

New Hampshire Division for Children, Youth, and Families

Child-Centered Benefits Management Assessment Final Report

Prepared by Public Consulting Group

December 20, 2024

TABLE OF CONTENTS

EXECUTIVE SUMMARY	2
INTRODUCTION AND BACKGROUND.....	7
METHODOLOGY	9
Literature Review	9
NH DCYF Data & Information Review	9
Cost Analysis	9
Recommendations and Implementation Plan	10
FINDINGS	10
Overview of a Holistic Child-Centered Benefits Management Program	10
Review of Account Options	12
Peer State Review	14
Ascensus ABLE Guidelines and Requirements.....	17
Business Process Review of DCYF’s Existing Benefits Management Program	18
Impacts of Developing a Child-Centered Benefits Management Program	22
RECOMMENDATIONS.....	25
Screening and Applications	25
Benefits Management	27
Communication, Collaboration, and Internal Training	28
Financial Literacy	29
IMPLEMENTATION ROADMAP	30
Phases of Developing the Program:	30
APPENDIX A. ASCENSUS ABLE PLATFORM IMAGES.....	35
APPENDIX B. COST ANALYSIS CALCULATIONS.....	41

EXECUTIVE SUMMARY

To continue the work toward establishing a child-centered benefits management program, the New Hampshire Legislature provided funds to the New Hampshire Department of Health and Human Services Division for Children, Youth, and Families (NH DCYF) to hire a consultant to explore the potential for implementing a child-centered benefits management program through House Bill 1598. Through this funding, NH DCYF contracted with Public Consulting Group (PCG) to conduct an assessment of the state's existing program, research and document the principles and practices that are central to a child-centered benefits management program, assess the fiscal implications of adapting NH's existing program, and lay out recommendations and a possible implementation plan for NH DCYF's consideration. There are a number of possible fiscal models and recommendations that PCG outlines throughout this report for NH policymakers to consider. These potential fiscal models have varying resource and budget implications, as well as outcome implications for children and youth in the custody of the state, that policymakers should carefully consider.

Social Security and other benefits are provided to eligible children to support their caretakers in meeting the child's needs. When a child is placed in the legal custody of a state's child welfare agency, the agency becomes responsible for the child's care and must decide how to utilize these benefits. Typically, when the child welfare agency assumes custody, it is also designated as the representative payee for Social Security benefits, which can include Supplemental Security Income (SSI) and Retirement, Survivors, and Disability Insurance (RSDI). These funds are generally used to cover the costs associated with the child's care.

The Social Security Administration (SSA) requires that children under the age of 18, as well as adults who are unable to manage their own funds due to a disability, and who are recipients of SSA benefits, have a representative payee that manages the receipt and use of related funds. When a state agency becomes the representative payee for children in the legal custody of the agency, the state typically applies Social Security Income (SSI) and Retirement, Survivors, and Disability Insurance (RSDI) benefits toward the cost of caring for those children, as this is the intended use of the funds.

SSA does not permit recipients of SSI to have income and resources that exceed \$2,000. For children in out-of-home settings, resources typically consist of a savings account. Once resources are above the \$2,000 threshold SSI benefits will be suspended and eligibility will eventually terminate if SSI benefits remain suspended for 12 months. This has previously limited state agencies' ability to conserve benefits on behalf of children to support permanency plans and/or to support older youth aging out of foster care. Although states are legally permitted to utilize benefits to pay for the cost of care, it is in the child's best interest for states to conserve as much of these funds as possible for the child's future use to cover living expenses and necessities.

In 2014, the Achieving a Better Life Experience (ABLE) program was signed into law at the federal level. This program allows individuals with disabilities that began before the age of 26 to save and invest in a tax-advantage savings account where the balance of the account does not impact eligibility for SSI and Medicaid. ABLE is a federal program administered at the state level. Since 2015, 46 states have implemented ABLE programs. The ABLE program has had a significant impact on SSI recipients and payees who have struggled with the \$2,000 limited resource rule, particularly as the cost of living continues to increase. In the past few years, while state agencies have begun to explore ways to expand their Social Security benefits program for youth in foster care, learning about ABLE programs has escalated the conversation because ABLE accounts have expanded options that have not been available to SSI recipients and their payees.

The topic of expanding Social Security benefits management programs for youth in foster care to create a child-centered program model has gained a lot of attention and interest from child welfare senior leadership and state legislators across the nation. Many states have begun to adapt or are strongly considering adaptations to their existing benefits management models toward a child-centered approach. This approach

includes conserving funds, allowing children access to funds for their current needs, having robust screening and application processes and increased transparency and education for all partners. New Hampshire is among those states that have begun to take action toward adapting their program toward a more child-centered approach. New Hampshire's existing benefits management program already incorporates several practices and principles that are central to a child-centered benefits management model.

To complete this assessment, PCG conducted a literature review of benefits management programs across the country to identify key concepts and approaches that are central to effective benefits management programs, and to critically analyze programs across the United States. This literature review also incorporated an assessment of the different trust account options available to NH DCYF. A mix of quantitative and qualitative data collected via data requests to DCYF, document reviews, and an interview with DCYF staff were used to establish a detailed understanding of NH's existing benefits management system. The information and data provided were reviewed to establish the current business processes that DCYF practices and identify opportunities to develop a more comprehensive child-centered benefits management program. Ascensus guidelines and requirements for the ABLE program in NH were also reviewed to provide a clear understanding of the necessary action steps to begin utilizing the program. PCG identified the following program strengths and gaps.

Program Strengths

There are a number of notable strengths in NH DCYF's existing benefits management program as a result of the agency's preexisting commitment to centering the best interest of the child in its benefits management model. These strengths will be foundational to expanding and adapting toward a child-centered program. There will be an additional level of effort required in order to enhance these strengths and existing practices to align with best-practice for a child-centered benefits management program. Existing program strengths include:

- ✓ ***A process for identifying the most appropriate representative payee.*** The existing program carefully considers, on a case-by-case basis, the most appropriate representative payee for a child receiving benefits. For children being placed in kinship settings, the department does not seek to become the payee, and instead works with the appropriate caseworker to provide the kinship caregiver with information about how to apply to become the representative payee. The department also supports older youth with the process of becoming their own representative payee, when appropriate, as they approach 18.
 1. ***Efforts to maximize the funds available to a child.*** NH DCYF has a disbursement process in place that allows caseworkers to access funds for a child's needs that may not be considered a typical cost of care. Additionally, when a child is dually eligible, DCYF carefully considers whether the child would benefit more from SSI or Title IV-E funding. When SSI provides more direct benefit to the child, the department foregoes Title IV-E funding. However, the department does still use SSI funds to offset the cost of care for the child.
- ✓ ***Preservation of funds for older children.*** The existing program protocol places a hold on accounts up to six months prior to a child turning 18 in order to conserve as many funds as possible for the child upon exit from care. The Accounts Receivable unit and the DCYF Administrator monitor these accounts to ensure that the \$2,000 maximum threshold is not exceeded during this time.
- ✓ ***An existing financial management tool.*** NH DCYF currently uses the Bridges software to manage child benefit accounts. This software is also used for accounting purposes. While this software was described as not being user friendly, the existence of this tool and staff familiarity with using and navigating the software is a benefit to the direction of the program.
- ✓ ***Financial Literacy access.*** Older children have access to some financial education and other life skills education through the Life Skills training program by Youth Villages.
- ✓ ***Comprehensive staff training.*** Case workers and other relevant staff receive training on available benefits and the process for accessing those benefits. The fiscal unit has an internal trainer, and the accounts receivable unit also conducts internal training on the benefits management program.

- ✓ **Supportive State Legislation.** In July 2024, NH state legislation was passed allowing DCYF to hire a consultant to complete this assessment. Further demonstrating support for adapting financial and benefits policies that are child-centered, in January 2024, state legislation was passed that allows children in foster care who are at least 16 years of age to open their own bank account. The goal of this legislation is to increase access to resources and support youth in developing financial literacy skills as early as possible. While additional research and planning are necessary to ensure that this policy does not hinder access to SSI benefits for eligible children, these efforts more generally demonstrate a commitment to child-centered practices.

Program Gaps and Opportunities

While there are several existing program strengths, there are necessary programmatic adaptations and/or enhancements that NH DCYF must consider in the pursuit of developing a comprehensive child-centered benefits program. These necessary changes will require a significant level of effort, leveraging existing resources and adding additional resources to carry out the implementation and ongoing operations of the child-centered benefits management program. These opportunities include:

- ✓ **Establish a comprehensive screening process** to connect children to benefits that they are entitled to. Currently, NH DCYF is only identifying 4 percent of their out-of-home care population as eligible for SSI. Nationally, states typically find that an average of 12 percent of children in out-of-home placements are eligible to SSI. According to Congressional Research Service report, researchers studying a nationally representative sample of children placed in out-of-home care following a child abuse or neglect investigation estimated that more than 20 percent had physical or mental health conditions that, due to their severity, duration, or risk of death, would likely qualify them for SSI.¹ This screening process must include a medical assessment as well as a technical financial eligibility review to identify children who may qualify for SSI or RSDI.
- ✓ **Collaborative training and information sharing.** Feedback collected from interviews with NH DCYF staff indicated that there are opportunities for strengthening collaboration between units both around training and information sharing.
- ✓ **Use of ABLÉ program accounts.** NH DCYF does not currently use ABLÉ program accounts for eligible youth, and this should be considered moving forward as a component of ensuring that as many funds as possible are available to and conserved for youth in the custody of the state.
- ✓ **Begin holding SSI and RSDI benefits in an interest-bearing account.** The SSA requires that any SSI and RSDI benefits held by the state in its capacity as representative payee must be kept in an interest-bearing account. Currently, these monies are held in revolving accounts that are not interest-bearing.
- ✓ **Expand financial literacy education.** Although youth in the custody of NH DCYF do have access to some financial literacy education, expanding on existing resources would be beneficial. More specifically, it is important to provide all eligible youth with detailed education and support related to SSA benefits and ABLÉ accounts. Additionally, materials should be established to support families in preparation for reunification. Preparing families for how to access and successfully manage benefits and other resources may reduce the risk of financial challenges impacting the stability and well-being of children and families.

When compared to a child-centered benefits management program, NH DCYF has several strengths that can be leveraged to expand the existing program. Appropriately managing Social Security benefits on behalf of children in the care of a state child welfare agency is complex. **To implement a child-centered benefits management program and conduct ongoing operations, PCG estimates that the state will**

¹ [Congressional Research Service. \(2021\). Children in Foster Care and Social Security Administration Benefits: Frequently Asked Questions.](#)

need to hire approximately eight new FTEs to support the existing resources. Alternatively, contracting with a vendor will cost the state approximately \$280,300 for implementation and \$461,300 annually for ongoing operations. A vendor will also be able to provide critical subject matter expertise and more flexible resources. It takes a significant level of effort to administer, especially when agencies adopt a child-centered approach. However, with good process in place, the programmatic benefits can better outcomes for New Hampshire children and families. This is particularly true over the long term, as children exiting care will be less likely to experience future challenges related to lack of available resources, such as persistent poverty and housing instability.

A child-centered benefits management program focuses on ensuring that decisions regarding a child's Social Security benefits are made with the child's best interests as the primary consideration. Here are the key principles of such a program:

1. **Pursue and Maintain Eligibility:** Maintaining SSI benefits can provide a sense of stability for children in foster care, especially as they transition out of the system. This continuity can help them better manage their health and financial needs as they move towards independence.
2. **Timely Benefits Management Practices:** The program ensures that the child's immediate and long-term needs are met. This includes using benefits to cover essential expenses in real time for things that DCYF or Medicaid would not otherwise pay for.
3. **Conserving Funds for Future Use and Permanency:** Setting aside of the benefits in a trust fund. Conserving the benefits through a financial tool that can be available for the child's future, that can support reunification plans or provide resources to youth who are aging out of foster care by providing them with resources they can use for things like housing, education, transportation or other significant expenses. The program adheres to federal regulations and guidelines to maintain the child's eligibility for benefits. This includes managing the child's funds utilizing tools like an ABLE account or saving allowable funds in a Personal Needs account.
4. **Fair Program Policies, Procedures, and Practices:** All children, regardless of their background or circumstances should have fair access to the benefits they need. This helps to address disparities and ensures that every child receives the support necessary for their well-being. Children in foster care often have diverse and complex needs, and an equitable approach ensures that resources are allocated in a way that best supports their individual situations.
5. **Holistic Support:** Beyond financial management, a child-centered approach includes providing additional support services, such as educational support and life skills training, to help the child manage their benefits successfully.
6. **Transparency and Accountability:** The program maintains transparency to all relevant parties regarding the child's benefit and in how funds are used and ensures accountability through regular communication, audits, and reporting. This helps build trust and ensures that funds are used appropriately.

