

# **STATE MENTAL INSTITUTIONS (SMI) AND EDUCATIONAL VISITS: A DIFFERENT KIND OF RP REVIEW**

Presented by:

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# NOT THE TYPICAL PERIODIC

There are several types of cases that SSA may assign for completion. These assignments are somewhat different than the standard review you or your staff may be used to.

These are the:

- Quick Response Checks (QRCs)
- Educational Visits (EV)
- State Mental Institutions (SMI)

Although you may see some similarities between these and your normal reviews, each of these are their own special type of animal.



# QUICK RESPONSE CHECKS (QRCS)

A QRC is typically conducted in the same manner as a periodic review that you receive in your regular review cycle with a few exceptions:

1. Since a QRC is issued outside of a regular review cycle, RPMT should be checked on a weekly basis to ensure that the P&A manager assigns the case out promptly. These reviews take precedence over all other reviews with the expectation that they will be completed with a quick turnaround to determine if a more in-depth review is required by SSA (within 10 days of issuance).
2. When a QRC is issued due to the allegations of misuse, the financial record review period will encompass ***ALL*** months of the suspected misuse and ***ALL*** beneficiaries in the RP's care during the alleged period of financial misuse. Furthermore, all documents related to the potential misuse MUST be uploaded into RPMT.

# QRC – BEST PRACTICE

- Note: These reviews are typically issued when there is an allegation of misuse or some other concerning issue. (E.g. Florida guardians having a significant increase or decrease in beneficiaries within the last six months) While some of these concerning issues are automatically created by RPS, SSA maintains the discretion to determine if there were other conditions to reason a site review.



# **EDUCATIONAL VISITS (EV)**

# WHAT IS THE PURPOSE OF AN EDUCATIONAL VISIT?

- Review policies and procedures with the RPs,
- Ensure that RPs understand their duties and responsibilities,
- Ensure that RPs maintain accurate recordkeeping and reporting (*including reviewing the financial records of both the RP and some of the beneficiaries*), and
- Serve as an early detection of poor payee practices or misuse.

*Note: The findings of these visits may result in SSA initiating another type of review.*



# WHO GETS AN EDUCATIONAL VISIT (EV)?

- SSA has the authority to conduct an EV for *any* payee at *any* time they see it is needed.
- Typically, a payee is chosen if SSA determines that the RP is having difficulty in understanding their responsibilities and duties (*even if no misuse is suspected*).
- Also, ALL new fee-for-service (FFS) payees are required to receive an EV within their first six months.

Note: Although there is a certain amount of education that is given to payees during regular site reviews, the reviewer may recommend to SSA that an EV be completed in the future. (I.e. new ownership, new staff, etc.)

# EV PRE-CALL CHECKLIST

- Research the Payee, including on any state websites to determine licensing, oversight agency, additional phone numbers, etc.
- Check RPMT for any:
  - overdue accounting,
  - death overpayments,
  - collective account expiration dates,
  - review history,
  - prep comments,
  - initiation reason, and
  - any 'issues to review'.
- Notate selected beneficiaries and check for reconciliation sheets to ensure that there are at least 2 available (*Create issue if necessary*).

*Note: A beneficiary\* interview is not required. However, if a large or unusual expenditure is found, these expenditures MUST be confirmed with the beneficiary.*



# SCHEDULING EV REVIEW

Schedule date of visit according to BPD (*Same as regular site reviews with the following exceptions.*)

- Reinforce the purpose of the educational visit and that the visit is on behalf of the SSA (*SSA does not consider these site reviews*).
- Send appointment confirmation letter that includes a copy of SSA letter.

Note: Although no beneficiary interviews need to be scheduled, advise the payee that you *may* need to speak with beneficiaries on the day of the visit.

# DURING THE VISIT

- Provide a copy of SSA's Guide for Organizational Representative Payees (and/or web address)
- Interview RP (and staff) – *We have created our own 637EV form as a tool for the interview. This is for information gathering only and NOT to be uploaded into RPMT.*
- Collect licensing, bond, fee-for-service approval letters, current beneficiary list (with conserved funds balances) documentation and any other supporting documentation that needs to be uploaded into the RPMT.
- Review financial records for the selected beneficiaries and document on the reconciliation sheets. Note any large or unusual expenditures as these will need to be confirmed with the beneficiary.



