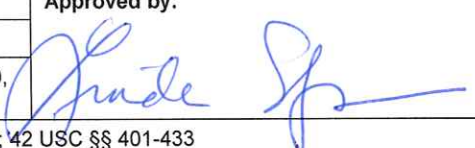


DCF	COMMONWEALTH OF MASSACHUSETTS ~ DEPARTMENT OF CHILDREN AND FAMILIES	
	Policy Name: SSI and RSDI Child Benefits Policy	
	Policy #: 84-007	Approved by:
	Effective Date: 1/1/1985	
	Revision Date(s): 11/16/1987, 7/1/1989, 10/1/1990, 2/10/1998, 7/8/2008, 12/3/2018	
	Federal Legal References: 42 USC §§ 1381-1383f; 42 USC §§ 401-433	
Massachusetts Legal References: 110 CMR 4.01-4.15		

NOTE: Throughout this policy, the terms "child" and "children" are used as general and inclusive terms to mean a child/youth/young adult from birth up to age 23, including young adults who receive support payments.

SSI and RSDI CHILD BENEFITS POLICY

Table of Contents

I. Policy	2
II. Procedures	2
A. Definitions	2
B. Roles and Responsibilities	3
C. Procedures: Assigning Area SSI/RSDI Liaison	4
1. Designate Area SSI/RSDI Liaison	4
D. Procedures: Obtaining and Maintaining Benefit Eligibility	4
1. Review Case Record for Eligibility	4
2. Apply for SSI/RSDI and/or Representatives Payee Status	5
3. Complete Continuing Disability Reviews	5
4. Appeal an SSA Decision	5
E. Procedures: Accessing Personal Needs Allowance (PNA) Account	5
1. Create Child's PNA Account	5
2. Identify Child's Needs	5
3. Request PNA Disbursement	6
F. Procedures: Retaining Receipts and Returning Unspent PNA Funds	6
1. Verify Purchases and Retain Receipts	6
G. Procedures: Communicating About PNA Accounts	6
1. Respond to Balance Notifications	6
2. Respond to Correspondence	6
3. Respond to Ad Hoc Requests	6
H. Procedures: Closing PNA Accounts	7
1. Process PNA Closeout	7
2. Support Transition to New Representative Payee	7

I. POLICY

It is the policy of the Department of Children and Families (“the Department”) that:

- Supplemental Security Income (SSI) and Retirement, Survivors and Disability Insurance (RSDI) applications are filed on behalf of every potentially eligible child in substitute care, and
- these benefits be used for the child's personal needs and to support the cost of substitute care.

For children in the Department's custody the Department applies to become the representative payee, unless the Department determines that it is in the best interest of the child for the child's parent(s)/guardian(s) to be the representative payee. The Department also considers who should file on behalf of a child who is placed in substitute care pursuant to a Voluntary Placement Agreement. Social Security Administration (SSA) may prefer to designate the parent(s)/guardian(s) as representative payee if she/he demonstrates a strong interest in the child's well-being, visits regularly, and/or reunification is planned within one year. For young adults, the Department and the young adult should jointly decide who will apply for the benefit. Ultimately SSA determines who will be the representative payee for the child or young adult.

The Department recognizes its fiduciary responsibility when it is designated by SSA as the representative payee on behalf of a child in its care or custody. The Department uses the monthly benefit to cover the cost paid to the child's placement provider for the child's care and maintenance and to cover the costs of other needs of the child allowable by SSA that are not covered by the payments to the placement provider.

No disbursement to the Department will exceed the actual cost of the child's care and maintenance. The Department will monitor the accrued benefit balance to keep the account balance of an SSI recipient child below the maximum established by SSA.

II. PROCEDURES

A. DEFINITIONS

Continuing Disability Reviews (CDRs) – Periodic reviews by SSA of the cases of children receiving SSI benefits to determine if beneficiaries still meet the medical 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 designated portions of the child's SSI/RSDI monthly benefits and is to be used for the child's personal needs.

Placement Resource – The contracted provider of residential services or comprehensive foster care services, or a Departmental kinship, foster/pre-adoptive, or child-specific family resource.

Retirement, Survivors, and Disability Insurance (RSDI) – This benefit type, also known as “Title II”, is available for children who have a parent who is either deceased or disabled and who was a wage earner.

Revenue Management Unit (RMU) – The unit that supports the SSI and RSDI child benefits and other revenue programs administratively.

Social Security Administration (SSA) – The division of the U.S. Department of Health and Human Services that administers the Social Security Act, including SSI and RSDI child benefits.

Supplemental Security Income (SSI) – This benefit type, also known as Title XVI, is available for children who are disabled and do not have assets that exceed \$2,000.