By focusing on these principles, a child-centered benefits management program aims to provide comprehensive support to children in foster care, helping them achieve better outcomes and permanency both during and after their time in out of home care.

When considering the impact of developing a child-centered benefits management program, NH DCYF requested two cost analyses, listed below:

1. *To compare different approaches to conserving SSA funds for foster youth to review from a budget perspective the impact of conserving 100% of SSA benefits compared to other hybrid models.*
2. *To determine the potential reduction of Title IV-E dollars if NH DCYF were to apply for and collect SSI instead of claiming for Title IV-E maintenance.*

The current foster care population of NH DCYF is approximately 1,523 children and youth. For FY2024, DCYF serves as the representative payee for approximately 62 children who are eligible for SSI and 16 who are dually eligible for SSI and RSDI. Additionally, DCYF serves as the representative payee for approximately 212 children who are eligible for RSDI only. PCG compared the current amount of benefits that support paying for the cost of care and maintenance to four potential hybrid models. The table below provides an overview of the estimated budget impact for each of the four model approaches.

Table A-1. Projected Total Budget Impact by Model Approaches

Model Approach	Total Budget Impact
Model One: Conserve 100% of SSA Benefits	(\$2,177,112)
Model Two: Conserve 50% of SSA Benefits	(\$1,088,556)
Model Three: Conserve 100% of SSA Benefits for Youth Aged 14-21	(\$1,367,388)
Model Four: Conserve 100% of RSDI, 50% of SSI Benefits for Youth Aged 0-13, and 100% of SSI Benefits for Youth Aged 14-21	(\$1,950,834)

PCG recommends that DCYF follow the recommendations outlined in this report to expand its current benefits management program to a child-centered model.

Table A-2. Recommendations

Recommendations
<p>1. <i>Develop and Implement Child-Centered Benefits Management Policies and Procedures focused on Equity and Transparency in the following program areas:</i></p> <ul style="list-style-type: none"> ➤ Screening and Applications ➤ Benefits Management ➤ Communication and Internal Training ➤ Financial Literacy for Children and Families
<p>2. <i>Implement the New Child-Centered Benefits Management Program in Two Phases:</i></p> <ul style="list-style-type: none"> ➤ Phase 1 – Implementation. This phase focuses on communicating with internal and external community partners, developing and updating policies and procedures, and making key decisions for program structure. ➤ Phase 2 – Ongoing Program Operations. This phase focuses on operating from the new policies and procedures that were developed during phase one and monitoring program metrics for continuous quality improvement.

INTRODUCTION AND BACKGROUND

For many years, advocates, legislators, and child welfare leaders have considered how to best steward the benefits available to children who are eligible for and/or receive benefits such as Social Security and are in out-of-home placements. Social Security and other benefits are provided to eligible children to support their caretakers in meeting the child's needs. When a child is placed in the legal custody of a state's child welfare agency, the agency becomes responsible for the child's care and must decide how to utilize these benefits. The Social Security Administration (SSA) requires that children under the age of 18, as well as adults who are unable to manage their own funds due to a disability, and who are recipients of SSA benefits, have a representative payee that manages the receipt and use of related funds. Typically, when the child welfare agency assumes custody, it is also designated as the representative payee for Social Security benefits, which can include Supplemental Security Income (SSI) and Retirement, Survivors, and Disability Insurance (RSDI). These funds are generally used to cover the costs associated with the child's care. However, there is ongoing debate on whether these benefits should be used to cover placement expenses.

Many advocacy groups and other stakeholders argue that using benefits to cover placement expenses deprives children of benefits they are entitled to and forces children to supplement the cost of their own placements using personal funds. Those who argue for the continued use of these benefits to cover the placement expenses lean on precedent set by federal regulations and court decisions that back the use of these benefits to cover placement expenses under the agency's oversight. Those that believe benefits should be conserved also point to the long-term benefits of conserving these funds. Namely, conserving benefits allows children exiting care access to essential resources as they transition to independent living. This reduces the likelihood that they will face challenges such as food or housing insecurity, which often contribute to longer-term challenges that may require state-funded support or assistance down the road. Nationally, children and youth exiting care face high rates of homelessness and economic hardship that could be mitigated with financial resources.² Additionally, financial hardships on the part of a family often make it harder to reunite children with their families and to achieve and maintain permanency. This is especially true for families with a child(ren) with disabilities in which additional – and often costly – supports, services, and resources are needed to meet the needs of the child.

Even when benefits are conserved for children in the custody of the state, other long-standing financial restrictions limit the amount of benefits a child has access to at any given time. More specifically, SSA does not permit recipients of SSI to have income and resources that exceed \$2,000. For children in out-of-home placements, resources typically consist of a savings account. Once resources exceed the \$2,000 threshold SSI benefits will be suspended, and eligibility will eventually terminate once SSI benefits are suspended for 12 months. This has previously limited state agencies' ability to conserve benefits on behalf of children to support permanency plans and/or to support older youth aging out of foster care.

In 2014, the Achieving a Better Life Experience (ABLE) program was signed into law at the federal level. This program allows individuals with disabilities that began before the age of 26 to save and invest in a tax-advantage savings account where the balance of the account does not impact eligibility for SSI and Medicaid. ABLE is a federal program administered at the state level. Since 2015, 46 states have implemented ABLE programs. The ABLE program has had a significant impact on SSI recipients and payees who have struggled with the \$2,000 limited resource rule. In the past few years, while state agencies have begun to explore ways to expand their Social Security benefits program for youth in foster care, learning about ABLE programs has escalated the conversation because ABLE accounts have expanded options that have not been available to SSI recipients and their payees.

The topic of expanding Social Security benefits management programs for youth in foster care to create a child-centered program model has gained a lot of attention and interest from child welfare senior leadership

² [McDonald, S. \(2021\). National Alliance to End Homelessness. *Preventing homelessness for youth and young families in foster care: 2021 updates.*](#)

and state legislators across the nation. At the federal level, the SSA recently published a Request for Information (RFI) from child welfare and children's benefits stakeholders to inform the SSA on how to best support states in adapting to child-centered models of benefits management toward improving the outcomes of children in the child welfare system who are eligible for benefits. This was done in collaboration with the Children's Bureau.³

Many states have begun to adapt or are strongly considering adaptations to their existing benefits management models toward a child-centered approach. This approach includes conserving funds, allowing children access to funds for their current needs, having robust screening and application processes, and increased transparency and education for all partners. New Hampshire is among those states that have begun to take action toward adapting their program toward a more child-centered approach. New Hampshire's existing benefits management program already incorporates several practices and principles that are central to a child-centered benefits management model. For example, the program already consists of some practices to support children who are approaching 18, including:

- Supporting children in applying to become their own representative payee as they approach 18;
- Placing a hold on benefits accounts as early as six months prior to a child turning 18 to conserve as many funds as possible for the child's access and use upon leaving care (if exiting foster care);
- Pursuing and supporting the transition of payee to the child and/or eligible family member when appropriate;
- Providing life skills education to older children, including financial management information and skill building; and
- Passing state legislation in 2024 that allows children in state custody to open their own bank account at age 16 to allow older youth direct access to their own resources and to begin building financial literacy and skills prior to turning 18. It is important to note that the process for implementing this requirement will require careful consideration about how this could impact SSI benefits eligibility as a result of the \$2,000 limit.

In an effort to continue the work toward establishing a holistic child-centered benefits management program, the New Hampshire Legislature provided funds to the New Hampshire Department of Health and Human Services Division for Children, Youth, and Families (NH DCYF) to hire a consultant to explore the potential for implementing a child-centered benefits management program through House Bill 1598. Through this funding, NH DCYF contracted with Public Consulting Group (PCG) to conduct an assessment of the state's existing program, research and document the principles and practices that are central to a child-centered benefits management program, assess the fiscal implications of adapting NH's existing program, and lay out recommendations and a possible implementation plan for NH DCYF's consideration.

³ [SSA and ACF Joint Request for Information](#)

METHODOLOGY

LITERATURE REVIEW

PCG conducted a literature review of benefits management programs across the country. Literature specific to child welfare agencies were reviewed to identify key concepts and approaches that are central to effective benefits management programs, and to critically analyze programs across the United States. This literature review also incorporated an assessment of the different trust account options available to NH DCYF.

Table 1. Literature Review Data Sources

#	State Agency
1	Arizona Department of Child Safety: Preserving Children's Benefits Program
2	California Department of Social Services
3	Kentucky Division of Protection and Permanency
4	Massachusetts Department of Children and Families
5	Michigan Department of Health and Human Services Children's Services Agency
6	New York City, New York, Administration for Children's Services
7	Washington, District of Columbia, Child and Family Services Agency: Social Security Income Benefit Conservation

NH DCYF DATA & INFORMATION REVIEW

A mix of quantitative and qualitative data collected via data requests to DCYF, document reviews, and an interview with DCYF staff were used to establish a detailed understanding of NH's existing benefits management system. The information and data provided were reviewed to establish the current business processes that DCYF practices and identify opportunities to develop a more comprehensive child-centered benefits management program. Ascensus guidelines and requirements for the ABLÉ program in NH were also reviewed to provide a clear understanding of the necessary action steps to begin utilizing the program.

Table 2. Qualitative Data Sources

Data Source
Interview with the DCYF Staff on November 6, 2024
Current benefits management program statistics
DCYF program forms, policies, and procedures
Ascensus ABLÉ guidelines and requirements for New Hampshire

COST ANALYSIS

Using data provided by NH DCYF regarding the current program use of funds, as well as the foster care population in New Hampshire, a cost analysis was conducted to provide an understanding of the fiscal impact of transitioning to a child-centered benefits management model and the use of ABLÉ accounts. PCG conducted a cost analysis using multiple hybrid models for DCYF to compare budget options.

RECOMMENDATIONS AND IMPLEMENTATION PLAN

After careful review of all data and information used in this assessment, PCG crafted recommendations and an accompanying implementation plan for use by NH DCYF as the agency continues its efforts toward establishing a child-centered benefits management model.

