

FUNDS

OVERVIEW

Once an eligibility determination has been made and support and funding levels have been decided, regionally-based offices are responsible to ensure that funds are managed and monitored in accordance with the MCSS service principles and these Guidelines. This subject includes information about administration of funds and the monitoring role:

The subject is divided as follows:

- Principles
- Administration
- Funding Management
- Standards
- File Review Indicators

REMINDER: Refer to Glossary for all definitions

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PRINCIPLES

Funds management and administration should reflect the content and intent of the Ministry's and SSAH service principles and these Guidelines, which inform and guide all aspects of SSAH program delivery.

Administrative procedures and monitoring must ensure responsibility and accountability while recognizing the uniqueness of the situation of each applicant. Procedures and decisions should demonstrate flexible and equitable approaches within administrative parameters.

ADMINISTRATION

General

Regionally-based offices determine the most effective and efficient method of administering their SSAH allocations. Whatever the mechanism, it is important that processing reflects the principles outlined in these Guidelines. Specific processing information is available in the financial administration manuals used by MCSS.

Individual Contracts

Once decisions have been made as to eligibility and support levels, the contract (decision letter/authorization/agreement) needs to clearly state the key elements of the approval so that all parties may understand the process and its limits. The document(s) should include:

1. What service has been approved (i.e. personal development and growth or family relief and support).
2. The amount that has been approved.
3. Rationale that explains why a decision differs from the request, if that is the case.
4. The time period for the authorization.
5. Information about how the funds will be administered (i.e. agency administered or self-administered). A rationale should be provided, if the decision regarding the method of administration differs from requested preference.
6. Processing information.
7. A description of the review process.

Contract Administration

The concept of individualized funding and consumer-directed funding fits with the SSAH program philosophy. It provides the individuals and families with the opportunity to state a preference as to the party that should receive and manage the approved funding. It could be the family, an agency or another third party.

When the individuals and families choose to manage approved SSAH funds, it is generally referred to as SELF-ADMINISTRATION.

Self-Administration

Management by individuals and families may be beneficial because:

- Families can use the full amount of funding authorized to them to purchase services without paying an administrative fee to have their funding managed by a third party. Thus, the amount of service that can be purchased within the funds approved is maximized.
- Individuals and families have the ability to directly control service delivery.
- Service can be readily customized and adapted to fit ongoing opportunities and needs.

Families or individuals who choose to self-administer should be informed of sources of advice they can access regarding the potential legal responsibilities and liabilities associated with self-administering their contracts.

Individuals/families should contact any relevant agency/organization for further information about their responsibilities as a result of their choice to administer their funding. These may include organizations such as:

- **Canada Revenue Agency (CRA)**
- **Ontario Ministry of Labour**
- **Workplace and Safety Insurance Board (WSIB)**

Agency Administration

Agency management may be beneficial due to:

- The type or complexity of the service being delivered.
- The need for supports to workers, such as replacements for an absent worker, supervision, recruitment, training and liability insurance.
- The relief provided to families by administering the funding for them.

If an agency charges an administrative fee, that amount will come out of the approved funding which will mean a reduced amount of available funding for direct service. Any administration fee should be clearly identified on the authorization.

Note:

Funds allocated to SSAH should not be used to supplement or replace base funding for transfer payment agencies. Funds should not be transferred from SSAH to create base programs.

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Exceptional Circumstances

While staff who deliver SSAH should respect the preference stated on the application, alternative arrangements for administration of funds may be made when:

- There is a history of operational difficulties, or
- The family and Ministry agree the amount approved is too large for the suggested party to manage.

If this is the case, the regionally-based office should:

- Work with the family to identify alternative arrangements.
- Include the rationale for approving a different party in the decision letter.