State Approved Vendor – A placement resource who has been approved as a vendor to whom the commonwealth can issue payments on Massachusetts Management Accounting Reporting System (MMARS).

B. ROLES AND RESPONSIBILITIES

Social Worker is responsible for:

- engaging with families and children to identify children who may be eligible for SSI or RSDI benefits and determine who should apply;
- completing and submitting to SSA applications for benefits and/or representative payee status for children and young adults when determined to be in their best interest;
- identifying children's personal needs and managing requests for disbursements from their PNA accounts, including notifying the RMU to close the account when the child leaves Department care or custody or the Department will no longer be the representative payee; and
- responding to SSA requests for information, including periodic Continuing Disability Reviews.

Supervisor is responsible for supporting the Social Worker in activities to:

- identify potentially SSI or RSDI eligible children, determine who should apply, and complete SSA applications for benefits and/or representative payee status; and
- manage children's PNA accounts, including the determination that the Department should no longer be the representative payee and the account should be closed.

Area SSI/RSDI Liaison is responsible for:

- supporting social work staff in obtaining and maintaining SSI and RSDI child benefits; and
- coordinating and monitoring activities related to PNA accounts on behalf of eligible recipient children in Department care or custody.

Area Administrative Manager (AAM)/designee is responsible for

- reviewing and approving PNA account requests; and
- collecting from the placement resource and returning to the Chief Financial Officer/designee any unexpended funds over \$20.

Area Program Manager (APM)/designee is responsible for

- supporting area SSI/RSDI Liaison and area supervisors in maintaining SSI and RSDI child benefit; and
- providing management support to the area office to help resolve PNA account-related matters.

Placement resource is responsible for:

- supporting the identification of children's special needs;
- maintaining and forwarding to the Social Worker receipts for PNA disbursements totaling \$100 or more;
- returning any unexpended funds totaling \$20 or more to the AAM; and
- ensuring that children's non-consumed items purchased with PNA funds accompany them when their placement changes.

Area Director is responsible for:

- designating the Area SSI/RSDI Liaison; and
- monitoring activities related to obtaining and managing SSI and RSDI benefits for potentially eligible children.

Revenue Management Unit (RMU) is responsible for:

- supporting management of PNA funds by notifying Social Workers when the account balance is approaching the \$2,000 asset limit established by SSA; and
- forwarding to the Social Worker correspondence and requests received from SSA.

C. PROCEDURES: ASSIGNING AREA SSI/RSDI LIAISON

**Designate Area
SSI/RSDI Liaison**

1. The Area Director shall designate an individual to be the Area SSI/RSDI Liaison to monitor benefit activities, including but not limited to:
 - supporting the preparation of applications
 - providing technical assistance to social work staff as needed;
 - serving as the Area Office's single point of contact for the RMU, SSA, and Central Office staff regarding SSI/RSDI;
 - coordinating distribution of Continuing Disability Reviews (CDRs) for completion;
 - monitoring PNA account balances; and
 - assisting in the collection and maintenance of receipts for PNA disbursements.

D. PROCEDURES: OBTAINING AND MAINTAINING BENEFIT ELIGIBILITY

**Review Case Record
for Eligibility**

1. During the first 6 weeks after each child enters substitute care, the Social Worker, in consultation with the Supervisor, reviews the completed family assessment and action plan, Medical Passport data and other case record information to identify consumer children who:
 - are current SSI/RSDI recipients, and/or
 - may have physical and/or psychological impairments (see <http://www.ssa.gov/benefits/disability/>), or
 - have a parent who has a disability or is deceased and was a wage earner.

The identification of a potentially eligible child may occur at a later time if the child's circumstances change or new information is obtained.

The Social Worker documents the results of the review in the electronic case record and informs the Area SSI/RSDI Liaison when a potentially eligible child is identified.

Apply for SSI/RSDI and/or Representative Payee Status

2. The Social Worker completes and files the necessary applications for benefits and/or representative payee status with SSA. The Social Worker may consult with the Area SSI/RSDI Liaison for specific technical assistance in completing SSA forms and shall notify the area SSI/RSDI liaison after applying.

Special circumstances may apply:

- **For Voluntary Placement and Child Requiring Assistance Custody Cases:** The Social Worker shall obtain the parent(s)/guardian(s) written consent.
- **For Young Adults:** The Social Worker shall seek consent from and provides written notification to the young adult.
- **For Child Whose Parent/Guardian is Representative Payee:** When the Social Worker, in consultation with the Supervisor, determines that it is in the best interest of the child for the child's parent(s)/guardian(s) to be (or remain) the representative payee, the Social Worker notifies and supports the parent(s)/guardian(s) to complete and file the necessary applications with SSA, if needed, and documents that the parent will remain the payee in the electronic case record.

