



City of
Belfast

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Joseph Slocum <citymanager@cityofbelfast.org>

Joe's Follow up Review
AND PLAN

Send data from MFP11293479 08/23/2016 10:37

3 messages

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Tue, Aug 23, 2016 at 1:37 PM

To: City Manager <citymanager@cityofbelfast.org>

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Date:08/23/2016 10:37

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Joseph Slocum <citymanager@cityofbelfast.org>

Tue, Aug 23, 2016 at 11:45 AM

To: Ian.Miller@maine.gov, Ellen.Moore@maine.gov

Ian and Ellen,

Here is my review of the Audit you performed. Please let me know if I am on the right track or if I have misunderstood anything. Sorry it took this long but I needed to set aside a couple of days to review and think about all of this.

Thank you,

Joe

[Quoted text hidden]

Joseph J. Slocum
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Miller, Ian <Ian.Miller@maine.gov>

Wed, Aug 24, 2016 at 8:34 AM

To: Joseph Slocum <citymanager@cityofbelfast.org>, "Moore, Ellen" <Ellen.Moore@maine.gov>

Thank you very much Joe,

We will go over your review and the corrective action plan and provide a response as soon as possible.

Ian Miller | General Assistance Program Manager | Office for Family Independence | Maine Department of Health and Human Services | p 207.624.4138 | f 207.287.3455

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From: Joseph Slocum [mailto:citymanager@cityofbelfast.org]
Sent: Tuesday, August 23, 2016 11:45 AM
To: Miller, Ian; Moore, Ellen
Subject: Fwd: Send data from MFP11293479 08/23/2016 10:37

[Quoted text hidden]

To Ellen Moore and Ian ^{Killer} Mactean:

From: Joe Slocum, City Manager

Date August 22, 2016

Re: Review of June 30, 2016 DHS Audit

Ellen and Ian,

This is my independent review and conclusions from the Audit you conducted on June 30th. I understand that 57 files were provided to you and you had comments on 13 of them. Here is what I saw in these 13 files. I have identified them sequentially according to Ellen's list and noted them by the first letter of their last name. Where there were two applicants whose last name started with the same letter I used a "2" to note the later listed applicant.

I am also attaching my conclusions and my plan to improve our management of GA. I would appreciate any thoughts you have on anything I am providing to you in these documents. If I am misunderstanding you or incorrectly stating something please correct me. I am available any time to talk or meet so that we can manage GA as we are supposed to do.

Thank you for your assistance. I look forward to hearing from you.

Joe

Part #1 City Manager's review of Audited files

P-1

We agree application should have been signed and that the lack of narrative detail left confusion in the file. Even DHS was confused in thinking we paid \$75 for electricity against a disconnection notice of \$913.19 which was reduced by applicant payments to \$681.92. Our eligibility decision did say applicant was entitled to \$75 for electrical assistance but the file also showed that we paid no vouchers on this applicant's behalf because it would not get her electricity back on. We referred her to WCAP- amp program, GBAM and the Salvation Army. The last we heard was that a relative helped her out but this was also not recorded in our narrative as it should have been.

B-1

DHS does not want the City to note in the file that the applicant received some non-GA financial help from the City. We respectfully disagree and believe that we are supposed to document all resources available to an applicant. What we likely should do is make very clear in the narrative what is GA reimbursable and what is not.

We did not keep copies of the receipts the applicant showed us and you want us to so we will.

It is inconsistent and odd- but apparently nevertheless the rule-- that an Applicant is entitled to reduce their income by the cost of transporting themselves to work. This increases financial eligibility. However, that same applicant is not entitled to claim payments for car insurance that is needed to drive to work as an eligible expense. In this case and henceforth the applicants GA eligibility should have been reduced by the \$80 the applicant paid for car insurance. We will follow the state's rule that car insurance is not an eligible expense. The City recognized \$340 in income and eligibility at \$309. The State says we should have added the \$80 car insurance payment as available cash for eligible expenses and would have hence recognized \$420 in income and then eligibility at \$229

Our documentation on the eligibility form was not good. We had mathematical errors by indication \$325 for partial rent when it was really \$225. We gave total assistance of \$300. If we follow the States rule about treating her \$80 insurance payment as available cash which left the applicant at \$229 then we overpaid by \$71 as there is no documentation that there was an emergency.

H-1

Application is dated 5/11. We put no narrative in file making it difficult to see what we actually did. Eligibility form says applicant eligible for 324.50 but housing voucher is for \$258.

DHS said we allowed one bed for a single person. Do not know what this means. ??? GA application itself says that no one lives with him.

Applicant was previously provided GA Assistance in April and as part of his requirement at that time he was to look for work 5 times a week. 40 days later he could only document that he look for work at 10 places over a eleven day period.

