



The Office of Homeless Services SAVINGS PROGRAM POLICY AND PROCEDURES

Although not mandatory, all OHS clients are strongly encouraged to save a portion of their income to be used to secure transitional and/or permanent housing. Therefore, the Office of Homeless Services requires all Emergency Housing Providers ("Providers") to establish internal mechanisms necessary to collect and maintain savings from any client (with income from any source) currently staying in their emergency housing facility who chooses to participate in the OHS Savings Program. This includes, but is not limited to, hiring and training of additional staff as needed; acquiring and installing computers and software; setting up bank accounts; establishing secure filing systems; setting up staff email accounts for reporting, and developing appropriate administrative internal controls to insure procedural efficiency and integrity.

Savings Program Policy Requirements

A. Client Savings Policy

Because the intent of the OHS Savings Program is to support the housing goals of the client, staff should recommend and encourage clients to participate in the Savings Program and to only make withdrawals from their savings account for permanent/transitional housing expenses, or upon discharge from Emergency Housing.

However, clients do not need staff approval to make partial or full withdrawals of their savings. Clients may also end their participation in the Savings Program at any time while still residing in Emergency Housing.

B. Master Savings Account

Providers shall establish and maintain a master savings account at a local banking institution with sub-accounts setup for each client who chooses to save. These sub-accounts should be available for use within 30 days of a client's placement at a Provider's facility.

In the event that accrued interest exceeds any fees applied to the master account during any given period, such interest should be allocated to client accounts.

Providers shall establish a system to effect deposits and withdrawals to client accounts in a timely manner. Additionally, providers must hear and resolve all grievances resulting from challenges to balances or specific areas of the process. **(See Grievance Procedures).**

Providers shall remove any employee from the savings process that violates the client trust by misrepresenting facts, falsifying records, extorting funds, stealing or knowingly not adhering to the established process.

Providers shall establish a system of regular correspondence with the client's assigned case managers for savings balances, changes in income, and withdrawals.

C. Client Savings and Discharges or Transfers

Upon discharge from your emergency housing program, the client's savings balances should be reconciled and presented to the client on the day of discharge. If for some reason you cannot make the check available on the day of discharge, the client must be presented a written statement with an authorized signature containing the date and time the check will be available for pick up. In no circumstances must a client be made to wait more than 72 hours post-discharge to receive their savings balance. In the event that the client files a grievance challenging the savings balance, the resolution must occur within 72 hours of the client's discharge.

In the event that a client is moving to another emergency housing, transitional, or other subsidized housing program that requires a transfer of a specified amount of the client's savings, you must obtain a Request for Payment from the new housing provider or the client's case manager. This documentation must include the actual amounts to be transferred to the housing provider along with the legal name of the organization and an identified contact person. The client and the client's case manager must authorize the savings transfer request.

D. Unclaimed Savings

If a client is discharged from your facility for any reason and does not return to claim their savings balance, you must hold their account open for one year post the day of discharge. After one year, you must turn such balances over to: **The Bureau of Unclaimed Property, Pennsylvania Treasury, North Building, 2nd Floor, Harrisburg, PA 17120**. It is recommended that you report such accounts to OHS at least 90 days before the account is transferred to the State so that we may search for the individual in our system.

E. Deceased Clients

In the event of a client's death, funds can be released only if the person claiming the funds has a Letter of Administration from the City of Philadelphia Wills. **This must be done in the absence of a Will.** 12 months after date of death, or discharge from emergency housing (whichever occurs first), funds remaining unclaimed in such accounts will be turned over to: The Bureau of Unclaimed Property, Pennsylvania Treasury, North Building, 2nd Floor, Harrisburg, PA 17120.

Roles and Responsibilities

A. The Provider

1. Orientation

The Provider is expected to conduct an orientation which clarifies for staff and clients the requirements of the Savings Program process, and promotes uniform understanding of all issues of compliance. Within two weeks of admission to an OHS emergency housing facility, clients must receive an orientation from the Savings Program Representative about their option to participate in the Savings Program. The orientation should be scheduled during the first week of client's arrival at the facility, and must provide clearly defined procedures that clients and staff are to follow - through the collection, deposit, disbursement, reconciliation, and grievance processes.

Within two weeks of admission to the facility, the client's case manager must have an initial meeting with each client, whether they choose to participate in the Savings Program or not, to verify income and review any SSI, SSA, Unemployment, and/or Public Assistance award or verification letters. (Although participation in the Savings Program is not mandatory, this initial meeting is an ideal opportunity to recommend and encourage the client to participate in the Savings Program).

Once the client has received this orientation and had the initial meeting with their case manager, the client can start participating in the Savings Program at any point during their stay in Emergency Housing.