# REPORTING MY EDUCATIONAL VISIT

- Report your findings on form SSA-5002 and upload this and any other documentation obtained during the visit into RPMT in the Case Documents tab under '4. CAP, Evidence, other'.
  - You may create a new folder in the Case Documents tab titled, "Completed SSA-5002" and upload your completed report there.
- Complete the review items in the Educational Visit Summary tab. Confirm each item as 'pass' or 'fail' making sure to enter a note in the 'Problems/Remarks' section for any review item that has 'failed'.
- Upload completed reconciliation sheets.

## REPORTING CONTINUED

- Add a brief description in the "Educational Visit Issues Findings" text field on the main properties page to address if any "issues to review" were resolved or still need resolution, any new issues, and if reviewer recommends 3 month follow-up or another type of review.
- Update fee-for-service section on the Main Properties Page, if applicable.

Note: If any beneficiary interviews were completed in order to confirm any large/unusual expenditures, notate response on form SSA-5002 and upload SSA 639 as evidence (if applicable).

- Complete Review Checklist



# EDUCATIONAL VISIT SUMMARY TAB

Properties	<b>Educational Visit Summary</b>	Beneficiaries	Review History	Issues	Processes	Audit Trail	Case Documents	A
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Case: Star Wealth Management - *Educational Visit Summary*

**+ Education Visit Summary**

Education Visit Type	Review Item	Confirm	Problems/Remarks
6 Month	Beneficiary funds are not held in an organization's operating account	✓ Pass	Enter notes here
6 Month	Beneficiary accounts are correctly titled and conserved funds are held in interest-bearing accounts that are insured under Federal or State law or are held by another acceptable method	✓ Pass	Enter notes here
6 Month	The payee's records identify the Social Security and/or SSI benefits received and the reasons benefits were disbursed	✗ Fail	Enter notes here
6 Month	If a FFS payee, the payee collects only the correct fee amount and did not collect a fee for payee services before receiving SSA's authorization	[--Select--]	
6 Month	Checks and receipts for expenditures (especially any large or unusual expenditures) made on the beneficiary's behalf are on file -- NOTE: If there are any large or unusual expenditures, the P&A grantee should verify the expenditure with the beneficiary	[--Select--]	
6 Month	The payee's records reflect a current balance	Fail Pass	
6 Month	Interest earned on collective and other bank accounts is credited to the beneficiary's account -- NOTE: Collective account titling issues should be referred to the RO for resolution		
6 Month	SSA has approved any collective account		
6 Month	For SSI recipients, account balances (and other countable resources) do not exceed the \$2000 SSI resource limit as of the first moment of the month		

**Save**

# WHAT IF THERE ARE DEFICIENCIES?

- After you have completed reporting your findings, add any deficiencies and create a CAP (if required).
- Make sure you create any necessary notifications and/or issues that may need to be brought to the RO's attention.

*The Final Report Package must be submitted within 10 business days from the date of the completion of the educational visit.*



# CAP IS COMPLETE, NOW WHAT?

- You will need to check the Review Dashboard tab prior to submitting for Final Review.
- Scroll down to the Corrective Action Plan Review (Educational Visit) section to see if the '3 Month Follow-up Required' cell is checked 'yes'.
  - If 'yes', follow procedure for follow-up review.
  - If 'no', proceed with submitting the Final Review.
- Note: The RO will decide if there is going to be a 3-month follow-up.

## 3 MONTH FOLLOW-UP REQUIRED

- Check the main properties page in the "Issue to be reviewed during follow-up" section to see what issues SSA would like to be reviewed during the follow-up visit.
- If a 3-month follow-up is required, new items will be displayed in the Educational Visit Summary tab. These will be completed after the follow-up review.
- Write a brief description of the findings from the follow-up review in the "Follow-Up Visit Findings" section on the Main Properties Page.

*Note: Create a second 'new appt' with the Appointment Type as "Payee Follow-up".*



# **STATE MENTAL INSTITUTIONS (SMI) REVIEWS**

# STATE MENTAL INSTITUTIONS (SMI) REVIEWS

- SMI reviews will occur at least once every three years at the physical location of the mental institution (or facility for the developmentally disabled).
- Determine if your State, a State Agency, or the Institution is the payee on the Main properties screen in RPMT.

*Note: If the state is the payee or stores records at their state office then the review will be conducted at both the state office location and the institution.*

- Since these reviews are not automatically created, the RO creates them as needed and they may appear in RPMT at any time so, be on the lookout!



# RPMT AND TYPES OF SMI REVIEWS

- RPMT will show different fields based on the type of payee:
  - Primary State Agency,
  - State Agency (subsidiary state agency),
  - Institution (institution-facility).

