

FINANCIAL EXPLOITATION INVESTIGATION SUITE OF TOOLS

FEIST Version 2.0 Instruction Manual

Developed by:



Karen Webber, CPA, CFE
200 Canal View Blvd., Suite 102
Rochester, New York 14623

For:



Bureau of Adult Services
Capital Office Park
52 Washington Street
Rensselaer, New York 12144

With funding from:



United States Department and Health & Human Services
330 C St SW
Washington, DC 20201

TABLE OF CONTENTS

Introduction.....	3
Phase I: Initial Inquiry & Observation.....	4
Step 1: Client Questions/Caseworker Observations	4
Step 2: Red Flags Checklist – Initial Inquiry & Observation	4
Phase II: Additional Investigation & Documentation.....	5
Step 3: Client Income & Expenses	5
Step 4: Bank Statement Summary	5
Step 5: Red Flags Checklist – Investigation & Documentation.....	6
Making the Best Referral	6
Appendix A: Client Data Form.....	8
Appendix B: Client Account Log	8
Appendix C: Document Review Guide	8
Appendix D: Forensic Accountant Referral Checklist	9

Introduction

The Financial Exploitation Investigation Suite of Tools (“FEIST”) was developed by Webber CPA, PLLC in conjunction with a federal grant to Enhance Adult Protective Services awarded by the Administration for Community Living (ACL) to the New York State Office of Children & Family Services Bureau of Adult Services (OCFS BAS). The purpose of these tools is to guide APS workers’ investigations of financial exploitation, a fast-growing and complex form of abuse against vulnerable adults of all ages. This manual was developed as part of OCFS BAS training on the use of the FEIST Version 2.0 and is meant to serve as a reference guide for users.

For purposes of FEIST, a financial exploitation investigation is divided into two phases. Phase I, Initial Inquiry & Observation, is composed of two steps intended to guide the user to a decision point - can financial exploitation be ruled out or not? If exploitation cannot be ruled out, the caseworker moves to Phase II, Additional Investigation and Documentation, which is composed of three steps intended to guide the user through a thorough and well-documented investigation of suspected financial exploitation. The FEIST steps, when assembled together with supporting documentation, comprise a complete package to assist with making a successful referral to a third party. It is important to note that these steps are not meant to be rigidly applied. They are simply a helpful structure for conducting investigations.

When investigating alleged financial exploitation, it is important to maintain objectivity, understand the facts of the situation, identify key players, and look for characteristics or “red flags” that will assist the case worker or supervisor with distinguishing between financial exploitation and inability to manage finances. Various remedies exist for clients who have been financially exploited or who have fallen victim to poor money management, so this distinction is necessary in order to efficiently and effectively assign APS resources.

Contact with law enforcement must be made when financial exploitation is suspected. Some evidence of larceny or other crime will be readily apparent to APS, such as forged signatures or large cash withdrawals initiated by a suspect, and this evidence will be enough for police to file a report and initiate a criminal investigation. However, law enforcement may decline to further investigate an alleged financial exploitation case where there is insufficient evidence of a crime. In these cases, the APS worker or supervisor may elect to employ additional resources for intervention, including, but not limited to legal assistance, guardianship petitions, representative/protective payees, civil attorneys, Enhanced Multi-Disciplinary Teams (E-MDTs), and forensic accountants.

Remedies available to clients who have been financially exploited are covered in more detail in prior guidance issued by NYS OCFS Bureau of Adult Services, including:

-) “Broken Trust: Financial Exploitation and Power of Attorney Abuse, A Guide for PSA Professionals in New York State” (NYS Office of Children and Family Services; Brookdale Center for Healthy Aging)
-) “Investigating Financial Exploitation: PSA Caseworker Participant Handbook” (NYS Office of Children and Family Services; Brookdale Center for Healthy Aging)

Other prior tools and templates developed and shared by OCFS BAS are referenced throughout the FEIST training and should be used in conjunction with the FEIST documents included in this manual.

Questions on the FEIST documents may be directed to Webber CPA, PLLC via Karen Webber, CPA, CFE, at kwebber@webbercpa.com, or to OCFS BAS via Lisl Maloney at lisl.maloney@ocfs.ny.gov.