All clients who decide to participate in the Savings Program must sign a Savings Program Agreement form (created by the Provider) that indicates the client understands what is required and is willing to comply with the terms of the agreement based on the OHS Savings Program Policy. All clients participating in the Savings Program must also be provided instructions for completing a money order, and informed of the collection and disbursements schedules. Both the client and the Savings Program Representative providing the orientation must sign the Savings Program Agreement form; a copy of this signed form must be kept in the client's official record.

For staff, the employee manual should be updated to include Savings Program policy and procedures, and specific consequences for any violation of client trust. Providers must notify OHS in writing of staff changes within five (5) business days.

2. Collections

The Provider should designate specific dates and times savings will be collected.

Payments from clients into savings accounts must be done by money order. Upon receipt of client monies, the Savings Program Representative must issue a date stamped Receipt Form to the client (generally a cash or money order receipt form) that must be signed by both parties. The client should receive the original receipt and the provider must keep a copy for their records and reporting purposes. All monies are to be held in a safe in a locked office until deposited into a financial institution within three (3) business days.

Clients are required to keep all personal transaction documents in a secure location.

3. Deposits

Providers must deposit client money orders into savings accounts within 72 hours of collection. The Provider must maintain hard copies of each monthly **Statement of Deposits** from the financial institution, and make them available to OHS for scheduled audits.

All clients must be provided an individual **Monthly Client Account Statement** that contains year-to-date balances of all savings collected, a copy of which must be kept in the client's official file.

4. Disbursements/Withdrawals

Each emergency housing program must establish a set schedule of days and times when client savings checks or withdrawals will be disbursed. It is required that there be a minimum of two days per week that disbursements are made.

The Provider must utilize the Request for Payment Form (RFP) (client's withdrawal), which identifies the reason for the withdrawal; indicates the amount of the requested withdrawal; and provides signature spaces for the client, the case manager, and the Savings Program Representative.

For internal control purposes, there must be at least two signatures on the RFP. Any employee who signs the RFP cannot be a signatory on the provider checks.

If a client decides to withdraw their savings and leave Emergency Housing to make their own housing arrangements, any decision on re-eligibility for OHS services must be made by an OHS supervisor or administrator. A Withdrawal of Savings/Self-Discharge form must be completed, and a copy of it kept in the client's official record.

5. Unclaimed Savings

In circumstances where a client has left emergency housing without withdrawing their savings, the Provider is required to hold the savings in the custodial account

for one year. The Provider must make a good faith effort to contact the client using OHS data systems or other mechanisms to determine if the client is in another shelter, or has some known address in the community. If the emergency housing provider is still unable to contact the client after one year, all unclaimed savings belonging to the client must be sent **to The Bureau of Unclaimed Property: Pennsylvania Treasury; the North Building, 2nd Floor; Harrisburg, PA 17120**. Savings are held by the PA Treasury Department for seven years. To obtain unclaimed savings submitted to the Treasury, a client must contact the Pennsylvania Treasury Department.

6. Reconciliation

The Provider must reconcile all deposits of savings and withdrawals on a monthly basis. Using the Savings Spreadsheet Log (created by the Provider), client receipts and other forms associated with this process should be tested for accuracy during this time. Should a discrepancy arise regarding the year-to-date balances, the Savings Program Representative must report all findings to the client and the client's case manager, as well as take the necessary steps to resolve the discrepancy, or report them to an authority within the organization that can make the appropriate corrections.

Additionally, the Savings Program Representative must meet with each client at least monthly to discuss the status of the client's year-to-date savings balance. At this time the client will be given a Monthly Client Account Statement, which should also be forwarded to the client's assigned Case Manager for the case record.

7. Grievance

The Provider must establish a Client Grievance Procedure that will assist the emergency housing program and client to effectively identify and resolve issues involving any step in the savings process. Providers must hear and resolve all grievances resulting from challenges to balances or specific areas of the process. A Grievance Form should be created and made available that lists the methods for filing a complaint, and captures the relevant issues and potential resolutions on each step of the grievance process. The Grievance Procedure/Policy should be included in the orientation process, and signed off on by the client in the Savings Program Agreement.

Grievances must be heard within 48 hrs (2 business days) of filing. Clients discharged from emergency housing must have their grievance reviewed by an Office of Homeless Services representative within 72 hours (3 business days). **OHS retains the right to investigate with the intent to resolve all disputes unsettled by provider after five (5) business days.**

8. Client Appeals

OHS serves as arbitrator in all unresolved grievances between the Provider and the client on amounts applied to and reimbursed from savings. OHS shall review all pertinent documentation submitted by the Provider including client receipts, savings logs and monthly savings statements. OHS assumes honesty on behalf of the client until credible evidence is presented by the Provider to disprove this claim.

9. Transferred Savings Balances

When a client transfers from one emergency housing facility to another, the Provider holding the client's savings must arrange for transfer of the client's savings balance to the new emergency housing provider. The process can occur in one of three ways:

- The client can make a request for payment to be made to the new emergency housing facility. The current Provider must contact the new Provider to acquire the appropriate information to complete the transfer.
- The new Provider can make the request for the client, but must submit a request for payment signed by the client.
- In instances where the client or the new Provider fail to make the request, the Provider holding the savings must make a good faith effort to locate the client and collaborate with the new emergency housing provider to transfer the savings balance.