FINDINGS

OVERVIEW OF A HOLISTIC CHILD-CENTERED BENEFITS MANAGEMENT PROGRAM

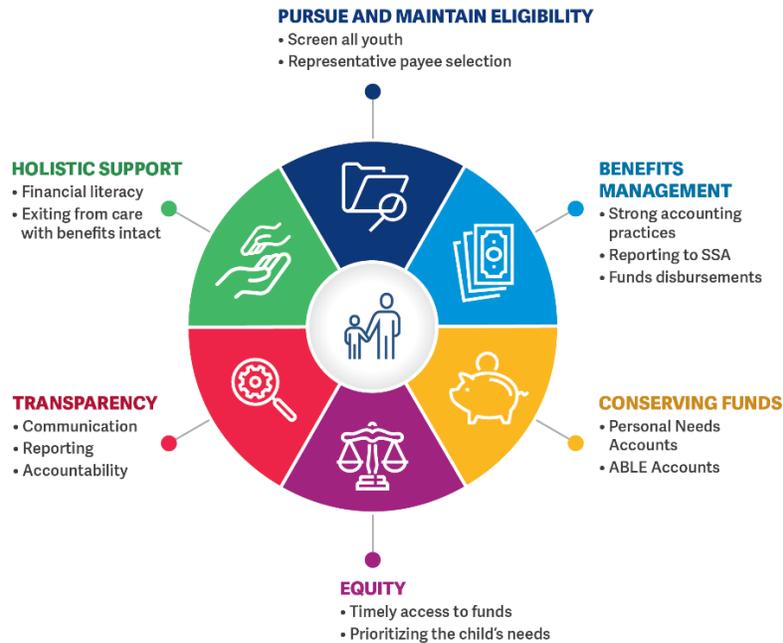
A child-centered benefits management program focuses on ensuring that decisions regarding a child's Social Security benefits are made with the child's best interests as the primary consideration. Here are the key principles of such a program:

1. **Pursue and Maintain Eligibility:** Maintaining SSI benefits can provide a sense of stability for children in foster care, especially as they transition out of the system. This continuity can help them better manage their health and financial needs as they move toward independence.
2. **Timely Benefits Management Practices:** The program ensures that the child's immediate and long-term needs are met. This includes using benefits to cover essential expenses in real time for things that DCYF or Medicaid would not otherwise pay for.
3. **Conserving Funds for Future Use and Permanency:** Conserving the benefits through a financial tool that can be available for the child's future, that can support reunification plans or provide resources to youth who are aging out of foster care by providing them with resources they can use for things like housing, education, transportation or other significant expenses. The program adheres to federal regulations and guidelines to maintain the child's eligibility for benefits. This includes managing the child's funds utilizing tools like an ABLE account or saving allowable funds in a Personal Needs account.
4. **Embed Equity in all Program Policies, Procedures, and Practices:** Ensuring equity means that all children, regardless of their background or circumstances, have fair access to the benefits they need. This helps to address disparities and ensures that every child receives the support necessary for their well-being. Equity also allows for the customization of benefits to meet the unique needs of each child. Children in foster care often have diverse and complex needs, and an equitable approach ensures that resources are allocated in a way that best supports their individual situations.⁴
5. **Holistic Support:** Beyond financial management, a child-centered approach includes providing additional support services, such as educational support and life skills training, to help the child manage their benefits successfully.
6. **Transparency and Accountability:** The program maintains transparency to all relevant parties regarding the child's benefit and in how funds are used and ensures accountability through regular communication, audits, and reporting. This helps build trust and ensures that funds are used appropriately.

By focusing on these principles, a child-centered benefits management program aims to provide comprehensive support to children in foster care, helping them achieve better outcomes and permanency both during and after their time in out of home care. Figure 1, below, is a visual depiction of the principles of a child-centered benefits management program.

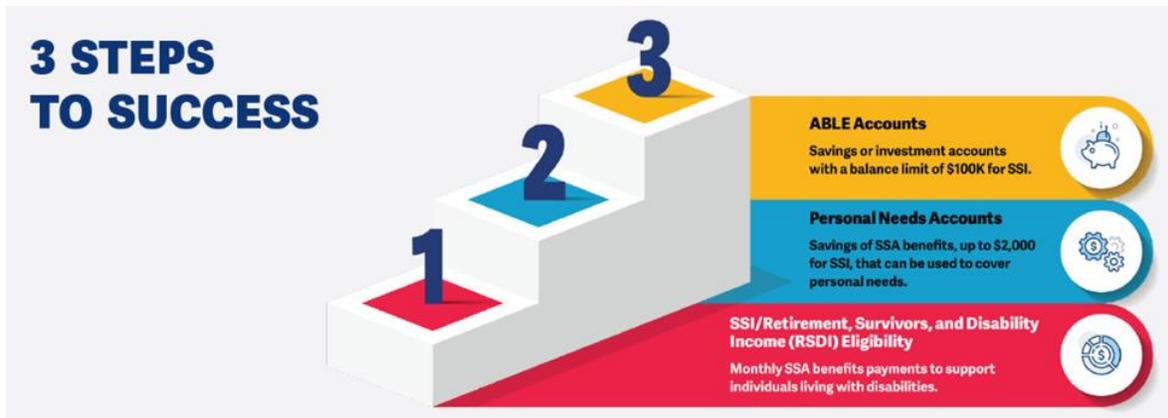
⁴ <https://blog.ssa.gov/social-securitys-equity-action-plan/>

Figure 1. Child-Centered Benefits Management Program Model



Additional details on the key components of child-centered benefits management programs are listed below and include:

- ✓ Pursuing and maintaining SSI and RSDI eligibility for all potentially eligible youth in foster care, regardless of other funding sources like Title IV-E. This includes screening children for existing benefits when a child enters out of home placement and once annually thereafter.
- ✓ Establishing a personal needs account that can be used as an easily accessible account to cover a child's personal expenses that are not already covered by the child welfare agency.
- ✓ Establishing an ABL account for SSI recipients, in addition to their personal needs account. An ABL account is a tax-free savings account that can be used to cover qualified disability expenses, including education, housing, transportation, job support and training, prevention, and wellness. ABL accounts can be used to conserve Social Security Income (SSI) benefits above the SSI program's \$2,000 income and resource limit without impacting eligibility for needs-based programs like SSI and Medicaid.
- ✓ Providing regular communication to workers, attorneys, families and age-appropriate youth to ensure they are aware when benefits are being pursued on behalf of youth, what decisions are made by SSA regarding their benefits, account balances, and how to access funds.
- ✓ Assisting families and transitional age youth with the process of becoming or identifying the appropriate representative payee to continue to receive SSA benefits after leaving foster care.
- ✓ Setting up older youth for success – by providing financial literacy education related to their SSA benefits and assisting youth aging out of care in setting up a bank account and applying to be their own representative payee or identifying an appropriate payee before they age out of foster care. This may include supporting the youth with completing a change of payee applications and filing it with SSA.



Child-centered benefits management effectively addresses the challenges of navigating federal benefit systems by streamlining eligibility screening and application procedures, thereby alleviating the burden on caseworkers and families and making the process more manageable. Additionally, it allows agencies to allocate resources more efficiently, ensuring that children and families have access to the economic support they need for permanency and stability.

REVIEW OF ACCOUNT OPTIONS

As states work to develop and implement child-centered benefits management programs, there are a few different financial tools that can conserve federal benefits for children in foster care. Each tool has different benefits and levels of flexibility that are important to consider when deciding to use one tool over another. Below is a table of three different types of accounts that are commonly used to protect the resources of children and adults with disabilities.

Table 3. Comparison Matrix of Special Needs Trust Accounts, ABLÉ accounts, and Plan to Achieve Self Sufficiency (PASS) accounts

	Special Needs Trust Account	ABLE Account	PASS Accounts
Purpose	Manage and protect assets for individuals with disabilities while preserving their eligibility for public benefits	An ABLÉ account, also known as a 529A account, is a tax-advantaged savings account designed for individuals with disabilities that began before the age of 26, while preserving their eligibility for public benefits	To assist individuals with disabilities in finding employment that reduces or eliminates their need for SSI or RSDI benefits.
Asset Management	Assets placed in the trust are managed by a trustee, who uses the funds to pay for the beneficiary's needs	Assets in the ABLÉ account grow tax-free, and withdrawals for qualified disability expenses are also tax-free. Accounts can be managed by an Authorized Legal Representative or the owner of the account (i.e., the child). For children in foster care settings, DCYF would act as the Authorized Legal Representative until the child turns 18, if the child is willing and able to become their own representative.	Funds in a PASS account can be used for various work-related expenses. To qualify for a PASS, you must be eligible for SSI and have a feasible work goal. The plan is managed by SSA and must be approved by SSA.
Legal Protection	The trust ensures that the assets are not counted as part of the beneficiary's personal assets	SSI beneficiaries can have up to \$100,000 without impacting SSI eligibility	Must adhere to general SSI resource limits (\$2,000 for individuals)
Irrevocability	Most special needs trusts are irrevocable, meaning that they cannot be changed or terminated without the permission of the court.	ABLE accounts are considered revocable. This means that the account owner can make changes to the account, such as withdrawing funds or closing the account, without any legal restrictions. This flexibility allows individuals with disabilities to manage their funds according to their changing needs and circumstances.	Revocable but requires a detailed plan and may involve numerous consultations with SSA for effectiveness.
Cost	Initial setup: \$2,000-\$4,000	Initial setup: Typically free Maintenance fees: variable – typically \$25-\$35 / year.	No cost for setting up or administering the account.

	Special Needs Trust Account	ABLE Account	PASS Accounts
	Ongoing maintenance: variable	These fees are covered by account funds.	

Choosing between an ABLE account, a Special Needs Trust (SNT), and a PASS account depends on specific needs and circumstances but there are significant advantages to using an ABLE account including:

- **Ease of setup and management** – ABLE accounts are generally easier and less expensive to set up and manage compared to Special Needs Trusts. Typically, states use SSI funds to cover the minimal expense for maintaining ABLE accounts.
- **Tax Advantages** – Funds in an ABLE account grow tax-free, and withdrawals for qualified disability expenses are also tax-free. This can provide significant savings over time.
- **Control and flexibility** – Individuals with disabilities can manage their own ABLE accounts, giving them more control over their funds.
- **Impact on benefits** – ABLE accounts allow individuals to save money without affecting their eligibility for means-tested benefits like SSI and Medicaid, up to certain limits. This makes it easier to save for future needs without jeopardizing essential benefits.
- **Qualified expenses** – ABLE accounts can be used for a wide range of qualified disability expenses, including education, housing, transportation, and health care. This flexibility can help cover various aspects of daily living and long-term planning.
- **Annual contribution limits** – While ABLE accounts have annual contribution limits (currently \$18,000 in 2024), they are often sufficient for many individuals' needs.

PEER STATE REVIEW

States across the country are at various stages of implementing child-centered benefits management programs based either on legislative requirements or policy. Among the state agencies leading the way in these efforts are the Arizona Department of Child Safety (AZ DCS) and the Massachusetts Department of Children and Families (MA DCF), which have been at the forefront of implementing ABLE accounts and reshaping their benefit management practices. Below is a matrix that compares a range of states based on key program elements, followed by a more in-depth profile of Arizona and Massachusetts.

Table 4. Matrix of Key Components of Child-Centered Benefits Management Programs, by State

Jurisdiction*	Assess all children in foster care for SSA benefit eligibility	Set SSA funds aside in personal accounts up to \$2K	Forgo Title IV-E for some or all children in receipt of SSI	Prioritize assessing older youth for eligibility	Establish ABLE Accounts	Revise policy for using SSA funds to offset care costs
Arizona	✓	✓	✓	✓	✓	✓
California	✓			✓	○	○
Kentucky	✓	○	✓	✓	○	
Massachusetts	✓	✓	✓	✓	✓	✓
Michigan	✓	○		✓	○	○
Washington	✓	○	○	○	○	○
New York City	✓	✓	○	✓	○	✓
Washington, D.C.	✓	✓		✓	✓	✓

✓ = Current process in practice

○ = Under consideration or in process

Peer State Profile: Arizona

The Arizona Department of Child Safety (DCS), with support from PCG, has launched a proactive program to ensure children in foster care receive, manage, and maintain their entitlement to critical benefits, including SSI, RSDI, and Veterans Administration (VA) benefits. This comprehensive program is designed to enhance benefit management, ensuring children remain eligible for critical benefits while in care. It focuses on screening and application completion, ongoing benefit management, 100 percent conservation of funds, regular communication with stakeholders to maximize transparency, and financial literacy education for youth and families.

The key objectives and components of the program are as follows:



- **Screening & Application Management:** Screen youth for benefit eligibility within 60 days of entering care and once annually thereafter; file SSA/VA applications; address denials and manage appeals when necessary.
- **Benefit Management:** Track and report SSI, RSDI, and VA benefits for youth in care; manage Change of Payee (COP) and notify SSA when a child exits care; coordinate with SSA to ensure ongoing benefit support; monitor eligibility for ABLE accounts and assist with transitioning to the new payee; manage hotline inquiries and provide support to families and stakeholders.
- **Financial Management:** Oversee transactions, reconcile accounts, and manage disbursements; open and fund ABLE accounts for eligible youth, allowing savings up to \$100,000 without affecting benefit eligibility.
- **Training & Education:** Provide financial literacy and program-specific training for caregivers and families; develop and distribute educational materials, including user guides and brochures.