Phase I: Initial Inquiry & Observation

Step 1: Client Questions/Caseworker Observations

The first tool in the Financial Exploitation Investigation Suite of Tools (FEIST) is *Step 1: Client Questions/Caseworker Observations*. The key to any good investigation is asking the right questions, and the key to making a good referral is presenting the results of that investigation in a concise, organized format. *Step 1: Client Questions/Caseworker Observations* provides a structure for asking probing questions and documenting the client's responses. For each question, indicate yes, no, or unknown/not applicable, and describe any additional details noted. Space is provided for workers to document any observations made during their visits that could be indicators of abuse.

Step 1: Client Questions/Caseworker Observations also assists the worker with recognizing when further investigation may not be necessary. Questions 1 through 28 are intended to identify whether financial exploitation may be occurring; if so, Questions 29 through 50 are intended to help the worker dig deeper and recognize the full scope of the abuse.

Workers should complete *Step 1: Client Questions/Caseworker Observations* as fully as possible with the understanding that it is simply a tool, not a required procedure for case investigations. These questions are not intended to replace standard interview procedures for APS workers, but to supplement those procedures. Rapport must be built with the client before broaching these questions, and it may take repeated visits to build this rapport. Even then, the client may be unwilling or unable to answer certain questions. *Step 1: Client Questions/Caseworker Observations* can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

Step 2: Red Flags Checklist – Initial Inquiry & Observation

The second tool in the Financial Exploitation Investigation Suite of Tools (FEIST) is *Step 2: Red Flags Checklist – Initial Inquiry & Observation*, which serves as a summary of all “Red Flags” of abuse noted during the worker's assessment of the client. Space exists within the tool for the worker to reference the indicator or specific example of financial exploitation so that, when submitted as part of the complete referral package, the third party may efficiently assess the case, review the relevant evidence, and begin intervention.

Step 2: Red Flags Checklist – Initial Inquiry & Observation also contains a decision point, which requires the worker to assess whether, based on findings so far, there is reason to believe financial exploitation may be occurring. If the worker answers “yes” to any of the questions asked, the worker should continue to FEIST Phase II, and take the additional action noted within *Step 2: Red Flags Checklist – Initial Inquiry & Observation*. If not, the worker may cease use of the FEIST because financial exploitation has been ruled out.

Step 2: Red Flags Checklist – Initial Inquiry & Observation can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

Phase II: Additional Investigation & Documentation

Step 3: Client Income & Expenses

Step 3: Client Income & Expenses creates a detailed summary of the client’s income and expenses. For each income source, indicate the approximate amount of each payment, and the frequency of payment (monthly, quarterly, annually, etc.). For each regular expense item, list the payee, amount, and frequency of payment. Sections for “other” income and expenses are provided to accommodate items not already listed. Based on what is known about the client’s income and expenses, the worker can use *Step 3: Client Income & Expenses* to determine whether the client’s income does not cover the bills, which may be an indicator of either mismanagement of funds or financial exploitation.

Step 3: Client Income & Expenses can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

At this time, the worker may want to complete *Appendix B: Client Account Log* to assist them with preparing a list of all the client’s accounts they are aware of and tracking whether statements and supporting records for those accounts have been requested and obtained from financial institutions. Once FEIST Steps 1 through 3 are complete, the worker should have an understanding of the alleged exploitation, the client’s normal income and expense patterns, and the accounts that may be affected. With this information, workers should be able to identify transactions that do or do not fit these expectations as they start reviewing records in FEIST Steps 4 and 5.

Step 4: Bank Statement Summary

Step 4: Bank Statement Summary assists workers in performing an initial analysis of deposit and withdrawal trends in the client’s bank accounts (checking, savings, money market accounts, certificates of deposit). Beginning balances, ending balances, deposits, and withdrawals are usually summarized on the first page of each bank statement, and should be entered in the appropriate fields in *Step 4: Bank Statement Summary*. If observed deposit or withdrawal patterns deviate from what the worker knows about the client’s normal income and spending patterns, a more detailed review of bank statements is necessary to determine the cause of these changes.

Step 4: Bank Statement Summary can be completed electronically in Microsoft Excel® or by hand when using a printed copy. If completed electronically, ending balances, totals, and net activity fields will automatically calculate. One *Step 4: Bank Statement Summary* should be completed for each account and year reviewed.

