

FAQ – Master Trust

Formal Reference	Abbreviations or acronyms
Representative Payee	Rep Payee
Master Trust	MT
CF 285D Notice of Fee Assessment and Rights of Foster Child Regarding Government Benefits Form	285D
CF 285E Application for Review of Assessed Fee and Committee Findings Form	Fee Waiver
CF-FSP 5463 Master Trust Withdrawal Requests and Authorization Form	Withdrawal Request
CF-FSP-5312 Master Trust Expenditure Plan	Expenditure Plan

General Topics:

QUESTION 1: When is a MT account created?

ANSWER: A MT account is created when a child in the Department’s custody, is placed in licensed foster care (excluding Level I licensed care), and receives any benefit payment, income, or asset. The lead agency must apply to become the rep payee and if approved, they must establish a MT account, and notice must be filed with the court accepting the position of trustee. A MT account is **established** when the Social Security Award Letter and benefit payment is received by the lead agency.

Reference: 402.33(1)(e) F.S.; CFOP 170-16 Chapter 3, Section 3-4.

QUESTION 2: Is cost of care applied to a lump sum payment?

ANSWER: If the lump sum payment is deposited in a dedicated account, cost of care **is not** applied. However, there are times when SSA directs the lump sum payment be deposited in a current needs account, when this occurs, allowance is set aside, and cost of care is applied for each of the months the benefit was intended.

Reference: CFOP 170-16 Chapter 3, Sections 3-5b.(1) and 3-7c.(2); [SSA FAQ](#)

Withdrawal Requests:

QUESTION 3: Is approval of the withdrawal request required prior to making purchases from the MT?

ANSWER: Yes. Withdrawal requests be approved **prior** to making purchases following the lead agency’s approval process. If the request includes a single item expenditure equal to at least \$500 or the total purchase amount equals at least \$1000, additional approval is required by the Department.

Reference: 65C-17.003(2)(a) F.A.C.

QUESTION 4: When a single item purchase is above \$500 or the total purchase is equal to or greater than \$1000, who is the Department’s Region Designee responsible for approving?

ANSWER: The Circuit Community Development Administrator (CCDA).

QUESTION 5: Is a withdrawal request form needed when returning funds to SSA after a client has aged out or leaves licensed care?

ANSWER: No. The withdrawal request is intended to be used for purchases for the client from the MT account.

QUESTION 6: When a client leaves licensed care or turns 18, can the conserved funds remaining in their Master Trust or ABLE United account be given directly to the new caregiver or client?

ANSWER: The most acceptable method for conserved funds in a MT is to return funds to SSA; however, the lead agency may request approval from SSA to transfer the funds directly to the new rep payee or the client if they have reached the age of 18.

With an ABLE account, SSA must also approve the direct transfer of funds to the new payee or beneficiary. SSA recommends this be done by changing the signature authority for the account. If SSA does not approve the direct transfer or the new payee or beneficiary does not intend to hold the funds in the ABLE account, the funds must be removed from the account. See additional guidance in the SSA link provided below.

Reference: *CFOP 170-16 Chapter 3, Section 3-9 e – g, and 3-11*; [SSA Returning Conserved Funds](#)

QUESTION 7: At what age is the client signature required on a withdrawal request?

ANSWER: There is not a set age for this requirement. There are several reasons, other than age or disability, that a client may not be able to provide a signature. Some clients can understand and sign acknowledging their understanding, while others may not have the cognitive or physical ability to do so. In other instances, the client may not be available to sign due to location, however, an electronic signature could be acquired. The client should be aware and involved in decisions for withdrawals and purchases being made from their trust accounts whenever possible.

Fee Waiver and Change in Allowance:

QUESTION 8: Who are the Department's regional and Department designees that receive and review requests for requests for fee waivers or changes in allowance?

ANSWER: The Department's regional designee responsible for will receiving and reviewing requests submitted through the lead agencies, is the Circuit Community Development Administrator (CCDA). The CCDA will act as the committee chair and is responsible for submitting the recommendations of the committee to the Department designee for approval or denial. The Department Community Director is the designee for this step.

QUESTION 9: Can a fee waiver be approved with a retroactive date?

ANSWER: Yes, in limited circumstances. The 285D filing date is used as a reference for a retroactive effective date. This is the first notice to the client and interested parties of their right to request a fee waiver. If a request is received within 90 days of the initial filing, the effective date can be made retroactive to the month the 285D was filed. For other requests, the effective date can be the date the completed request was received.

In the event the initial 285D was not filed with the court within 30 days of the MT account being established, it should be filed immediately. This does not prevent a fee waiver request from being made, however, since the initial 285D was not filed as required, there could not be a retroactive date back to the period following the account being established.

Reference: *65C-17.004(1) F.A.C.*

QUESTION 10: Can a fee waiver be approved for longer than 6 months?

ANSWER: No. When the fee waiver is about to expire, the lead agency may reapply for the fee waiver if the need still exists and could receive approval for an additional 6 additional months.

QUESTION 11: Can a fee waiver be denied by the Lead Agency or Committee?

ANSWER: No. When a request for fee waiver is received with all supporting documentation, it must be forwarded by the lead agency to the Department Regional designee and reviewed by the committee. The Department designee will review the recommendations of the committee and approve or deny the request.

Miscellaneous Topics:

QUESTION 12: What actions are needed when a client receives funds for restitution, settlements, or inheritance?

ANSWER: The Lead Agency must consult with their Children’s Legal Services to determine the appropriate action to be taken there may be legal stipulations attached to the funds being received. If it is determined that the best option is to establish a Master Trust, the subaccount type would be long term and would be irrevocable. Cost of care would not be deducted.

Reference: 402.17(2)(a) F.S; CFOP 170-16 Chapter 3, Section 3-4.b.

QUESTION 13: Is a court order required for the lead agency to remain as the Representative Payee for a client that has turned 18 and is enrolled in EFC?

ANSWER: No. Prior to a client turning 18, they must complete the Adult Application for social security. At that point, they would opt to have the lead agency as a Representative Payee and SSA would approve or deny the request.

QUESTION 14: When completing the SSA Request to Be Selected as Payee form (SSA-11 BK), how should question 5 be answered?

ANSWER: Check the box for “NO” and leave blank. Details for the lead agency applying to be the rep payee will be entered in questions 9(a) and 11 of the form.

QUESTION 15: What is the process of gaining fiduciary responsibility for a client with Veterans Affairs (VA) benefits?

ANSWER: There are two numbers needed for this process:

National Contact Center (NCC): 800-827-1000

Fiduciary Assistance Line (FID): 888-407-0144 (for Florida, Georgia, and North Carolina)

To start the process, you would first contact the NCC and verify the child is on the Veterans award. You will also need to ask if an apportionment has been established for the child. This is often done when the parents are divorced, and a portion of the veteran’s benefits are being sent to the child.

VA Form 21-592 Request for Appointment of a Fiduciary, Custodian or Guardian would be submitted to FID if an apportionment has been established along with the court documents showing the child is in our care and custody. (Trying to locate one to share)

VA Form 21-0788 Information Regarding Apportionment of Beneficiary’s Award would be used in cases where an apportionment has not been submitted. (Attached)

Once the appropriate form is submitted, a field examiner is assigned, and a decision will be made to establish the Department/Lead Agency as the fiduciary. The FID will be your primary contact after you have contacted NCC with the initial questions outlined above.