To date, over 270 ABLE accounts have been opened, and more than \$2.7 million has been deposited into ABLE accounts, allowing children to save for the future while preserving their eligibility for essential federal and state programs.

Peer State Profile: Massachusetts



The Massachusetts Department of Children and Families (MA DCF), in partnership with PCG, launched an innovative initiative to implement ABLE accounts for eligible individuals. This initiative is part of Massachusetts' broader efforts to mitigate the risk of youth exceeding the \$2,000 limit while fully preserving their SSA benefits. Prior to transitioning to ABLE accounts, MA DCF employed a Care & Maintenance (C&M) account system to allocate SSI and other benefit payments in a way that minimized the risk of exceeding the federal \$2,000 resource limit, which would jeopardize SSI eligibility.

The current benefit management program focuses on empowering youth with disabilities and their families by providing tools and resources to effectively manage SSI benefits through ABLE accounts. This model prioritizes ensuring financial stability; preserving eligibility for benefits; and promoting independence. The key objectives and components of the program are as follows:

- Screen for benefit eligibility as soon as a youth enters care.
- Conserve 100 percent of SSI benefits in PNA and ABLE accounts to maintain eligibility.
- Conserve 100 percent of RSDI benefits in PNAs.
- Open ABLE accounts for individuals receiving SSI benefits or dual benefits (SSI and RSDI).
- Process the transfer of ABLE account ownership, allowing the youth or their new family to become the payee.
- Routinely monitor account balances and provide ongoing benefit management to ensure financial stability and compliance.
- Manage Personal Needs Accounts (PNA) accounts, review requests, and provide disbursements as needed for any unmet needs that the child may have.

To date, 350 ABLE accounts have been opened with deposits of more than \$1.5 million since December 2023. On average, MA DCF opens 15 new ABLE accounts per month and makes monthly deposits exceeding \$250,000 into established ABLE accounts.

ASCENSUS ABLE GUIDELINES AND REQUIREMENTS

Ascensus College Savings Recordkeeping Services, LLC (Ascensus) is a service provider of retirement, education, and disability savings plans for individuals and institutions, and acts as the financial administrator for the ABLE program in New Hampshire. Currently, the ABLE program in NH is open for enrollment for eligible individuals. Below is a table detailing the ABLE program guidelines. Additionally, Appendix A provides screenshots of the Ascensus dashboard for reference.

Table 5. NH ABLE Guidelines

Topic	NH ABLE Guideline
State Account Limit	\$596,925
Annual Contribution Limit	\$18,000*
Program Banking Institution	Fifth Third Bank
Number of Investment Options	7
Program Investment Institutions	6 Target Risk Options with Underlying Investments managed by BlackRock, Schwab, Vanguard, Capital Group-American Funds, and Sallie Mae Bank. Fifth Third Bank provides the 7th Investment Option, a Checking Account Option, that invests 100% of its assets in an FDIC-insured checking account.
Debit or Prepaid Card	Yes
FDIC Insured	Yes
Initial Minimum Contribution	\$25
Required Minimum Contribution	\$1
Annual Maintenance Fee	\$56 (\$14 assessed quarterly) for accounts with paper delivery of confirmations and statements. \$31 (\$7.75 assessed quarterly) for accounts with e-delivery of confirmation and statements.
Debit Card Cost	\$5.00/month
Fees/Restrictions Based on Number of Disbursements	No
Account Roll-Over	May may be rolled over to another ABLE program at no cost.
Withdrawal Transaction Fee	\$0
Out-of-State Residents	Not Accepted
National ABLE Alliance Membership	Yes, NH is a member.
NH ABLE Plan Website	Home The NH ABLE Plan

*This is the federal limit required of all states.

BUSINESS PROCESS REVIEW OF DCYF'S EXISTING BENEFITS MANAGEMENT PROGRAM

NH's existing benefits management program is conducted primarily through two specific units – the Fiscal Unit and the Accounts Receivable Unit. However, these units work in close collaboration with DCYF case workers and other relevant departmental staff to coordinate regarding benefits eligibility, disbursement of money, accounts management, and preparation for discharge whether through permanency or aging out of the system. The Fiscal Unit is responsible for determining and managing benefits eligibility and coordinating with other relevant DCYF staff regarding benefits management. The unit consists of twelve people, eleven of which are full-time employees. These employees include a fiscal supervisor, ten full-time fiscal specialists (one per district office), and a part-time staff person that is specifically dedicated to social security redeterminations. The Accounts Receivable Unit consists of three full-time employees. This unit is responsible for benefits management, including maintaining and accounting for children's benefits accounts for those cases in which the department is the representative payee. The Fiscal Unit and the Accounts Receivable Unit work in close collaboration with each other and with other relevant departmental staff, such as caseworkers, to carry forth the benefits management program outlined below.

Screening and Application Process

- When a child comes into custody of the state, the Fiscal Unit conducts a technical assessment for all possible resources that the child may be eligible for, including but not limited to SSI and RSDI.
- During this initial assessment, the fiscal specialist determines whether the child is currently collecting SSI or another disability benefit. If the child is not currently receiving a benefit, the fiscal specialist runs a "Manual Dx" to confirm and to determine eligibility. The fiscal specialist also works closely with the case worker to determine whether the child could be eligible based on an existing or potential disability.
- During the initial assessment, if a child is determined to be eligible, or potentially eligible, for both Title IV-E and SSI, DCYF determines which benefit will provide the child with more funds and pursues that benefit. The department will forego Title IV-E funding if SSI is more beneficial for the child.
- The fiscal specialists work with caseworkers to assess children for qualifying disabilities. If a caseworker identifies a disability, deceased parent, or other eligibility factor, then the fiscal specialist works with SSA to establish a final determination of eligibility. This communication with SSA happens via mail, email, phone call, or sometimes in-person between the fiscal specialist and SSA representative. SSA provides information about whether a child is already receiving benefits, if an application has been filed previously and denied, reasons for denials. Eligibility information is also stored in the "New Hampshire Empowering Individuals to Get Help Transitioning to Self-Sufficiency" (New HEIGHTS) system, New Hampshire's eligibility management system.
- Fiscal specialists are responsible for managing the entirety of the SSI application process and the representative payee application process.
- If the child's parent is collecting SSI or has a disability, the fiscal specialist communicates with the local SSA representative to determine whether the child would be eligible for this benefit.
- If the child is currently receiving a benefit, and if the child is placed in a licensed foster home, then the fiscal specialist applies for NH DCYF to become the representative payee for the benefit(s) and sends all relevant forms to the SSA office. The fiscal specialist also sends a letter to the parent informing that the department will become the representative payee for the child while in state custody.
- If the child is placed with a relative, the fiscal specialist coordinates with the case worker to support that relative in the process for applying to become the representative payee. The fiscal specialist also informs SSA that this relative will be applying.

- The Fiscal Unit reviews eligibility every six months for all children in state custody, including for children with their own disabilities. Redeterminations are conducted on every child at least once a year. Federal standards related to Title IV-E require redetermination twice annually for children who are eligible.
- If redeterminations identify a child that may be eligible but is not currently receiving a benefit, the fiscal specialist communicates with the SSA representative to verify eligibility. If eligible, the fiscal specialist proceeds with an application.
- If a child transitions to a relative placement while an SSI application is pending, the fiscal specialist sees the application process through to completion but does not submit the application for the department to become the representative payee. Instead, the fiscal specialist will inform the relative that they may apply to become the representative payee and provides support for this process.

Benefits Management Process

- Once the department becomes the representative payee for a child, the department begins receiving the benefits for that child and those monies are deposited into the state's singular account that holds all SSI benefits. Each child is provided their own account number in the Bridges system – an online platform to manage benefits accounts. All Bridges accounts reconcile with the singular benefits bank account. This bank account is not interest-bearing and does not incur bank fees.
- When a child has a need that must be paid for, prior to pulling money from a child's benefit account, the fiscal specialist assesses whether funds are available from other sources. If there are no other funding sources available, the money may be drawn from the child's benefit account.
- Case workers reach out directly to the fiscal specialist when a child has a need, and coordinate with the fiscal specialist to manage disbursements. Typically, the foster parent covers the cost of the need upfront and submits receipts for reimbursement out of the benefits account. However, if the cost is too great, the fiscal specialist can assist with covering the cost up front, directly using funds from the account.
- Disbursements are approved by the fiscal supervisor. In some cases, disbursements may also require the approval of a field administrator in the district office. Approvals are then sent the Accounts Receivable Unit.
- Using a Balance After Reimbursement report out of the Bridges system, the Accounts Receivable team and the DCYF Administrator routinely monitors accounts to ensure that the \$2,000 maximum threshold for SSI is not reached. Case workers are also able to see benefits accounts for the children on their caseloads in order to monitor their benefit accounts. When a child's account is approaching the \$2,000 threshold, Accounts Receivable informs the DCYF Administrator and the appropriate fiscal specialist, who in turn collaborates with the child's caseworker to assess the needs of the child and how to best use funds to meet those needs and keep the account below the \$2,000 maximum.
- When a child leaves the custody of the state, if reunifying, the Fiscal Unit sends the necessary documentation to SSA indicating that the child has left care. This unit also returns any excess benefits money to SSA. This amount is prorated based on the day of the month that the child left care.
- Upon reunification, the fiscal specialist works with the caseworker to inform the family about the process for applying to become the representative payee for the child's benefits.
- For children in care that are approaching 18, the caseworker collaborates closely with the fiscal specialist and the Accounts Receivable team to begin using benefits to purchase items that the child will need once they leave the system.
- As early as six months prior to a child turning 18, the Accounts Receivable Unit places a hold on the child's account in order to preserve as many funds as possible for the child to have upon exit from care.

However, the team still carefully monitors to ensure that the account does not reach the \$2,000 maximum. In addition, the fiscal specialist will work with the case worker to determine whether the child will be capable of becoming their own payee upon turning 18. If yes, the fiscal specialist and case worker assist the child with that application process.

Communication and Training

- The existing benefits management program relies heavily on strong relationships, collaboration, and communication between the Fiscal Unit, the Accounts Receivable Unit, and the case management team.
- Case workers receive some training on potential benefits for youth as a part of their core training at the start of their employment. They also receive refresher trainings on benefits available to children in care who meet eligibility requirements.
- The Fiscal Unit has an internal trainer that provides initial and ongoing training to the department regarding availability of benefits, eligibility, and benefits management.
- The Accounts Receivable Unit also conducts trainings internally for the unit team.
- According to departmental staff feedback, there are opportunities to strengthen collaboration and collaborative training opportunities across departments within the agency.

Program Strengths

There are a number of notable strengths in NH DCYF's existing benefits management program as a result of the agency's preexisting commitment to centering the best interest of the child in its benefits management model. These strengths will be foundational to expanding and adapting toward a child-centered program. There will be an additional level of effort required in order to enhance these strengths and existing practices to align with best-practice for a child-centered benefits management program. Existing program strengths include:

- ✓ ***A process for identifying the most appropriate representative payee.*** The existing program carefully considers, on a case-by-case basis, the most appropriate representative payee for a child receiving benefits. For children being placed in kinship settings, the department does not seek to become the payee, and instead works with the appropriate caseworker to provide the kinship caregiver with information about how to apply to become the representative payee. The department also supports older youth with the process of becoming their own representative payee, when appropriate, as they approach 18.
- ✓ ***Efforts to maximize the funds available to a child.*** NH DCYF has a strong disbursement process in place that allows caseworkers to access funds for a child's needs that may not be considered a typical cost of care. Additionally, when a child is dually eligible, DCYF carefully considers whether the child would benefit more from SSI or Title IV-E funding. When SSI provides more direct benefit to the child, the department foregoes Title IV-E funding. However, the department does still use SSI funds to offset the cost of care for the child.
- ✓ ***Preservation of funds for older children.*** The existing program protocol places a hold on accounts up to six months prior to a child turning 18 in order to conserve as many funds as possible for the child upon exit from care. The Accounts Receivable unit and the DCYF Administrator monitor these accounts to ensure that the \$2,000 maximum threshold is not exceeded during this time.
- ✓ ***An existing financial management tool.*** NH DCYF currently uses the Bridges software to manage child benefit accounts. This software is also used for accounting purposes. While this software was described as not being user friendly, the existence of this tool and staff familiarity with using and navigating the software is a benefit to the direction of the program.