Step 5: Red Flags Checklist – Statement Review

Step 5: Red Flags Checklist – Statement Review serves as a summary of all “Red Flags” of financial exploitation noted during the worker’s review of the statements and records received from financial institution(s), and acts as a guide for workers to use as they review financial records in detail. Space exists within the tool for the worker to reference specific examples of financial exploitation noted during their review so that, when submitted as part of the complete referral package, the third party may efficiently assess the case, review the relevant evidence, and begin intervention.

Step 5: Red Flags Checklist – Statement Review may be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

Making the Best Referral

Employing additional resources for intervention in financial exploitation cases may require APS workers to make a referral, such as for legal assistance, guardianship, representative/protective payees, private attorneys, law enforcement, E-MDTs, or forensic accountants. The best referrals are supported by records that clearly describe the client’s situation and provide specific examples of abuse. The FEIST provides a detailed framework for gathering records, conducting a thorough investigation, and ultimately, if necessary, presenting these records in an organized manner to a third party for assistance with investigation and intervention.

Referral packages should be assembled as follows:

-) Completed form for *Step 1: Client Questions/Caseworker Observations*
-) Completed form for *Step 2: Red Flags Checklist – Initial Inquiry & Observation*
-) Completed form for *Step 3: Client Income & Expenses*
-) Completed form for *Step 4: Bank Statement Summary*
-) Completed form for *Step 5: Red Flags Checklist – Statement Review*
-) Completed form for *Appendix A: Client Data Form* (if applicable)
-) Completed form for *Appendix B: Client Account Log* (if applicable)
-) Completed form for *Appendix C: Document Review Guide* (if applicable)
-) Completed form for *Appendix D: Forensic Accountant Referral Checklist* (if applicable)
-) All statements and supporting records obtained from financial institutions
-) List of other parties involved with case and contact information
-) Any other relevant documents obtained during the investigation

When making a case referral to any third party, be sure to communicate any deadline(s) associated with your proposed intervention.

To refer a case to the forensic accountant, or to determine whether a case may be appropriate for a forensic accountant, workers may complete *Appendix D: Forensic Accountant Referral Checklist*.

FINANCIAL EXPLOITATION INVESTIGATION SUITE OF TOOLS

FEIST Version 2.0 Supplemental Appendices

Appendix A: Client Data Form

Appendix B: Client Account Log

Appendix C: Document Review Guide

Appendix D: Forensic Accountant Referral Checklist

Appendix A: Client Data Form

Client data is always collected and stored by NYS APS workers, such as in ASAP.net or APS.net, but access to these programs is generally not available to other parties involved in a case investigation, like law enforcement or forensic accountants. *Appendix A: Client Data Form* summarizes client information to facilitate the clear, concise communication of important data to other parties involved in an investigation. Not only should the form contain demographic information, it should also contain a summary of the alleged exploitation as communicated by the referral source or observed by APS in the space provided. Workers should complete the form as fully as possible.

Appendix A: Client Data Form can be completed electronically using Microsoft Word®, or by hand using a printed copy. The electronic copy contains drop-down menus for convenience, indicated by the words, “Choose an item.” If completed electronically, fields will expand and pages may be added as data is entered.

Appendix B: Client Account Log

Appendix B: Client Account Log assists workers with creating a list of accounts held by the client, and tracking the related documents requested and received. Information captured in *Appendix B: Client Account Log* includes financial institution name, account type and number, ownership information (individual, joint, POA listed, etc.), dates when the accounts were opened and closed, time period for which statements or related documents were requested, and dates those documents were received. If statements and related documents are forwarded to a third party, either alone or as part of a complete referral package, *Appendix B: Client Account Log* acts as a “Table of Contents” for the documents so that they are presented to the third party in an organized format.

Appendix B: Client Account Log can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

Appendix C: Document Review Guide

Appendix C: Document Review Guide provides a list of other types of documents that workers may want to request as part of their investigations. To assist workers in reviewing these records, *Appendix C: Document Review Guide* provides some “Considerations for Review”, which are questions designed to point workers to specific pieces of information within certain documents that may be relevant to their investigation. Any findings noted while reviewing these documents should be described in the “Notes” section of *Appendix C: Document Review Guide*. It is important to note that workers do not have to request all of these documents to conduct an investigation. Action items from *Step 1: Client Questions/Caseworker Observations* and “Considerations for Review” from *Appendix C: Document Review Guide* help workers narrow down specific documents that may be relevant to a case.