*This dictates who gets the notification letters, who is responsible for filling out the SSA-9584 BK, review location(s), and # of recons per beneficiary.*

- Please note that if the payee is a State Agency or Institution, there will be a separate section for State Details that includes the state contact info.
- SSA will also provide a copy of the last SSA-9584 form, the type of financial records stored at the payee and/or state, and the details of the last review.



# TIMELINES

- At least 2 months prior to proposed review:
  - Send notification to state
  - Response should be received within 3 weeks.
- Within three days of response:
  - Send notification to Contact at Institution
  - Response should be received within 2 weeks.
- Within 2 days of response:
  - schedule the review(s) and mail appointment confirmation notice(s) with the exact time and date agreed upon to the state and mental institution.



***\*Please see BPD and clearance package (pg 41) for details to be included in the notification letters as this will differ depending on if the state is the payee. (Include proposed month of review.)***



# WHO FILLS OUT THE SSA-9584?

State Mental Payee Information	
No previous SSA-9584 on file at the State <input type="checkbox"/>	Send the SSA-9584 to the State <input type="checkbox"/>
No previous SSA-9584 on file at the State Agency <input type="checkbox"/>	Send the SSA-9584 to the State Agency <input type="checkbox"/>
No previous SSA-9584 on file at the Institution <input type="checkbox"/>	Send the SSA-9584 to the Institution <input checked="" type="checkbox"/>
Visit the State <input type="checkbox"/>	

- This section of the Main properties screen tells the reviewer who to send the SSA-9584 to and if there is not a previous SSA-9584 on file.
- The prior SSA-9584 will be located in the Case Documents tab in the '6. Form SSA-9584' folder. *(This is also where you will upload the new SSA-9584 booklet.)*

# RECONCILIATION SHEETS, 1 OR 2?

- Only one reconciliation worksheet is needed, unless the review is being held at two separate locations then the reviewer will need to complete two separate reconciliation worksheets per a beneficiary.
- The location that actually receives the direct deposit of SSA funds MUST show the SSA benefit amounts in the receipt column and any expenditures from the bank account.
- The second worksheet will be used at the location that receives and distributes the personal spending funds.

Note: Please confirm that the amounts disbursed for PNA from the first worksheet matches the receipt of PNA in the second worksheet.



# ADD AS YOU GO!

- Make sure to enter the date the notification letter was sent to the state in the "Preparation Comments" section of the Main properties screen.
- Upload a copy of the notification letter in the Case Documents tab under the '4. CAP, Evidence, Other' folder.
- Update any contact information and create "issue" for any discrepancies.
- Upload documents received as response to the notification (e.g. new SSA-9584, current beneficiary list, list of beneficiaries not in physical custody with their present location, etc.).

Note: All states must receive a notification of the proposed review even if they are not the payee and/or the review will be at a different physical location. This notification must be sent at least two months prior to the month of the proposed review.

# **PRE-SITE VISIT CALL (SCHEDULING THE REVIEW)**

- Call state contact, complete previsit call (if applicable)
- Call SMI contact, complete previsit call
- Per BPD, keep a log of contacts attempts. If no response after two calls and one email, notify the NAG within 5 days.
- Note: Do not, under any circumstances, use email to discuss any beneficiary information or any other aspect of the review besides facilitating the scheduling of the review or determining logistics of gaining entry to the State office or institution.



## PRE-SITE VISIT CONTINUED

- Set date and time of review. If also visiting the state office, attempt to set reviews as close together as possible (preferably within 1-2 days).
- Address any logistical issues and entering the institution (or state office).
- Confirm receipt of completed SSA 9584.
- Confirm which records are housed at institution (versus state office, if applicable) and availability during the review.
- Explain the financial review portion of the visit, including what records need to be available and the 12 month review period.
- Advise that at least one staff member will need to accompany the reviewer while they tour the facility and attempt to interview each beneficiary in the sample.
- Provide beneficiary list *(Include this list with the appointment confirmation notice.)*.
- Request that they notify each beneficiary of the visit and that the reviewer would like to meet with them.

*Note: Upload appointment letter in RPMT.*

# PREPARING FOR THE REVIEW

Create your own review form:

- Each SMI review will have an extra set of questions that are developed from the reviewer's assessment of the prior and current SSA-9584BK booklets, and any problems identified in the last review by the RO (in RPMT).
- Add these questions to the list of interview questions needed to complete the summary report.