- ✓ **Financial Literacy access.** Older children have access to some financial education and other life skills education through the Life Skills training program by Youth Villages.
- ✓ **Comprehensive staff training.** Case workers and other relevant staff receive training on available benefits and the process for accessing those benefits. The fiscal unit has an internal trainer, and the accounts receivable unit also conducts internal training on the benefits management program.
- ✓ **Supportive State Legislation.** In July 2024, NH state legislation was passed allowing DCYF to hire a consultant to complete this assessment. Further demonstrating support for adapting financial and benefits policies that are child-centered, in January 2024, state legislation was passed that allows children in foster care who are at least 16 years of age to open their own bank account. The goal of this legislation is to increase access to resources and support youth in developing financial literacy skills as early as possible. While additional research and planning are necessary to ensure that this policy does not hinder access to SSI benefits for eligible children, these efforts more generally demonstrate a commitment to child-centered practices.

Program Gaps and Opportunities

While there are several existing program strengths, there are necessary programmatic adaptations and/or enhancements that NH DCYF must consider in the pursuit of developing a comprehensive child-centered benefits program. These necessary changes will require a significant level of effort, leveraging existing resources and adding additional resources to carry out the implementation and ongoing operations of the child-centered benefits management program. These opportunities include:

- ✓ **Establish a comprehensive screening process** to connect children to benefits that they are entitled to. Currently, NH DCYF is only identifying 4 percent of their out-of-home care population as eligible for SSI. Nationally, states typically find that an average of 12 percent of children in out-of-home placements are eligible to SSI. According to Congressional Research Service report, researchers studying a nationally representative sample of children placed in out-of-home care following a child abuse or neglect investigation estimated that more than 20 percent had physical or mental health conditions that, due to their severity, duration, or risk of death, would likely qualify them for SSI.⁵ This screening process must include a medical assessment as well as a technical financial eligibility review to identify children who may qualify for SSI or RSDI.
- ✓ **Collaborative training and information sharing.** Feedback collected from interviews with NH DCYF staff indicated that there are opportunities for strengthening collaboration between units both around training and information sharing.
- ✓ **Use of ABL program accounts.** NH DCYF does not currently use ABL program accounts for eligible youth, and this should be considered moving forward as a component of ensuring that as many funds as possible are available to and conserved for youth in the custody of the state.
- ✓ **Begin holding SSI and RSDI benefits in an interest-bearing account.** The SSA requires that any SSI and RSDI benefits held by the state in its capacity as representative payee must be kept in an interest-bearing account. Currently, these monies are held in revolving accounts that are not interest-bearing.
- ✓ **Expand financial literacy education.** Although youth in the custody of NH DCYF do have access to some financial literacy education, expanding on existing resources would be beneficial. More specifically, it is important to provide all eligible youth with detailed education and support related

⁵ [Congressional Research Service. \(2021\). *Children in Foster Care and Social Security Administration Benefits: Frequently Asked Questions.*](#)

to SSA benefits and ABLE accounts. Additionally, materials should be established to support families in preparation for reunification. Preparing families for how to access and successfully manage benefits and other resources may reduce the risk of financial challenges impacting the stability and well-being of children and families.

IMPACTS OF DEVELOPING A CHILD-CENTERED BENEFITS MANAGEMENT PROGRAM

Cost Analysis and Fiscal Impact

In order to thoroughly understand the potential fiscal impact of adopting a child-centered benefits management program in which benefits are fully conserved, NH DCYF requested two cost analyses:

1. To compare different approaches to conserving SSA funds for foster youth to review from a budget perspective the impact of conserving 100% of SSA benefits compared to other hybrid models.
2. To determine the potential reduction of Title IV-E dollars if NH DCYF were to apply for and collect SSI instead of claiming for Title IV-E maintenance.

The total estimated budget impact to DCYF to implement a child-centered benefits management program that conserves 100 percent of children’s benefits is \$6,124,378 in the 2026-27 Biennial Budget if contracting with a vendor such as PCG. **If New Hampshire chooses to complete this work internally, to calculate the cost, NH will have to add the cost of 8 new FTEs** in the 2026-27 Biennial Budget. These estimates account for both lost revenue from SSI/RSDI and Title IV-E as well as the personnel resources required to discontinue the current practice of utilizing public benefits to reimburse the agency for the cost of providing for the care of children and youth while placed out of home and to begin conserving those benefits for the child's future needs. Below is a table that visualizes the components of the two calculations.

The total fiscal impact to NH DCYF general fund is \$6,124,378 for the biennial budget

Table 6. Total Fiscal Impact of Implementing a Child-Centered Benefits Management Program, Conserving 100% of SSI/RSDI Benefits

Category	Total
Lost SSI/RSDI Revenue	\$2,177,112
Lost Title IV-E Revenue	\$283,627
Implementation Cost	\$280,300
Ongoing Operations	\$461,300
Year 1 Budget Impact <i>(lost revenue, implementation, and year one ongoing operations costs)</i>	\$3,202,339
Year 2 Budget Impact <i>(lost revenue and year two ongoing operations costs)</i>	\$2,922,039
Total Biennial Budget Impact	\$6,124,378

Like many states, New Hampshire currently utilizes Supplemental Security Income, Survivors, Retirement, or Disability Insurance benefits, and other public benefits due to children and youth in foster care to reimburse the state for their care. Although states are legally permitted to utilize benefits to pay for the cost of care, this is not in the child's or youth's best interest. Children and youth exiting DCYF care and custody face economic hardship that could be mitigated with financial resources. Financial hardships on the part of a family often make it harder to reunite children with their families and support them to achieve permanency, especially when they have disabilities.

Each month, DCYF collects about \$181,426 per month in revenue from approximately 290 children and youth with disabilities or who have a deceased parent out of their RSDI benefits. DCYF currently uses a large portion of these funds to pay for the cost of the youth's care while in out of home placements. Without this funding, DCYF will need to continue its current policy and practice to reimburse the agency out of public benefits due to children and youth who are placed into its care and custody. Children and youth exiting these systems of care would not have access to valuable resources that could support their reunification with their families and meet their needs when they leave care. The information that follows provides a detailed overview of the results of the cost analysis.

Conserving SSA Benefits

The current foster care population in NH is approximately 1,523 children and youth. Using FY2024 data, DCYF serves as the representative payee for approximately 78 children who are eligible for SSI and are dually eligible for SSI and RSDI. Additionally, DCYF serves as the representative payee for approximately 212 children who are eligible for RSDI only. Using the 2025 Federal Benefit Rate (FBR) of \$967 per month, on average this would total approximately \$75,426 in SSI benefits and \$106,000.00 in RSDI benefits received by the department on a monthly basis. **Annually, this results in a combined total of \$2,177,112 in lost SSI and RSDI revenue.**

Currently, DCYF prioritizes using SSA benefits to pay for additional expenditures requested on behalf of the child by their caseworker to cover expenses DCYF would not otherwise pay for to support the child's current needs. The balance of a child's benefits is then used to pay for the cost of care and maintenance. All remaining benefits are then conserved and returned to SSA when a child leaves foster care. Remaining balances are generally created when the monthly cost of care and maintenance is less than the SSA benefit amount. DCYF conserves 100% of Dedicated Account Funds that are returned to SSA when child leaves foster care.

For the model approaches below, PCG used a base line of \$2,177,112 in annual benefits to compare the current amount of benefits that support paying for the cost of care and maintenance compared to each hybrid example.

Model One: Conserve 100% of SSA funds.

- Conserve 100% of SSA benefits for children/youth
- Continue the practice of using some of the benefits to pay for additional expenditures requested by caseworkers
- Set up ABLÉ accounts for SSI children whose regular bank balance exceeds \$2,000

Model Two: Conserve a percentage of SSA funds. Conserve 50% of SSA benefits for children/youth

- Continue the practice of using some of the benefits to pay for additional expenditures requested by caseworkers
- Set up ABLÉ accounts for SSI children whose regular bank balance exceeds \$2,000

Model Three: Conserve funds for older youth only. Use SSA benefits to pay for the cost of care and maintenance for children/youth from the age of 0 to 13 years.

- Conserve 100% of SSA benefits for children/youth from the age of 14 to 21 years.
- Continue the practice of using some of the benefits to pay for additional expenditures requested by caseworkers
- Set up ABLÉ accounts for SSI children whose regular bank balance exceeds \$2,000.

Model Four: Conserve RSDI and partial SSI for older youth while maintaining funds for placement costs.

- Conserve 100% of RSDI (only) benefits for children/youth
- Conserve 50% of SSI benefits for children/youth ages 0 to 13 years.
- Conserve 100% of SSI benefits for children/youth ages 14 to 21 years.
- Continue the practice of using some of the benefits to pay for additional expenditures requested by caseworkers
- Set up ABLE accounts for SSI children whose regular bank balance exceeds \$2,000

Table 7. Projected Total Budget Impact by Model Approach

Model Approach	Total Budget Impact
Model One: Conserve 100% of SSA Benefits	(\$2,177,112)
Model Two: Conserve 50% of SSA Benefits	(\$1,088,556)
Model Three: Conserve 100% of SSA Benefits for Youth Aged 14-21	(\$1,367,388)
Model Four: Conserve 100% of RSDI, 50% of SSI Benefits for Youth Aged 0-13, and 100% of SSI Benefits for Youth Aged 14-21	(\$1,950,834)

Estimation Of Potential Lost Title IV-E Revenue

PCG estimates a range from \$250,000 to \$350,000 in annual lost Title IV-E Maintenance dollars from the estimated amount DCYF is currently claiming, as a result of implementing the child centered benefit program outlined in this report.

Per the data provided by DCYF, there are currently 299 youth who receive Title IV-E Maintenance payments. The estimated average monthly placement cost for those youth is \$1,277.60. Using the FMAP rate of 50 percent, DCYF can claim half of the placement cost.

Of the 299 Title IV-E youth, 12% or 36 youth are likely to be SSI eligible.

- Placement cost for the likely SSI eligible youth is 36 youth x \$1,277.60 per month x 12 months = \$551,923.20 annually
- The estimated claimable Title IV-E dollars that would go away after applying the 50% FMAP equals \$275,961.60 annually.

Note on Potential Cost Impact of Future Title IV-E Claiming for Qualified Residential Treatment Programs:

NH DCYF has the opportunity to claim additional Title IV-E funds for eligible youth and children who are in Qualified Residential Treatment Programs (QRTPs). The department intends to begin claiming for these costs once the necessary policies and procedures are operationalized. Claiming Title IV-E for eligible children and youth in QRTPs will bolster the state’s revenue to assist with covering the cost of out-of-home placements and may offset the fiscal impact of the child-centered benefits management program. The department should therefore prioritize efforts to operationalize the necessary documentation and other practices that are required for claiming Title IV-E for these placements.