Appendix C: Document Review Guide can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

Developed by Webber CPA, PLLC in conjunction with a federal grant to Enhance Adult Protective Services awarded by the Administration for Community Living to the New York State Office of Children & Family Services.

Appendix D: Forensic Accountant Referral Checklist

Appendix D: Forensic Accountant Referral Checklist assists workers with determining whether a case may be appropriate to refer to a forensic accountant. *Appendix D: Forensic Accountant Referral Checklist* also contains a list of documents to send to the forensic accountant, which includes any and all FEIST steps completed by the worker as part of their investigation.

Case characteristics that may merit the use of forensic accountants include:

-) **Urgency:** Current caseloads are too high to perform a thorough and timely review of records
-) **Complex account structure:** The Client has multiple bank and/or investment accounts, multiple institutions, and frequent funds transfers
-) **Duration:** The period of abuse is unknown or suspected to have occurred over many years
-) **Comingling of funds:** Client and caretaker/suspected perpetrator share resources
-) **Unknown spending habits:** Client spending patterns are unknown and not easily observable based on initial review of records
-) **Multiple perpetrators are suspected:** Missing funds must be appropriately attributed to respective perpetrators in order to move forward
-) **Guardianship is desired:** Petition may be enhanced by forensic accounting report
-) **Law enforcement involvement is desired:** Police require more evidence of exploitation to investigate a case
-) **Client acknowledgment:** Forensic accounting report may assist Client or family with understanding the nature and extent of abuse

Appendix D: Forensic Accountant Referral Checklist can be completed electronically using Microsoft Word®, or by hand using a printed copy. If completed electronically, fields will expand and pages may be added as data is entered.

FINANCIAL EXPLOITATION INVESTIGATION SUITE OF TOOLS

FEIST Version 2.0

Financial Exploitation Investigation Suite of Tools (FEIST)
Phase I: Initial Inquiry & Observations
Step 1: Client Questions/Caseworker Observations

County _____ Caseworker _____
Case No. _____ Email Address _____

	Client Questions/ Caseworker Observations	Response (Y/N/Unknown or N/A)	Notes (Optional)
1.	If there are allegations of FE in referral, open with questions relating to the issues in the description of problems.		
2.	Are you experiencing problems or concerns related to care or finances?		
3.	Does your income cover your regular expenses, including your monthly bills, and are you able to manage your own finances?		
4.	Has your heat or electricity ever been shut off? When? Have you ever been evicted or threatened with eviction? Is your rent or mortgage up to date?		
5.	Does anyone else live with you?		
6.	Does that person contribute to household expenses?		
7.	Does that person depend on you financially? Do you want to support that person financially?		
8.	Are you satisfied with the care you have been receiving or has anyone prevented you from getting the necessary food, clothes, medical supplies or care, or receiving your mail?		
9.	Do you have regular income? How much and from what sources? Government benefits (such as social security or disability income), pension, investment securities, other?		
10.	Does anyone help you with your finances/to pay your bills? Do you have a POA, representative payee, or other fiduciary? Does that person charge a fee for those services?		

11.	Does that person manage their own money well? Does that person have problems with debt, gambling, drugs, alcohol, or other costly habits?		
12.	Have you recently changed your POA, representative payee, or other fiduciary? Did anyone ask you/pressure you to make that change?		
13.	Are you comfortable with how your finances are being handled?		
14.	Do you have a checking and/or savings account? Where? Do you share that account with anyone?		
15.	Does your bank account balance increase monthly? Have you received notice of insufficient funds?		
16.	Does anyone have your bank card or checkbook? Do they have the PIN #?		
17.	Do you use credit cards? How many? With ewhich companies? Do you have a balance on them?		
18.	Have you ever noted any unauthorized charges?		
19.	Has anyone asked you to sign or co-sign papers or give or lend them money?		
20.	Have you recently applied for a loan? Have you ever been denied an application for credit or loan?		
21.	Have you received a call or letter from a debt collection agency?		
22.	Has your identity ever been stolen?		
23.	Have you ever been the victim of a scam?		
24.	Do you have any other important assets like jewelry, land, other property?		
25.	Are you missing any money, valuables, or property?		
26.	Are you concerned you are being taken advantage of financially? How?		
27.	CW Observation: Did you observe: collection invoices, disconnected utilities, eviction or foreclosure notices, unopened mail, lack of food, lack of or failure to comply with prescribed medication, missing valuables, missing financial records, missing funds?		