*Tip: Become familiar with the summary report to ensure the reviewer asks any pertinent questions and documents observations during the review.*



# SSA-9584-BK BOOKLET

- Go through both the prior booklet from the last review and the newly completed booklet and document any differences so that you can get an explanation from the payee.
- If Payee completes and submits Part B with a copy of the prior booklet, read through any changes documented in Part B and notate any questions the reviewer will ask Payee for clarification on.
- Even if the payee shows no changes, review the booklet and document any questions you feel are necessary for clarification purposes.

*Note: Any differences (if any exist) including the explanation from the payee as to why there is a difference will be documented on the summary report.*

# INTRODUCTORY MEETING

- Ask payee for a list of all staff in attendance, including their position titles.
- Provide a copy of the Privacy Act.
- Address the questions you developed from the differences found between the two SSA-9584 booklets (make sure to bring both copies) and any issues noted during the previous review.
- Go over all payee reporting responsibilities with an emphasis on reporting events to SSA accurately and timely (specifically reporting work and custody changes).

*Note: Make sure that staff is available to answer any questions or provide clarification on the financial records as you complete your reconciliation worksheets.*



# GOING ON TOUR

- While reviewing the financial records, make sure to notate any large or unusual expenditures for the beneficiaries.
- Work with the staff member to ensure that beneficiaries will be available during the tour (this will save time).
- During the tour, talk to staff members that are designated to help beneficiaries with making purchases and disbursing PNA. (Document names and titles)
- Observe and document how staff interact with each other and the beneficiaries.
- Document observations on the general appearance of the grounds and facility. (Types of buildings, cleanliness, quality of maintenance, freedom of movement, safety, etc.)

# BENEFICIARY INTERVIEWS

- We have put together a beneficiary interview form to help the reviewer obtain the answers needed to complete a summary paragraph on each beneficiary in the review for the summary report.
- If a beneficiary is medically inadvisable to visit, document the reason why.

**Important:** If staff refuses to allow the beneficiary visits to occur, continue the review and create an issue in RPMT on the same day of the review.

*Note: Please use safe interviewing practices to reduce the probability of an incident.*



# FILLING OUT THE SUMMARY REPORT

- Utilize observations from the entire review (Q&A from introductory meeting, financial review, beneficiary visits, facility tour) to complete the Summary Report.
- Make sure to record any discrepancy between the observations during the review and the current SSA-9584BK in the applicable section of the Summary Report.
- Note: There will be only ONE Summary Report prepared and uploaded into the RPMT even if there are two site visits required. Incorporate observations from both review locations into the one report.

# COMPLETING THE REVIEW

- Complete the Review Checklist in RPMT (in checklist tab) making sure to add and save any comments on the same page.
- Upload completed reconciliation worksheets. (If 2 worksheets were required, title them differently to ensure SSA knows which ones were from the state and which one for from the facility.)
- Upload list of State and/or institution/State agency staff who attended the introductory meeting, and the Findings Checklist into the "4. CAP, Evidence, Other" folder in the Case Documents tab.
- Upload completed Summary Report into the "7. Summary, Final Report" folder.

*Note: CAP is not applicable for this review type.*



# REVIEW CHECKLIST

## + Review Checklist

P&A Reviewer Submission	Subject
	Payee scheduling urgent issue and supporting materials
	Immediate health or safety threat issue and supporting materials
	Financial exploitation issue and supporting materials
	Payee not acting in the best interest for other reason and supporting materials
	Suspected misuse issue and supporting materials
	Beneficiary identified need and supporting documents
	Reconciliation sheet(s) complete
	Appointment letters
	State Onsite Institution/State agency Findings Checklist
	Summary Report of the State Onsite Institution/State agency Review
	SSA-9584(s)
	Reconciliation sheet(s) for each beneficiary in the sample
	List of State and/or institution/State agency staff who attended the introductory meeting
	List of current beneficiaries the payee service
	List of beneficiaries not in the custody of the institution/State agency
	P&A grantee discussed the representative payee reporting responsibilities with the payee
	Data discrepancy issue(s) documented properly
	All notifications reported
	Other supporting documents uploaded

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# ISSUES AND NOTIFICATIONS

- Before submitting the final report, make sure to add any additional issues and notifications into the system.
- Issues need to be completed for the following:
  - Health or safety issues;
  - Beneficiary Identified Needs;
  - Concern of possible financial exploitation; and/or
  - Any other issue negatively affecting a beneficiary's well-being.

*Note: These types of issues should be reported on the same day as the reviewer discovered the concern. The report must include the name of each beneficiary affected and details of the issue.*



# ANY QUESTIONS?