Claiming Title IV-E for eligible children and youth in QRTPs will bolster the state’s revenue to assist with covering the cost of out-of-home placements and **may offset the fiscal impact of the child-centered benefits management program**

While expanding Title IV-E claiming will generate more revenue for the state, foregoing Title IV-E funds in order to claim and conserve SSI benefits for those children that are dually eligible will reduce this revenue to some degree. There is not enough data currently available for PCG to calculate an estimate for the total Title IV-E revenue that may be generated. It is important to note that this fiscal projection is not included in the total budget impact calculation because the state is not currently claiming IV-E for its residential placements, including those that are or may become QRTP credentialed. Once DCYF understands the total amount of additional Title IV-E that could be claimed for eligible QRTP placements in future years, the estimated dollar amount provided below should be subtracted from the total estimated QRTP Title IV-E claiming based on the number of dually eligible youth in QRTP placements. PCG used the following data points to establish the estimate below:

- Residential placement daily rates* (avg. \$231.66),
- The state's Title IV-E penetration rate (20.44%),
- The state's rate of children in out-of-home placements receiving SSI benefits (12%), and
- The state's current Federal Medical Assistance Percentage (FMAP) rate (50%)

Using these figures, PCG estimates that, if conserving 100 percent of SSI benefits for eligible children, the state will forego an annual \$349,466 in Title IV-E funds for children in QRTPs that are dually eligible for Title IV-E and SSI. In other words, the total amount of potential Title IV-E for QRTP placement would be reduced by \$349,466 due to the amount of youth likely eligible for SSI. This estimate is based on the premise that DCYF will soon be able to claim for 100 percent of Title IV-E eligible children in QRTPs. However, it is unclear when the state will be able to start claiming for these costs or the percentage of eligible children that costs will be claimed for once claiming is operationalized. The broader cost analysis presented in this report is based upon the departments benefits management program as it currently stands, which does not include claiming of Title IV-E costs for children in QRTPs.

**Daily rates for residential placements vary greatly from as much as \$1,310 to as little as \$135. PCG calculated an average daily rate across all residential placement rates.*

RECOMMENDATIONS

While NH DCYF has several policies and practices in place that are essential to a child-centered benefits management program, there are a number of opportunities to strengthen and expand those practices toward the goal of a truly holistic child-centered program. PCG's recommendations are provided below.

SCREENING AND APPLICATIONS

Establishing a well-documented screening process, defined in policy and operationalized through procedures, is the first step in establishing a strong child-centered benefits management program. NH DCYF has already developed and established a robust technical screening and application process. However, steps should be taken to thoroughly review the current processes and make updates as needed to align with state legislative requirements and best practice. More specifically, NH DCYF should focus on establishing a comprehensive approach to disability assessment in order to identify more youth that may be eligible for benefits. Screening children in foster care for Social Security benefits involves several best practices to ensure they receive the economic support they need to achieve permanency and improved well-being. PCG recommends that NH DCYF:

- **Strengthen Screening Process:** Begin screening children for eligibility as early as possible, prioritizing youth aged 17 and over that are preparing to transition out of care and continuing annually. This helps identify those who may qualify for benefits due to disabilities or other criteria. The proposed NH legis-

lation requires that screenings be conducted within sixty days of a youth coming into care. The legislation also requires an annual eligibility review for all children in care. NH DCYF should establish practices in accordance with these proposed standards.

- **Standardize Approach to Foregoing Title IV-E for SSI Benefits:** DCYF already reviews potential a child's benefits on a case-by-case basis and determines whether Title IV-E or SSI would be most beneficial for a given child, foregoing Title IV-E where this appears to be in the child's best interest. However, DCYF should consider standardizing the approach to foregoing Title IV-E funds to ensure equity amongst all the children the department serves. DCYF should consider foregoing all Title IV-E benefits for children that are also eligible for SSI benefits to connect the child to the SSI benefits that can continue into adulthood if the child continues to qualify for SSI benefits, providing a more stable long-term financial support system. Choosing between Title IV-E and SSI benefits can have significant long-term implications including supporting permanency for children. While Title IV-E benefits are generally available until the child turns 18 (or 21 in some cases), SSI benefits can continue indefinitely as long as the individual remains eligible. SSI is a more stable source of income over the long term, especially for individuals with disabilities who may not be able to work. SSI benefits also include healthcare through Medicaid. By providing financial stability, healthcare coverage, and access to essential services, SSI benefits can significantly enhance the ability of families to provide a permanent, supportive home for children with disabilities. This, in turn, promotes the overall well-being and long-term success of these children.
- **Conduct Comprehensive Assessments:** Conduct thorough assessments to determine eligibility for Supplemental Security Income (SSI) or Social Security benefits. This includes evaluating physical and mental disabilities and reviewing the child's family history for potential benefits based on a parent's retirement, disability, or death. Additional effort and resources may be needed for DCYF to ensure its SSI unit is able to effectively manage a higher volume of applications with the same amount of rigor that a comprehensive assessment requires. This may include additional training for staff to understand and apply complex eligibility criteria and procedures. Investing in technology to support application processing, data management, and communication. Coordinating with medical professionals, financial institutions, and other agencies to gather necessary information. Regularly reviewing and updating the screening process to address changes in regulations and improve efficiency.
- **Strengthen Coordination with Caseworkers:** Build upon the existing strong relationship between caseworkers and the Fiscal and Accounts Receivable units. Establish practices that support caseworkers to be well-informed and actively involved in the screening process. This promotes program transparency. Caseworkers should be trained to recognize signs of potential eligibility and understand the process for making a referral for more in-depth screening. Further, caseworkers should be informed about the efforts to establish a child-centered benefits management program, and the important role that they play in that process.
- **Continue Providing Application Support:** DCYF currently provides robust support for completing and submitting applications. This includes helping to gather necessary documentation and ensuring applications are submitted promptly to avoid delays for all application types including initial applications, change of payee applications, income redetermination, continuing disability reviews, reconsiderations, and appeals. PCG recommends that DCYF continue providing this level of support as a priority of a child-centered benefits management program.
- **Strengthen Transition Planning:** As children approach the age of 18, fiscal specialists and caseworkers at DCYF provide some assistance related to understanding the process for maintaining benefits into adulthood. This includes helping them become their own payee or designating an appropriate representative payee. The department should consider ways to strengthen this support through robust financial literacy education, supporting youth to understand the value of their benefits, and assisting the youth in identifying ongoing supports that can provide ongoing assistance related to benefits management.

- **Application Support:** Provide robust support for completing and submitting applications. This includes helping gather necessary documentation and ensuring applications are submitted promptly to avoid delays for all application types including initial applications, change of payee applications, income re-determination, continuing disability reviews, reconsiderations and appeals
- **Strengthen Data Collection and Transparency:** Improve data collection and transparency to track the outcomes of screenings and applications. This helps identify gaps and areas for improvement in the process.

By following these best practices, DCYF can continue to strengthen its support of children in foster care in accessing the Social Security benefits they are entitled to, aiding their transition to adulthood and improving their overall well-being. While DCYF has an established screening and application process, following the guidelines and enshrining them in policy will result in additional applications, connecting more children to the benefits they are entitled to, and supporting older youth in maintaining their benefits, ultimately reducing hardships faced when transitioning out of foster care.

BENEFITS MANAGEMENT

Proper management of benefits is essential for making sure that children's benefits are used effectively and efficiently, providing the maximum support possible for each youth. This includes managing Social Security benefits, Medicaid, and other financial resources. Below are the areas that DCYF should consider developing policies and procedures as it relates to developing a child centered benefits management program.

- **Conserve RSDI in PNAs:** There are no limits on the amount of RSDI that can be conserved in a PNA meaning that funds can grow without concern for the resource limits that apply to SSI benefits. However, like SSI benefits, it is still necessary to keep detailed records of expenditures and provide regular accounting reports to stakeholders like the youth, the child's attorney, and their case manager.
- **Conserve SSI Using ABLE Accounts:** Conserving children's SSI benefits is a foundational principle of a child centered benefits management program. It is critical for establishing financial security and aids in long-term planning and permanency. While there are a few financial tools that can be used to conserve SSI benefits, there are significant advantages to using an ABLE account. DCYF should consider using New Hampshire's ABLE program to conserve SSI benefits for children in foster care. The ABLE account is the preferred financial tool for conserving SSI funds because of the following:
 - **Ease of setup and management** – ABLE accounts are generally easier and less expensive to set up and manage compared to Special Needs Trusts.
 - **Tax Advantages** – Funds in an ABLE account grow tax-free, and withdrawals for qualified disability expenses are also tax-free. This can provide significant savings over time.
 - **Control and flexibility** – individuals with disabilities can manage their own ABLE accounts, giving them more control over their funds.
 - **Impact on benefits** – ABLE accounts allow individuals to save money without affecting their eligibility for means-tested benefits like SSI and Medicaid, up to certain limits. This makes it easier to save for future needs without jeopardizing essential benefits.
 - **Qualified expenses** – ABLE accounts can be used for a wide range of qualified disability expenses, including education, housing, transportation, and health care. This flexibility can help cover various aspects of daily living and long-term planning.
 - **Annual contribution limits** – while ABLE accounts have annual contribution limits (currently \$18,000 in 2024), they are often sufficient for many individuals' needs. In Washington, the monthly SSI payment is \$943 or \$11,316 annually.
- **Continue and Standardize Consultation Activities for Identifying a Representative Payee:** Identifying a proper representative payee is crucial for ensuring that the beneficiary's funds are used appropriately for their current and future needs, such as food, housing, medical care, and personal expenses.

This helps maintain the beneficiary's financial stability and well-being. It is also critical to protect against exploitation. Representative payees are responsible for managing the funds ethically and in the best interest of the beneficiary. A good representative payee understands the beneficiary's specific needs and circumstances, allowing for more personalized and effective financial management.⁶ DCYF's existing program already consists of efforts to support in the identification of a representative payee. However, efforts should be taken to strengthen and standardize those efforts.

- The Arizona Department of Child Safety (DCS) follows a structured process to identify representative payees for children in foster care:
 - DCS consults with the child, their case manager, and their attorney to determine the most suitable representative payee. This ensures that the child's best interests are considered.
 - If no suitable representative payee is identified, DCS may apply to become the representative payee itself. This involves a thorough review and approval process to ensure compliance with legal and administrative requirements.
 - DCS is required to provide notice to the child, their guardian, and their attorney whenever it applies for benefits on behalf of the child or applies to be the representative payee. This transparency helps maintain trust and accountability.
 - These steps help verify that the financial resources available to children in foster care are managed responsibly and in their best interests.
 - While Arizona's process is effective, the requirement to engage the child's attorney has been challenging to coordinate and the child's attorney is not always the most familiar with the child's day to day needs. PCG recommends that DCYF considers leveraging the child's Family Team Decision Making staff to advocate for the child's best interest when identifying a representative payee.

- **Establish a Robust Disbursement Process:** A robust disbursement process is important to meet a child's immediate, unmet needs while residing in out-of-home placements. Children in placements often have urgent needs and timely access to funds ensures that these needs are met without delay. NH's existing disbursement process is a strong starting point, and PCG recommends a review of the existing process to consider opportunities for strengthening or refinement.

- **Establish a Holistic Approach for Youth to Exit Care with Benefits Intact:** A holistic approach means developing a streamlined process for supporting children who are exiting foster care with their benefits intact and savings established. Funds conserved in a PNA should be returned to SSA to redistribute to the child or the new representative payee. Funds in an ABLE account may be transferred directly to the child or the new representative payee, with SSA's approval. In addition to well established policies and procedures for transferring benefits, the provision of financial literacy resources is another critical component of developing a holistic approach to exit from care.

COMMUNICATION, COLLABORATION, AND INTERNAL TRAINING

Collaboration and program transparency fosters trust among community partners, including participants, case managers, senior leadership, and the community. Access to accurate and relevant information enables individuals to make better decisions. When developing policies focused on communication and training DCYF should consider the following:

- **To maintain transparency and clear communication, notifications to case stakeholders should be when the following activities have been completed:**
 - When screening is completed
 - When applications are filed

⁶ <https://blog.ssa.gov/understanding-the-need-for-a-representative-payee/>

- When SSA decisions are issued
 - When funds are conserved
 - When a PNA or ABLE account is opened
- **Initial and ongoing training for new and seasoned staff, including caseworkers, should include:**
 - Information on potential benefits and related processes,
 - Video tutorials for specific processes like how to request funds on behalf of a child,
 - Frequently Asked Questions guides help to address common questions for frontline staff,
 - Live trainings, and
 - Webinars.
 - **DCYF should establish a dedicated email address, phone number, and team member to manage all questions and inquiries.** This streamlines communication as well as necessary follow-up tasks. Additionally, having a singular team member managing communication and related tasks decreases the likelihood that a necessary task goes uncompleted, or a deadline is missed.
 - **Multiple communications channels should be leveraged to keep staff informed of program guidelines and changes.** DCYF should communicate with the various staff that are involved in the children's benefits management program about their preferred communication mechanisms and channels. DCYF should use this feedback to establish a well-informed strategy for routine communication.
 - **Opportunities for collaborative training, information and knowledge sharing, and problem solving across departments should be established.** These opportunities would strengthen collaboration, coordination, and partnership across the departments that play a role in the benefits management program. Additionally, these activities would strengthen shared knowledge about the program.
 - **Opportunities to engage with and collect feedback from children, youth, and families who have experience with the program should be considered.** Routinely hearing from the individuals that have been most directly impacted by the practices and policies of the benefits management program is essential for making program improvements and adaptations that are most likely to strengthen the experiences and outcomes of children, youth, and families. This should include opportunities to engage individuals with lived experience in routine planning and strategy discussions.