The RMU receives and forwards the SSA notification of benefit award and/or representative payee status to the Area SSI/RSDI Liaison and the Social Worker. The Social Worker who has questions about the status of a child's application may contact the local SSA office.

Complete Continuing Disability Reviews

3. The RMU receives and will forward to the Area SSI/RSDI Liaison SSA requests for Continuing Disability Reviews (CDRs) as received from SSA.

The Social Worker completes the CDR packet with the assistance of the SSI/RSDI Liaison and the placement resource, as needed, and returns the packet within the requested time frame to the RMU who submits it to SSA.

Appeal an SSA Decision

4. Upon receipt of a notice of denial of benefits via the RMU, the Social Worker, in consultation with the Supervisor and Area SSI/RSDI Liaison, determines whether or not to file an appeal; if yes, the Social Worker files the appeal with SSA. If an SSA hearing is required, the Social Worker attends the hearing.

E. PROCEDURES: ACCESSING PERSONAL NEEDS ALLOWANCE (PNA) ACCOUNT

Create Child's PNA Account

1. Upon receipt of the first benefit payment, the RMU enters SSI/RSDI eligibility information and creates a PNA account in the child's electronic case record.

Identify Child's Needs

2. The Social Worker, in ongoing discussions with the placement resource, family, and/or child, identifies the child's personal needs, e.g., swim lessons, music classes, toys, books, electronic devices, prom clothing, camp, etc. These discussions should take place during Family Assessment and Action Planning meetings, or in other meetings with the placement resource, family, and/or child.

NOTE: All purchases must be for the personal or recreational use of the child. Any non-consumed items purchased with PNA funds must accompany child if placement changes. PNA funds may not be utilized for custodial care costs by the placement resource (e.g., babysitting, respite, basic clothing).

**Request PNA
Disbursement**

3. The Social Worker submits a request for a PNA account disbursement(s) through the electronic case record. The request must be approved by the Area Administrative Manager (AAM), the RMU, and the Chief Financial Officer/designee. PNA funds may be disbursed only to a placement resource who is a state-approved vendor (e.g., foster parent, residential services provider, etc.). PNA funds cannot be disbursed to Department staff.

F. PROCEDURES: RETAINING RECEIPTS AND RETURNING UNSPENT PNA FUNDS

**Verify Purchases and
Retain Receipts**

1. Although recommended for all disbursements, the placement resource must obtain receipts for all PNA disbursements totaling \$100 or more and forward to the Social Worker.

The Social Worker:

- verifies that the disbursement was spent on items specified in the PNA 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 case record.

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

G. PROCEDURES: COMMUNICATING ABOUT PNA ACCOUNTS

**Respond to Balance
Notifications**

1. The RMU notifies the Social Worker that the child's PNA account balance is approaching the asset limit set by SSA.

The Social Worker works with the child and the placement resource to determine a specific item(s) for which the funds will be spent.

**Respond to
Correspondence**

2. The RMU forwards correspondence and requests received from SSA on behalf of the child to the Social Worker.

The Social Worker provides information to SSA and/or the RMU upon request.

**Respond to Ad Hoc
Requests**

3. The Social Worker responds to ad hoc requests (e.g., troubleshooting PNA account suspensions, overpayments, or other account management issues; and internal and external audits/reviews) from SSA, RMU and other Department staff, and the Executive Office of Health and Human Services for documentation and/or information related to the child's PNA account.

H. PROCEDURES: CLOSING PNA ACCOUNTS

Process PNA Closeout

1. The Department ceases to be the child's representative payee when:
 - the child leaves the Department's care and/or custody (e.g., returns home, adopted, custody to other individual/agency, or is age 18 or older and leaves care); or
 - the Department believes it is in the child's best interest for someone else to be the child's representative payee or for SSA to close the child as a recipient.

The Social Worker submits a PNA Closeout Request in the electronic case record when the child leaves DCF care or custody or upon receiving confirmation that SSA has approved the change of representative payee.

The RMU is notified of the PNA Closeout Request through the Department's electronic case record system.

The RMU reconciles the child's PNA account and sends any conserved funds and/or checks received after the placement ends to SSA.

Support Transition to New Representative Payee

2. The Social Worker provides information to the child's new custodian, or to the youth who is turning age 18 (including those who are making plans to sustain Department connection), about how to apply to SSA to become the representative payee, and encourages that individual to apply. In rare situations when a young adult sustains Department connection, it may be in the best interests of the young adult for the Department to remain the representative payee.

With the consent of either the new custodian, or the youth who is turning age 18, the Social Worker may provide SSA with the child's current contact information.