B. Client

1. Income Reporting/Verification

Although participation in the Savings Program is not mandatory, each emergency housing client is responsible for reporting and verifying all earnings/entitlements received to their case manager. The client is responsible for reporting and verifying all changes in income/entitlements to their case manager within five (5) days of the change in income.

2. Orientation

The Savings Program orientation is to clarify for staff and clients the requirements of the Savings Program process, and promote uniform understanding of all issues of compliance. Within two weeks of admission to an OHS emergency housing facility, all clients must receive and attend an orientation from the Savings Program Representative about their option to participate in the Savings Program.

All clients who decide to participate in the Savings Program must review and sign the Savings Program Agreement form with the Savings Program Representative;

participate in a training on how to complete a money order; informed of the collection and disbursements schedules; and have the formal procedures for savings-related grievances explained to them. Both the client and the Savings Program Representative providing the orientation must sign the Savings Program Agreement form; a copy of this signed form must be kept in the client's official record.

Clients are required to keep all personal transaction documents in a secure location.

3. Grievances

Clients who wish to make a complaint regarding their savings shall initiate formal grievance procedures consistent with emergency housing grievance policy.

Office of Homeless Services Oversight

A. Audits

OHS will audit each savings program at least once per year, or as needed, to ensure there are no violations of client trust, and that all corrective measures are implemented as suggested. After completion of the audit, the audited Provider will receive a detailed Audit Report of all findings and recommendations for corrective action within a reasonable timeframe. The OHS Budget Officer will provide technical assistance to the emergency housing provider to help address the issues that require immediate attention. The Provider must keep documents available on file for five (5) years, even if an audit has been conducted by OHS. Each provider will be notified in writing of the audit date and must make available all pertinent records, including:

- Signed Client Savings Program Agreements
- Bank statements for savings accounts
- Completed and signed income disclosure agreements
- Savings Spreadsheet Logs
- Money Order receipts
- Compliance with OHS Savings Program Policy and Procedures
- Evidence of correspondence and collaboration with Case Management

B. Compliance & Performance Reviews

OHS staff will conduct provider orientation and training, as well as on-going technical assistance, as required. OHS representatives will conduct periodic reviews of the Internal Controls established by the Provider to ensure sufficient checks and balances; detect, minimize, and prevent errors in process; as well as prevent unauthorized account activity. Quarterly analysis of performance trends in collections, transactions and client participation will be provided to each Provider. These quarterly reports are to assist the Provider in:

- Monitoring Savings Program participation;
- Assessing activities that cause these trends;
- Correcting procedures to maximize participation

C. Corrective Action Plan (CAP) Review

A corrective action plan addressing all audit findings is due fourteen (14) days after receipt by Provider of the audit review from OHS. OHS will review each CAP and respond to it within fourteen (14) days. If additional corrections are required, your agency will be notified and expected to respond within 7- 14 days. Complete implementation of all corrective actions is expected to occur within 30 days.

D. Standardized Procedures

OHS has established minimum standardized procedures each savings program must incorporate. Questions regarding savings programs policies and procedures can be addressed by your assigned OHS analyst.

Definitions

1. Savings Program Provider /Client Agreement: Individual agreement tailored according to a client's or family's savings goals.
2. Collection schedules: Denotes the times that savings deposits/disbursements will be accepted from or given to clients (listed on the Provider/Client Agreement and also posted on Client Information Bulletin Board.)
3. Money Orders and Money Order receipts: Copies of MO's with corresponding receipts in chronological order.
4. Monthly Reconciliation: Signed by client - a statement of the client's monthly Savings Program transactions, with a copy to the case manager for compliance verification.
5. Request for Payments: Withdrawal request from savings initiated by the client and signed as approved by the case manager and Savings Program Representative.
6. Grievance Policy: Included in the Savings Program Policy or presented in a separate document. It details the specific grievance process from initial complaint to final resolution.
7. Grievance form: Used to guide the client in submitting a written complaint.
8. Transferred Savings: Whenever a client transfers to another emergency housing or transitional housing facility, their savings must also be transferred within five (5) business days. Savings are transferred to transitional housing programs in accordance with each programs established standards. Clients must sign a statement acknowledging full receipt of their funds. A copy of the check and the signed receipt must be maintained in the client's financial file.

9. Unclaimed savings: Savings contributed by the client which were not claimed by the client when s/he left emergency housing.
10. Provider Bank Deposits: Client monies must be maintained in a locked safe or other secure location at the shelter no more than three (3) days.
11. Reporting: Failure to adhere to reporting requirements may result in a hold being placed on Provider contract payments.