Administrator Responsibilities

Whether the contract is self-administered or administered by a third party, responsibilities remain the same. The party administering the SSAH contract must be aware of their roles and responsibilities. These include:

- Understanding and fulfilling human resource obligations under the applicable laws.
- Acquiring the appropriate human resources.
- Maintaining program and financial records.
- Retaining financial records for 7 years.
- Completing claims regularly, including invoices and proofs of delivery.
- Ensuring appropriate liability coverage.
- Notifying SSAH delivery staff of any serious incident arising in the course of program delivery.
- Completing progress reports with the family as required.
- Any other responsibilities that may arise by virtue of law or policy.

Compensating Family Members

Primary caregivers can use their SSAH funding to compensate eligible family members (except those prohibited listed below) to provide services for personal development and growth and/or family relief and support.

Individuals who are **not** eligible to receive compensation are:

- Primary caregivers regardless of residence;
- A child under the age of 18;
- Spouse of the individual who has a developmental disability regardless of residence.

For example, while a sibling over the age of 18 may be paid using SSAH funding to provide respite or to teach new skills, a child under the age of 18 could not be compensated using SSAH funds. A grandparent living in the same house as a parent and an individual requiring support could be compensated with SSAH funds to provide support. However, if the grandparent is the primary caregiver of the individual requiring support they cannot be reimbursed using SSAH funds. In addition, the spouse of a primary caregiver is considered to be a primary caregiver themselves.

Combining Funds

To provide greater flexibility of choice and to assist individuals and families to meet their needs, families may combine their allocation with one or more individual(s) or family(ies). Rules related to administration, accountability, record-keeping and monitoring of funds remain the same. Families/primary caregivers (or the transfer payment agency, if they are administering the funds on behalf of families/caregivers) remain responsible for providing the required financial information related to the submission of receipts, billing and invoicing, based on individual allocations.

Cost of Administration

Administration costs for SSAH must be consistent with MCSS policy on Administration.

FUNDING MANAGEMENT

Accountability for management of funds is the joint responsibility of MCSS, the individual, families and, where applicable, the administering agency. A key feature of this accountability is monitoring the effective management of funds.

Monitoring

Monitoring determines whether what was agreed to has happened within the parameters of these Guidelines. The standard against which individual SSAH agreements are monitored is the actual contract – usually the application form, decision letter, authorization or service contract.

The approval indicates what has been agreed to:

- What service has been approved (i.e. personal development and growth or family relief and support).
- At what cost.
- Within what time period.
- To be administered by whom.

The records indicate what has happened through:

- Claims or invoices
- Payments
- Proof of delivery

Invoices should be honoured when they are submitted in good faith and supported by documentation, provided:

- The services were the type authorized.
- The service occurred during the period authorized.
- The total amounts invoiced do not exceed the amount authorized for that period.

When the actual utilization of SSAH resources differs significantly from the approval, it is appropriate for staff who deliver SSAH to monitor the situation.

This may include:

- Contacting the family and/or case manager to explain the original basis for the approved funding.
- Verifying that the services are eligible or not eligible for funding under SSAH.
- Conveying the expectation to the family that the funds will be used for the purposes for which they were intended.

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Factors which may indicate the need for monitoring include:

- Irregular pattern of usage where closely defined goals and delivery plans have been developed by a professional.
- Special services worker performing functions normally provided by mainstream programs.
- Majority of approved funds claimed at beginning of 12 month approval.
- Requests for additional support prior to the end of the contract.
- Unauthorized items being submitted for payment.
- Special services worker complaints of delays in payment.

If concerns arise about potential mismanagement of funds, staff delivering SSAH should immediately consult with local management staff.

Note:

A regular billing procedure must be established and followed. Staff should analyze the use of funds periodically and may contact individuals who have not used their approved funds.

Ongoing or regularly scheduled monitoring is essential for good management. Random sampling of files should be conducted regularly over time. Further information on monitoring can be found in the **Accountability and Evaluation section**.