Because applicant partially complied with work requirement we recorded eligibility at \$324.50 but only provided partial assistance of \$258 . Had he completely complied with the work search requirements of 5 places every week then he would have been eligible for \$649 in GA assistance. DHS appears to be saying that if the applicant fails to comply with any requirement from a previous months grant of GA assistance that we give \$0 GA Assistance. Please confirm this requirement.

D-1

Continued file review problem where the Statement of eligibility does not match actual GA expense and this is not cleared up in a narrative. DHS reads Eligibility form as what we spent. Belfast GA Administrator does not. This will be cleared up. If there is any discrepancy between what eligibility form indicates and what is actually spent then Belfast GA person will have that explained in the narrative.

So the review of this file by DHS was made more difficult because eligibility did not mean expenditure. Hence DHS concern that we paid \$49 for personal and health supplies is incorrect as we paid \$0

DHS concern that we spent \$150 on food that could not keep at a hotel was incorrect as we only paid \$50. Note there is no voucher in file to document the expenditure of this \$50.

M-1

Application 4/28 DHS says applicant needed to do a job search. However our file disagrees. Our narrative says 3/30 that applicant is applying for SSDI. Are people applying for SSD or appealing a determination against disability required to look for work? Please clear this up for me.

DHS Says Invoice is for \$1,198 and Decision written for \$523- I CAN NOT FIND ANYTHING IN THIS FILE THAT SAYS THIS

DHS suggestion to putting voucher numbers on eligibility decision is a good one. I think we should consider a separate sheet or our new software system which tracks vouchers directly to specific applications.

B-1

Conditions of eligibility placed by GA Administrator were not followed which should lead to a complete denial of assistance. See (H-1) above.

Again we have misunderstanding between what DHS sees in file and what actually happened. This is due to poor narration.

DHS sees prospective income ignored when narration failed to say that he was no longer employed.

DHS sees job search eligibility not performed when narration failed to note that he was temporarily employed.

S- 1

Job searches should be required unless medical reasons for not doing so.

Again there is file confusion created by the lack of a narrative as to what drove the City's decision and what that decision actually was.

The applicant said they needed rent, food and household supply help. City GA eligibility decision said eligible for \$127 food and 45 personal and household. The City's file shows no record any money actually spent- no vouchers for this eligibility. Did she get any assistance from this application?

B-2

The City failed to have an applicant who was applying for Social Security Disability sign a (IAR FORM) form that says that if they actually get their disability and it is retroactive to the period when we gave GA assistance to then both the City and the State are to get reimbursed

People who are not asked to look for work as part of their ongoing assistance must have a Doctors statement in the file that they are not capable of working

V-1

IAR form not signed. THIS WAS CORRECTED 7/7/16

No Dr. Note saying wife unable to work

Application 6/7 makes no provision for Wife's potential monthly income when she goes back to work on 6/13. We need to consider all assets available during the period of eligibility.

Deficit calculated at \$640 and unmet need calculated at \$1,332. Decision is supposed to offer the lower number in assistance and Belfast GA authorized \$1,070 in eligibility decision.

NOTE: Manager also reviewed application of 7/7/16. Belfast GA noted \$0 deficit and \$518 in Unmet need. Appears that Belfast GA should have denied assistance as lower number is \$0. Eligibility decision mistakenly says entitled to \$578 which makes no sense.

D-2

Returning applicant did not complete conditions of eligibility from prior visits and hence is ineligible for general assistance. He was given Job forms and he failed to look for work at 5 places a week on applications dated 3/29/16 and 4/28/16 and he was not disabled.

On 5/31 visit he indicates he is disabled. Problem there must be a Dr. Note and there must be an IAR signed if he is applying for SSD.

There was also no budget done and no documentation of either deficit or unmet need. Application is incomplete. You can't rely on last application. Each application is fresh and must have all the required detail in it.

C-1

Application fails to document all who live in household and their resources. Apparently mother is also part of household and has income.

Application says that income for prior 30 days was \$77.27 but then reflects unexplained income of \$640.

The deficit was \$834.11 but the eligibility form says eligible for \$873.

Confusion on landlord verification due to lack of narrative.

There is no explanation of any of this in the Narrative making it impossible to understand the decision.

N-1

Former eligibility requirement was to keep receipts. No record this was done.

No request to account for prior 30 day expenditures as required.

No narrative explaining \$0 income as child support from Caseworker which led to DHS misunderstanding that we ignored the requirement for reviewing prior 30 day expenditures.

We paid an electric bill without seeing a copy of the bill. We only pay verifiable amounts.

M-2

12/15/15 Required to look for work 3 places a week- no documentation he did so and yet we provide assistance the next month on 1/15/16 but now we do not require him to look for work even though no indication of disability.

2/18/16 application – no require him to look for work even though no hint of disability.

2/18/16 application -GA Amount is \$1,189 and yet eligibility is \$1,603

3/17/16 application we paid an electric bill not in applicants name. This is impermissible. CITY notes that the name was his ex-wife.