28.	CW Observation: Did you observe: concern or confusion about finances or housing, no memory of recent financial or legal transactions, concerns about threats related to financial or legal transactions, large monetary gifts, fear of, deference to or reliance on caregiver for response, or a new caregiver or trusted relationship?		
If there are no indicators of financial exploitation (FE), STOP. Proceed to Questions in Step 2. If there are indicators of FE, continue with questions 29 - 50.			
29.	Have you had to go to the hospital recently? When/what dates?		
30.	Do you have health insurance? What kind?		
31.	What are your regular expenses?		
32.	Have you made any large, monetary gifts recently?		
33.	Do you own your home? Is anyone else listed on the deed?		
34.	Do you have a reverse mortgage on your home? Have you ever applied for one?		
35.	Do you own/lease/use a car?		
36.	Does anyone else use the car? Does that person pay for gas or repairs with their own money or yours?		
37.	Do you have any insurance policies? Who are the beneficiaries?		
38.	Do you have a Will in place? Who are the beneficiaries?		
39.	Have you made changes to your Will and/or beneficiaries recently? Did anyone ask you/pressure you to do this?		
40.	Do you have an investment account (stocks, bonds, etc.)? Where?		
41.	Do you have any other accounts at banks or brokerage firms other than those you just told me? What kind(s) of account(s), and at which financial institution(s)?		
42.	Do you receive dividends or investment income?		
43.	Are you the beneficiary or principal of a trust?		
44.	Have you recently sold or inherited property?		
45.	Do you file a tax return every year?		

46.	Do you have any debt?		
47.	Have you had to file for bankruptcy?		
48.	CW Observation: Did you observe: isolation from family/loved ones, poor eye contact, withdrawn nature, malnourishment, hygiene issues, cuts, bruises, inappropriate clothing, or medication compliance issues? Any legal invoices, or recently signed legal documents (POA, HCP, Will, etc.)?		
49.	CW Observation: Do/does the individual(s) identified by the client under Step 1 have any apparent issues with or known history of drugs, alcohol, gambling, theft/exploitation, or domestic violence?		
50.	CW Observation: Do/does the individual(s) identified by the client as caregiver or other responsible party appear capable of providing the necessary assistance to the client?		

Other Comments/Observations:

Financial Exploitation Investigation Suite of Tools (FEIST)
Phase I: Initial Inquiry & Observation
Step 2: Red Flags Checklist – Initial Inquiry & Observation

County _____ Caseworker _____
Case No. _____ Email Address _____

✓ Red Flag	Reference to Indicators
Multiple referral sources indicate financial exploitation	
Responses suggest lack of capacity, dementia, or severe disorientation	
Client relies on others for ADLs/IADLs	
Others speak for the client, or client defers to others for response	
Client is evasive, hostile, or dismissive about finances	
Client is isolated from resources/other contact	
Client reports feeling threatened or ashamed	
Client is unable to pay bills	
Client is uncomfortable with the way finances are handled	
Individual handling finances or care charges excessive fees	
Client is uncomfortable with decisions made by POA or HCP	
Others live in the home and do not contribute to household	
Others use client's car/other asset	
Client believes income does not cover regular expenses	
Income should but does not cover regular expenses	
Client has unexplained debt	
Client has unexplained balances on credit cards	
Client believes they have been financially exploited, scammed, or had their identity stolen	

After you have reviewed this Step 2: Red Flags Checklist, ask yourself the following additional questions based on what you know so far:

- Is there a reason to believe the client may be a victim of financial exploitation by the hands of another person? Is this something you cannot rule out?
- Is there a reason to believe someone may be taking the client’s funds or property without the client’s permission or knowledge?
- Is there a reason to believe that someone is using the client’s funds or property in their own interest rather than the interest of the client?
- Does the client indicate he/she is being exploited, and this cannot be ruled out?

If the answer to any of these questions is yes, **proceed with FEIST Phase II and take other needed action to gather additional information.**

- This includes making a prompt request for customer financial records from the financial institutions where the client is believed to have accounts. Use the standard request form approved by your local district.
- Where the client is believed to have given a power of attorney to an agent, send a 15-Day Letter to the agent, directing the agent to provide the power of attorney document and all written transactions made by the agent on behalf of the client. If the agent fails to timely respond, contact your counsel and ask for initiation of a special proceeding for a court to compel the agent’s disclosure of such records.
- Consider requesting a credit report for the client (if capable of giving consent).