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Other Considerations

Over-expenditures:

- The lesser of \$200.00 or 10% of the total authorized amount may be billed as an over-expenditure without having to issue a new contract (authorization or decision letter).
- Such an invoice should be directed to the staff who initially authorized the expenditure to ensure that person is in agreement with paying the additional amount.
- A short memo of understanding should be attached to the invoice to note the reason for the over expenditure (price increase, need for additional service, etc.)
- If the over-expenditure exceeds the limit, an amendment to the existing authorization must be made or a new authorization must be issued, if the regionally-based office or designated organization wishes to pay the over-expenditure. The Regional Director or delegate must authorize this type of change.

One-Time Requests:

- Some requests are on a one-time only basis. Some are for additional services for a short period of time, such as:
 - Greater needs related to illness or death of a family member.
 - Short-term service plan to address a specific goal for behaviour management or infant development activities.
- Staff must clearly communicate to applicants that these emergency or short-term enhancement approvals are being authorized on a one-time only basis AND that future funding will not be at the same level.

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Transfer of Service Commitment:

- When an individual moves from one region of the province to another, continuity of SSAH funding is important. The individual and/or the family should experience a similar level of support and not be placed on a waiting list during the transition period in the new community.

In order to enable continuity of funding, the following steps are taken:

The originating office:

- Will continue to pay invoices on the contract until the end of the original contract period OR for **6** months, whichever is **greater**.
- Will inform the receiving office at the time the family moves.

The receiving office:

- Will begin the contract review and renewal as early as possible.
- Will assist families in making appropriate linkages with other services in the community.
- Will meet the ongoing responsibility for providing service to the transferring clients within the existing SSAH allocation. New requests from the family will be considered on the same basis as other individuals and families at the time of contract renewal. When the request for renewal is reviewed, the principles of equitable decision-making will apply.

Process for Implementing Transfer of Service Commitment

In situations where the stipulation that the originating regionally-based office will continue to pay invoices on the contract until the end of the original contract period or for 6 months (whichever is greater) results in a period longer than the original 12-month contract, the following procedure will be followed:

- The originating region will continue to pay invoices on the original 12-month contract until that contract is finished.
- The originating region issue a new contract for the period beyond the 12-month contract to which the SSAH client is entitled. The amount of this contract will be calculated **on a pro-rated basis based on the previous 12-month contract**.

STANDARDS

Special Services at Home is committed to the goals of:

- Ensuring responsibility and accountability for SSAH funds.
- Enacting procedures and decisions that adhere to the service principles.
- Respecting the individual's and family preference regarding administration of funds.
- Providing information outlining responsibilities to the party administering funds.
- Regularly monitoring SSAH contracts against specified standard.
- Providing families with access to the approved funds at any point during the period authorized.
- Helping individuals and families who relocate to a new area of the province during the transition.

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FILE REVIEW INDICATORS

Analysis of administration and monitoring decisions should demonstrate that the SSAH service principles have been utilized, the Guidelines adhered to, and standards met.

Specific indicators include:

1. Decision letters and/or authorizations clearly define the key elements of each approval, including the service, rationale for the decision, amount of funds approved, time period, and the party administering funds.
2. The preference of the individual and/or family regarding the method of funding administration has been respected. The supplier named on payments and agreements should be the same as the preferred party on the SSAH application. Where an alternative has been used, there is documentation on file addressing the nature of the exceptional circumstance and a copy of the decision letter to the applicants noting the rationale for approving a different party.
3. Documentation shows that the party administering funds has been informed of the responsibilities in the role.
4. File analysis over time reveals monitoring of contracts as a regular occurrence. There is a demonstrated pattern of enquiries and follow up when use of SSAH resources differ significantly from the approved request.
5. Monitoring is performed objectively against the approval as a standard.
6. Analysis of decisions on invoice payments demonstrates that all invoices which meet the standard have been paid. Where this is not the case, there is documentation on file stating rationale for non-payment or reduced payment which addresses the criteria indicated in the standard.
7. Analysis of transferred files indicates continuity of service through administration of transferred contract and timely review for renewal.