSBU/Central Office:
    - Assists the Social Worker with helping the child/family transfer management of the ABLE account, as needed.

- Works with the ABLE administrator to transfer the management of the account to the new Representative Payee or designated beneficiary, if appropriate, OR to close the ABLE account if the child/family no longer wishes to maintain the account.

Appendix A: Table of Notifications Provided by Social Workers

(Notes: Attorneys for the child, parent/guardian(s), and the Department will have direct access through the Attorney Portal. If parental rights have been terminated or a guardianship has ended, the Social Worker does not notify the attorney for that parent/guardian.)

Per this Policy, Social Workers are responsible for sending and documenting the following notifications related to SSA Benefits:

Notification Type	**Recipients**	**Time Fame**
Notice when the Department decides to apply to be Representative Payee. *(See pg. 7, #11)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When an SSA-11 Application (Request to be Selected as Payee) is submitted that indicates the Department is applying to the Representative Payee.
Notice when the Department applies for SSA benefits on behalf of the child. *(See pg. 7, #14)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When SSA Benefit Application is submitted.
Receipt of Notice of SSA benefit decision, or other notices requiring appeal. *(See pg. 7, #15)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When SSA notice is received which awards, denies, terminates, or reduces benefits.
Notice of the Department's decision to appeal (or not appeal) a denial, termination, or reduction of benefits. *(Applies to initial denial, denial following a CDR, or other reduction or termination of benefits.)* *(See pg. 7, #18)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When the Department decides whether to appeal or not appeal.
Notice of SSA hearing (if required), including the date and time of the hearing. *(See pg. 7, #19)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When Social Worker becomes aware that an SSA hearing is scheduled.
Notice of SSA appellate decision. *(See pg. 7, #21)*	Department Attorney(s), Child's Attorney, and Parent/Guardian's Attorney(s).	When Social Worker receives a decision from SSA following an appeal.