Appears to be a debate about requiring applicant to apply for Food Supplement but not holding him to that requirement. He was required to apply on 12/15/15 and 5/18/16. Narrative says he got food stamps 3/18/16

He was required to apply for fuel assistance on 3/17/16 with no verification when we provided further assistance on 4/19/16 and 5/18/16.

Part #2 City Manager's conclusions from DHS case reviews dated June 30, 2016

1. Belfast needs to have its files tell the complete story from the application to the decision to the actual payment of assistance. City and the State want to be able to open up a file and understand what was presented, what was the decision and what was its justification without additional communication from the GA Administrator.
 - A) There should be a short narrative on every application that identifies any deviation of the required application form and process. If the application and the eligibility determination are not self-explanatory on the face then they should be explained in the narrative. Every time every application.
 - B) We see a number of applicants who repeat month after month. Every application and all supporting material including the narrative should be stapled by month so that we do not confuse supporting documentation from one application into another.
 - C) Compliance with eligibility requirements from the last visit need to be mandated every time every application. If someone has not look for work as required nor applied for other forms of assistance as required then they are not eligible under the present application. Eligibility requirements are mandatory.
 - D) File documentation needs to improve.
 - We need to keep records of receipts that are presented to us.
 - Eligibility determinations need to be matched up to actual payments. DHS reads the eligibility determination as what we are paying but that is not always the case. We need to document both what applicant is eligible for and what we actually paid.
 - File H1 showed applicant eligible for three \$245 for housing voucher but we paid \$258.
 - File S-1 determined financial eligibility but there is no record that anything was paid.
 - A household member who is returning to work in the 30 day period must have that prospective income taken into account as an available resource for that period. -
 - Applications need to be signed budgets need to be done and deficits or unmet needs need to be calculated in every file.
 - In file C-1 the deficit was \$834.11 but the eligibility form said \$873.
 - File M-1 the GA amount is \$1189 yet eligibility was moved to \$1603.
 - People who are required to look for work must have that noted on their eligibility form.
 - Car insurance is not an eligible expense so must be calculated as cash that's available to pay for eligible expenses.
 - E) Eligibility rests on the lower number of either deficit or unmet need. When one of those numbers is a zero then there is no general assistance. See file V – 1
 - F) There should be only one color of pen used. Eligibility forms in the file should look the same as the one sent to the claimant. If there is additional detail it should noted elsewhere to avoid confusion between what is authorized (eligible) and what is actually paid.

Part #3 City Manager's Recommendations for improvement:

1. We need to save time in this process so that we have enough time to make sure documentation is complete in our narratives explain anything that is not clear from the documentation. This is a time efficiency and management issue.
 - A. Every applicant who can fill out an application should do so to the best of their ability before they walk in in greet the General Assistance Administrator.
 - B. The GA administrator should immediately check to see if prior conditions of eligibility have been complied with. If not we should be prepared to do deny or explain why we are not denying in the narrative. We need to highlight this consequence when they came in the last time so that when they come in this time there is no confusion that they are not eligible because they did not comply with our request.
 - C. We should use our new software system every time in the presence with every applicant to make sure we are recording accurately. Repeat applicants should still fill out applications and sign them to attest to whatever their circumstances are at that time.
 - D. Every file must contain a review of last month's expenditures which includes receipts. This is part of the new software system and a hard copy of the complete application as inputted into the new software system should be kept in the file for every application.
 - E. GA appointment should not be closer than 90 minutes from one until the next. We should endeavor to get the appointment down to an hour so that we are left with a half an hour to secure our documents, note our narratives and authorize our vouchers. Each application is a separate file within each file folder and as such we should identify the actual vouchers issued that relate to that particular application.
 - F. We should consider the installation of the Dragon NaturallySpeaking program so that the GA administrator can easily dictate a few sentences of narrative on each application. The narrative can be a running narrative which should be located in the front of the file as a very brief running summary of applications and decisions over time for that applicant.
 - G. It seems that we are handwriting on almost every application the need to bring in receipts. We should look for a better clearer way to communicate what we are trying to communicate. If I were to use a different color pen it would be a red one to highlight what they must do to be eligible again.
 - H. If we are seeing any applicant more than once a month for any reason then we should decide how to do that efficiently. If they come back for another food voucher we may be busy with a different applicant. Should we consider schedule one hour every day for these return visits that are not made by appointment? Is there a more efficient way?
 - I. Scheduled time for paperwork should be just that. Drop in's must schedule appointments and should not interfere with dedicated paperwork time. If we use our new software system there will be less paperwork to catch up on.

J. Verification process needs to be efficient

K. We need an efficient way to match vouchers to invoices. Review Hannaford challenge with monthly sheets

2. We have to be sound on our process. The use of the new software program should address at least 75% of the items turned up in the Audit.