FINANCIAL LITERACY

While NH DCYF has some financial literacy resources available for children in out-of-home placements, including the Life Skills curriculum, DCYF should partner with relevant departmental staff to expand existing resources or to develop new, robust financial literacy programming. More specifically, programming should be expanded to include education about benefits eligibility and management, particularly for older youth.

A good financial literacy program for youth should cover a range of essential topics and skills to help them manage their finances effectively. Financial literacy training may contribute to economic stability by promoting responsible financial behavior and reducing the incidence of financial crisis. DCYF should consider:

- **Developing curriculum targeting older youth, ages 14+.** Starting financial literacy training at 14 years of age can have numerous benefits, setting the foundation for responsible financial behavior and decision-making in adulthood. At 14, teenagers are developing cognitive abilities to understand more complex concepts, including financial principles. This age is also a critical period for forming habits and attitudes. Introducing financial literacy early helps instill positive financial behaviors.
 - Programming for older youth should include education about potential benefits, eligibility, and for youth who are eligible, benefits management strategies.

- Developing curriculum targeting younger youth and their families.
- Including topics such as spending, budgeting and financial planning, saving, and practical application and exercises to practice financial skills.

IMPLEMENTATION ROADMAP

Once the report is submitted to the New Hampshire State Legislature and a determination is made on the best path forward for enhancing the department's existing benefits management program, the department will need to develop an implementation plan. Several factors need to be considered when creating the implementation plan, including:

- Defining roles and responsibilities within the team and the potential need for new team members,
- Identifying the necessary resources for successful implementation,
- Establishing monitoring mechanisms to track progress and understand program impact on a variety of stakeholders,
- Developing communication procedures and timeline for the project, and
- Collaborating with relevant stakeholders (PCG, SSA, Ascensus, etc.).

The Department will also need to assess how this initiative aligns with its broader strategic objectives and overall goals. Additionally, any necessary adaptations to policies or processes within other related agencies must be identified and implemented accordingly. This will require partnership and guidance from DCYF.

PHASES OF DEVELOPING THE PROGRAM:

The development of the child-centered benefits management program typically follows two phases:

1. **Implementation Phase:** This phase typically lasts six months, during which the program structure and processes are developed and established.
2. **Ongoing Operations Phase:** This phase continues indefinitely, ensuring the long-term sustainability and improvement of the program.

In the remaining section below, PCG has created a proposed workplan outlining the tasks and milestones for both the Implementation Phase and the Ongoing Operations Phase of the child-centered benefits management program. The cost of contracting these services with PCG is also included in Tables 9 and 10.

Table 8. Proposed Implementation Workplan

Task	Anticipated Timeframe
Project Management	
Facilitate Kick-off Meeting	Within 2 weeks of contract start
Develop Project Management Tools (e.g., project charter, communication plan, updated workplan)	Within 1 month of contract start
Revise / confirm work plan	Within 1 week of contract start
Establish ongoing meeting protocol and frequency	Within 2 weeks of contract start
Ongoing Project Communications	Ongoing
Phase I: Implementation	
Establish communications with internal and external project partners (SSA, Ascensus, etc.)	Within 6 months of contract start
Develop communications including press releases, internal memorandum, intranet announcements, and notification letters for key project partners	
Validate rules and process for opening an entity Authorized Legal Representative account	
Document process for setting up and managing individual ABLE accounts	
Open entity Authorized Legal Representative account with Ascensus	
Open ABLE accounts for current SSI recipients where DCYF is the representative payee with Ascensus	
Fund ABLE accounts	
Assist DCYF with integrating ABLE account management into existing ledger system	
Review major decision points for policies and procedures with community partner workgroup	
Document new policies and procedures to include process flows	
Review and update funds distribution process for youth from both PNAs and ABLE accounts	
Develop and facilitate program overview training for community partners such as case managers	
Phase II: Ongoing Operations	
Operate from established policies and procedures	

Task	Anticipated Timeframe
Define roles and responsibilities	Ongoing from Phase I Completion
Set up ABLE accounts for all new SSI recipients	
Maintain necessary communication, accounting, documentation, and reporting	
Manage Personal Needs Accounts	
Maintain necessary communication, accounting, documentation, and reporting	
Manage foster youth distribution process	
Maintain necessary communication, accounting, documentation, and reporting	
Provide regular notification and communication monthly to necessary community partners	
Manage the representative payee process	
Maintain necessary communication, accounting, documentation, and reporting	
Manage centralized (1-800 number and email account) inquiries and trouble shoot with DCYF and SSA as necessary	
Keep log of inquiries and outcomes	
Prepare and conduct auditing functions on established regular frequency	
Conduct monthly reconciliations for each accounting function	
Provide regular social worker, program and other department trainings	
Conduct monthly program performance reporting	

The proposed implementation budget that follows is based on the number of FTEs the state would need to add in addition to their existing resources, or the projected cost if the state were to choose to work with a vendor to complete this work. The proposed roles and scope of work ensure the effective implementation of a comprehensive child-centered benefits management program. It integrates both existing and new functions, includes the development of policies and procedures, and establishes process workflows. The cost is a one-time fee of \$280,300 for the six-month implementation phase if the department chooses to work with a vendor. If the department chooses to complete this work internally, the table below provides the estimated number of full-time employees (FTEs) that the department would need to hire in addition to their existing resources to complete this work successfully.

Table 9. Proposed Phase 1 Implementation Budget

Roles (# of additional FTEs DCYF would need to effectively implement the program without a vendor)	Role Description	One-Time Cost (to Contract with a Vendor for Phase 1)
Senior Management (2 FTEs)	Responsible for providing oversight to contract and resource management	\$280,300
Project Manager (1 FTE)	Responsible for leading and coordinating groups and implementation tasks to ensure all activities are on track and are completed timely	
Operations Manager (1 FTE)	Oversight of onboarding operations staff, training and implementation of policy and procedures for all work groups	
Consultant (2 FTEs)	Responsible for drafting materials and documents, collection of data, and providing support to project managers and the state with implementation tasks	
Operations Analyst (1-2 FTEs)	Implementation of roles and responsibilities, transition to ongoing operations	

Phase Two of the development of New Hampshire's child-centered benefits management program shifts the focus from implementation to ongoing operations. The proposed budget below provides the number of FTEs the state would need to add to its existing resources to complete this work, or the cost to work with a vendor. This phase includes completing program activities, streamlining the newly developed processes, and enhancing and refining program performance. This phase of the program will focus on key areas including communications to stakeholders, representative payee identification, ABLE account opening and management, monthly reporting of all program metrics, and administration of financial literacy training. The proposed cost is an annual fee of \$461,300 if the department chooses to contract with a vendor. If the department chooses to complete this work internally, the table below provides the estimated number of full-time employees (FTEs) that the department would need to hire in addition to their existing resources to complete this work successfully.

Table 10. Proposed Phase 2 Ongoing Operations Budget

Role (# of additional FTEs DCYF would need to effectively implement the program without a vendor)	Description	Annual Cost (to Contract with a Vendor for Ongoing Operations)
Senior Management (0.5 FTE)	Responsible for providing oversight to contract and resource management	\$461,300
Project Manager (1 FTE)	Responsible for leading and coordinating groups and implementation tasks to ensure all activities are on track and are completed timely	
Screening and Applications Specialist (1-2 FTEs)	Responsible for screening and filing applications for all children in out-of-home placement, reviewing and filing appeals, and reporting	
Operations Analyst (1-2 FTEs)	Responsible for the management of ABLÉ accounts, conducting representative payee consultations with case stakeholders, managing a centralized communications hotline, facilitation of disbursement for children, assisting youth and families with the change of payee process, annual accounting, and supporting the DCYF Accounts Payable unit and data collection	
Financial Literacy Specialist (.5 FTE)	Responsible for developing and administering financial literacy training to children, youth, and families in advance of transitioning out of care. Curriculum will be specific to Social Security benefits and general money management skills.	

Appropriately managing Social Security benefits on behalf of children in the care of a state child welfare agency is complex. To implement a child-centered benefits management program and conduct ongoing operations would require the state to hire approximately six new FTEs to support the existing staff. Alternatively, contracting with a vendor will cost the state approximately \$741,600 for implementation and one year of ongoing operations. A vendor would also be able to provide critical subject matter expertise and more flexible resources. It takes a significant level of effort to administer, especially when agencies adopt a child-centered approach. However, with good process in place, the programmatic benefits can better outcomes for New Hampshire children and families. This is particularly true over the long term, as children exiting care will be less likely to experience future challenges related to lack of available resources, such as persistent poverty and housing instability.

APPENDIX A. ASCENSUS ABLE PLATFORM IMAGES

FIGURE 1. ASCENSUS ABLE ENTITY MANAGEMENT DASHBOARD REGISTRATION PAGE

 Plan Logo

Entity Management Dashboard Registration

Entities serving as an Authorized Individual can start opening, managing and viewing Accounts once the registration has been submitted and approved by the Plan.

3 EASY STEPS TO BEGIN

- 1 Create the **Control Person's** login credentials
- 2 Enter the Entity's information
[What is an Entity?](#)
- 3 Review, submit, and log in to your Dashboard to complete registration for approval

Get a head start and notarize the required **Entity Certification Form** prior to completing the Entity Registration.

Already registered? [Log In](#)

CONTROL PERSON INFORMATION

This email address will be used to log in

Continue

 **Need help?** Contact Customer Service at
(123) 456-7890, M-F 8am-5pm ET.

Plan Disclosure Booklet
Privacy Policy
Security Policy
National ABLE Alliance
Contact Us

FIGURE 2. ASCENSUS ACCOUNTS MANAGEMENT DASHBOARD PAGE

Entity Management Dashboard

Search... [Export Account List](#)

NAME	ACCOUNT NUMBER	SSN	STATUS	BALANCE
Jane Smith	123456789-00	****3235	Action Needed As of 00/00/0000	\$0.00
Zanyiah Ponce	123456789-01	****9934	Account Freeze As of 00/00/0000	\$0.00
Demetrius Faulkner	123456789-02	****8602	Account Freeze As of 00/00/0000	\$0.00
Iyana Knox	123456789-03	****7201	Account Freeze As of 00/00/0000	\$0.00
Jaylyn Schroeder	123456789-04	****3351	Pending Review As of 00/00/0000	\$0.00
Hayden Dyer	123456789-05	****0074	Active As of 00/00/0000	\$7389.00
Eliza Pearson	123456789-06	****5353	Active As of 00/00/0000	\$40300.00
Zavier Hanon	123456789-07	****4635	Active As of 00/00/0000	\$100368.00
Arjun Herman	123456789-07	****5444	Active As of 00/00/0000	\$3000.00
Randall Kerr	123456789-07	****9086	Closed As of 00/00/0000	\$6400.00

Showing 1-10 of 60 entries

[Plan Disclosure Booklet](#) [Privacy Policy](#) [Security Policy](#) [National ABL Alliance](#) [Contact Us](#)

Figure 3. Ascensus ABL Platform Entity Information Page

ENTITY INFORMATION

Tell us about the Entity

Please enter the Entity's information

Name of Entity: Acme Organization

Entity Type: State or Government

Entity Email Address: support@acmeorg.com

Entity Phone Number: 555-555-5555

Entity TIN: 000-00-0000

Confirm Entity TIN: 000-00-0000

Entity Permanent Street Address

Street Address: 123 Street Road

Street Address Line 2 (optional): STE. 4

City: City

State: AA

Zip Code: 12345

Check this box if the Entity mailing address is different from the permanent address. If this box is left unchecked, the Entity's permanent address will be used as the mailing address for Account-related information.

How would this mailing address be used?

Plan Logo

- CONTROL PERSON INFORMATION
Enter the Control Person's login credentials
- ENTITY INFORMATION
Enter the Entity information
- REVIEW AND SUBMIT
Edit, review and submit Entity profile

Need help? Contact Customer Service at (123) 456-7890, M-F 8am-5pm ET.

Figure 4. Ascensus ABLE Platform Entity Certification Form Page

The screenshot displays the 'Upload Entity Certification Form' page in the Ascensus ABLE Platform. The interface includes a sidebar on the left with navigation options: 'COMPLETE REGISTRATION', 'FAQS', 'Need help?' (with contact information: (123) 456-7890, Monday - Friday, 8am-5pm ET), and 'Download Plan Forms'. The main content area is titled 'Step 1 of 2 Upload Entity Certification Form' and features a 'Download Entity Certification Form' link. Below the title, users are instructed to upload a notarized form. A large dashed box contains an upload icon and the text 'Drag and drop files here to upload.' Below this, a 'Select files...' button is provided. A warning message states: 'When the Entity Certification Form is submitted to the Plan, the notary seal must be fully visible. If the notary seal is not fully visible, the Plan will contact the Control Person and request that a completed form with a fully visible notary seal be mailed to the Plan.' At the bottom right, there are 'Cancel' and 'Next' buttons. The footer contains links for 'Plan Disclosure Booklet', 'Privacy Policy', 'Security Policy', 'National ABLE Alliance', and 'Contact Us'. The user's name 'Leia Organa' and a 'Log Out' link are visible in the top right corner.

Figure 5. Ascensus ABLE Platform Add Team Members Page

COMPLETE REGISTRATION

FAQS

Need help?
(123) 456-7890, Monday - Friday,
8am-5pm ET

[Download Plan Forms](#)

Step 2 of 2 [See Team Members](#)

Add Team Members

Complete your **Control Person's** profile, and any **Beneficial Owner(s)** who own 25% or more of the equity interests (if none, at least one Beneficial Owner will be required), and at least one **Authorized Representative(s)** who will be granted **Signatory** permissions.

Complete your Control Person profile

Control Person Name
Leia Organa

Are you a Beneficial Owner who owns 25% or more of equity interests within the organization?

Yes
 No

To help the government prevent the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify and record information that identifies each person or Entity who opens, owns, or manages an Account.

Figure 6. Ascensus ABLE Platform Entity Registration Confirmation Page

You've submitted the Entity registration for Plan review!

Submit Entity Information
 Log In and Complete Registration
 Plan Review
 Approved

Thank you for submitting the Entity registration. An email confirmation will be sent to the Entity organizational email address. Please allow up to 7 business days for Plan verification. An email will be sent to the Entity organizational email address when the Entity registration has been approved. If additional information is required, the Plan will contact the Control Person.

[Back To Dashboard](#)
[Print This Page](#)

CONTROL PERSON

First Name	Last Name	Job Title	Email Address	Phone number	SSN	Address
Leia	Organa	CFO	leia@acmeorg.com	555-555-5555	*****4647	123 Street Road City, AA 12345

Permissions
Administrator

BENEFICIAL OWNER

First Name	Last Name	Job Title	Email Address	Phone number	SSN	Address
Han	Solo	CEO	han@acmeorg.com	555-555-5555	*****4647	123 Street Road City, AA 12345

Permissions

Figure 7. Ascensus ABLE Platform "Generate Transactional Report" Page 1

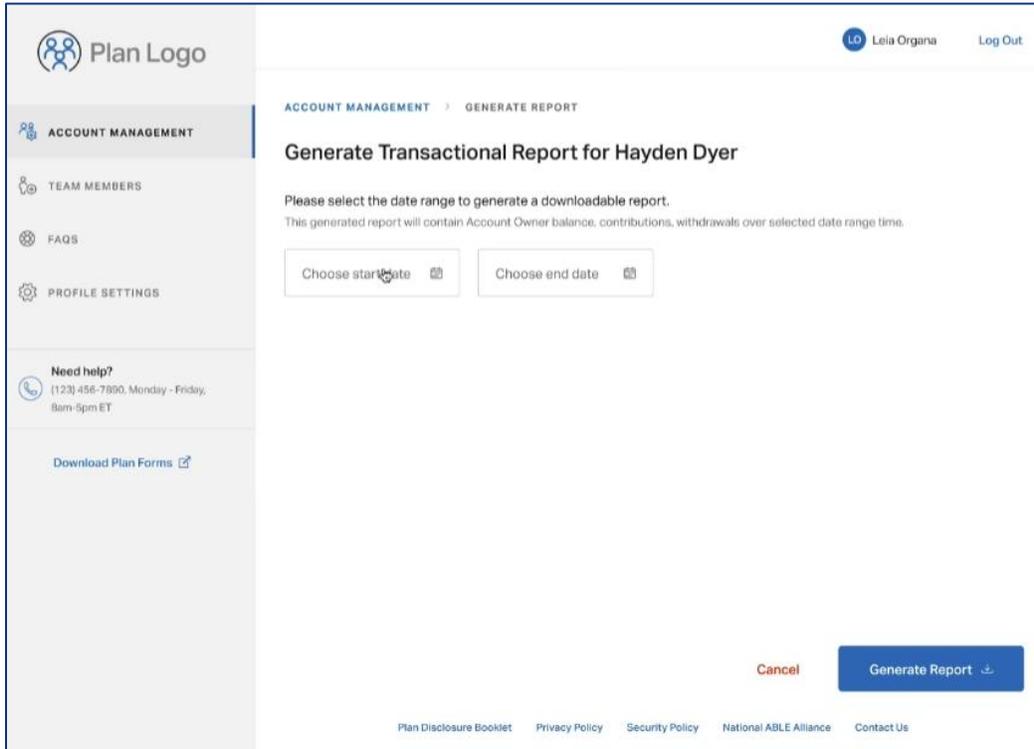


Figure 8. Ascensus ABLE Platform "Generate Transactional Report" Page 2

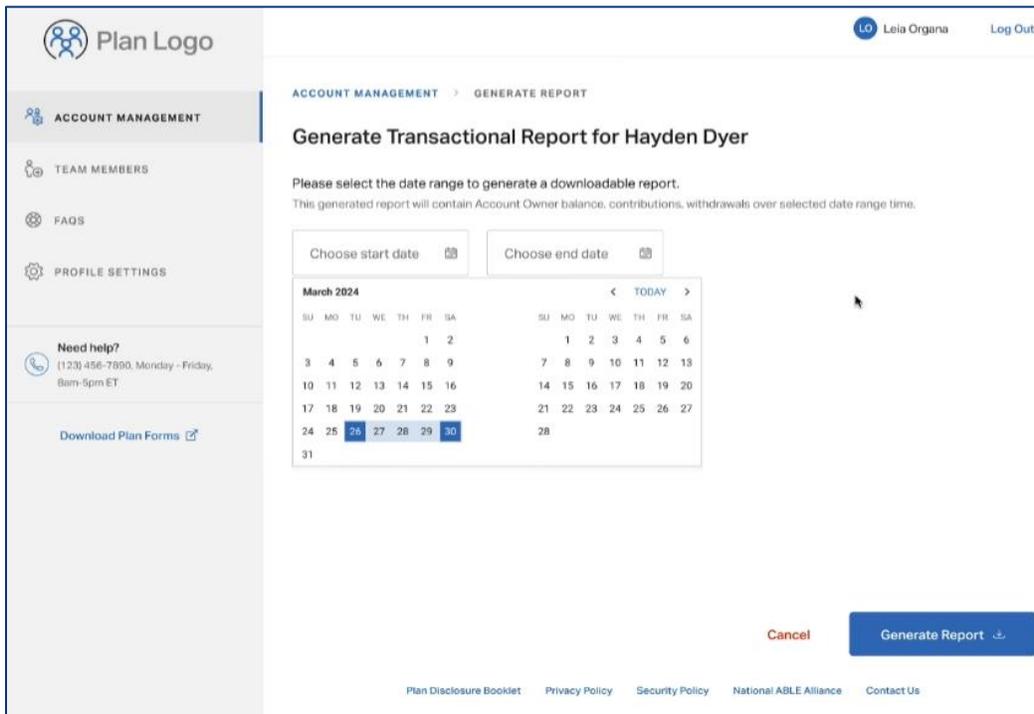


Figure 9. Ascensus ABL Platform Team Members Page

The screenshot displays the 'Team Members' page in the Ascensus ABL Platform. The interface includes a left-hand navigation sidebar with options: ACCOUNT MANAGEMENT, TEAM MEMBERS (highlighted), FAQs, and PROFILE SETTINGS. Below these is a 'Need help?' section with contact information and a 'Download Plan Forms' link. The main content area features a 'Team Members' title, an 'Add Team Member' button, and a 'See Team Members' link. A table lists the following team members:

NAME	EMAIL	ROLE	PERMISSIONS
Anakin Skywalker	anakin@acmeorg.com	Authorized Representative	Signatory ● Pending
Leia Organa	leia@acmeorg.com	Control Person	Administrator
Han Solo	Han@acmeorg.com	Authorized Representative	Team Administrator
Luke Skywalker	luke@acmeorg.com	Beneficial Owner	Read-Only
Obi-Wan Kenobi	obi-wan@acmeorg.com	Authorized Representative	Read-Only

At the bottom of the page, there are links for: Plan Disclosure Booklet, Privacy Policy, Security Policy, National ABL Alliance, and Contact Us.

APPENDIX B. COST ANALYSIS CALCULATIONS

Model 1: Conserve 100% of SSA Benefits							Annual Benefit Amount Conserved	Budget Impact
Benefit Type	% Conserved	Number of Children	Avg Monthly Benefit	Monthly Benefit Amount				
All ages	SSI	100%	78	\$967.00	\$75,426.00	\$905,112.00		
All ages	RSDI	100%	212	\$500.00	\$106,000.00	\$1,272,000.00		
					Monthly	\$181,426	\$2,177,112	(\$2,177,112)

Model 2: Conserve 50% of SSA Benefits							Annual Benefit Amount Conserved	Budget Impact
Benefit Type	% Conserved	Number of Children	Avg Monthly Benefit	Monthly Benefit Amount				
All ages	SSI	50%	78	\$967.00	\$37,713.00	\$452,556.00		
All ages	RSDI	50%	212	\$500.00	\$53,000.00	\$636,000.00		
					Monthly	\$90,713.00	\$1,088,556.00	(\$1,088,556)

Model 3: Conserve 100% of SSA benefits for youth age 14-21							Annual Benefit Amount Conserved	Budget Impact
Benefit Type	% Conserved	Number of Children	Avg Monthly Benefit	Monthly Benefit				
Children Aged 14 - 21 years (100%)	SSI	100%	47	\$967.00	\$45,449.00	\$545,388.00		
Children Aged 14 - 21 years (100%)	RSDI	100%	137	\$500.00	\$68,500.00	\$822,000.00		
						\$1,367,388	(\$1,367,388)	

Model 4: Conserve 100% of RSDI; Conserve 50% of SSI for youth 0-13; Conserve 100% SSI for youth 14-21							Annual Benefit	Budget Impact
Benefit Type	% Conserved	Number of Children	Avg Monthly Benefit	Monthly Benefit				
All Ages	RSDI	100%	212	\$500.00	\$106,000.00	\$1,272,000.00		
Children Age 0 - 13 years	SSI	50%	23	\$967.00	\$11,120.50	\$133,446.00		
Children Age 14 - 21 years	SSI	100%	47	\$967.00	\$45,449.00	\$545,388		
						\$1,950,834	(\$1,950,834)	