If, on the other hand, it appears that the client is knowingly giving their funds or property away to another person, with the client's consent AND without coercion or intimidation, then it is unlikely to be financial exploitation. **If you can rule out financial exploitation, stop use of the FEIST.**

Financial Exploitation Investigation Suite of Tools (FEIST)
Phase II: Additional Investigation & Documentation
Step 3: Client Income & Expenses

County _____ Caseworker _____
Case No. _____ Email Address _____

Income Source	Amount	Frequency	Notes
Social Security			
Disability benefits			
Other government benefits			
Pension(s)			
Investment income/distributions			
Trust income/distributions			
Wages			
Rental income			
Inheritance			
Insurance proceeds			
Other:			

Expense	Amount	Frequency	Notes
Mortgage			
Rent			
Facility rent (skilled nursing, assisted living, etc.)			
Home Equity Line of Credit			
Utilities (gas, heat, phone, water)			
Cable			
Car loan			
Gas			
Food			
Real estate taxes			
Insurance			
Cell phone			
Medical			
Loan payment(s)			
Credit card payment(s)			
Magazine/newspaper subscription(s)			
Charitable donations			
Cash withdrawals			
Clothing			
Pooled trust/Medicaid spenddown			
Other:			

Does income appear to cover regular expenses? (Circle one)			Yes	No
Other Comments:				

**Financial Exploitation Investigation Suite of Tools (FEIST)
Phase II: Additional Investigation & Documentation
Step 4: Bank Statement Summary**

County _____
Case No. _____

Caseworker _____
Email Address _____

Financial Institution: _____
Account Number: _____
Account Type: _____
Year: _____
Beginning Balance: _____

INSTRUCTIONS: Based on the information given on the bank statements, complete the chart below to analyze summarized financial activity over time. See FEIST manual for more information. Those with access to a forensic accountant may wish to skip this step and instead forward all financial records to the forensic accountant for more detailed

Statement Month	Income Deposits	Other Deposits	Check Withdrawals	ATM Withdrawals	Transfers to Other Accounts	Fees	Other Withdrawals	Ending Balance
January								-
February								-
March								-
April								-
May								-
June								-
July								-
August								-
September								-
October								-
November								-
December								-
Totals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
								Net Activity

Financial Exploitation Investigation Suite of Tools (FEIST)
Phase II: Additional Investigation & Documentation
Step 5: Red Flags Checklist - Statement Review

County _____ Caseworker _____
Case No. _____ Email Address _____

✓ Red Flag	Reference to Specific Examples
Client denies transactions	
Negative net activity (cash flow) in one or more accounts	
Increasing monthly/annual withdrawals over time	
Increasing monthly/annual deposits over time	
Decreasing monthly/annual deposits over time	
Large, unknown withdrawals	
Large, unknown deposits	
Accounts being consolidated	
Utilities being paid while client resides in facility	
Multiple payments to utility company in the same month	
Payments for gas/auto when client does not have/use car	
Round dollar amounts paid to credit card companies	
Transfers to/from other accounts	
Frequent account changes (ex: new account numbers or new banks)	
Account ownership changes during period (ex: POA added)	
Statement mailing address changes during period	
Suspect was receiving/keeping bank statements	
Withdrawals from previously unused accounts	
Debit card purchases inconsistent with observed lifestyle	
Increase in ATM withdrawals	
ATM/debit card held by suspect	
Checks written to cash or to suspect(s)	
Inconsistent or suspicious handwriting or signatures on checks or withdrawal slips	
Insufficient funds fees, returned checks, or rejected transactions	
Deposits from real estate transactions, or lack thereof	
Growing credit card debt, or new credit accounts opened	
Decline or change in credit score	
New loans	
Recent large purchases (cars, furniture)	
Transactions incurred while client was in hospital or other facility	
Spending in client's account consistent with spending in suspect's account	
Change in banking activity observed when suspect became involved	

Other Comments:

FINANCIAL EXPLOITATION INVESTIGATION SUITE OF TOOLS

Supplemental Appendices

Financial Exploitation Investigation Suite of Tools (FEIST)
Appendix A: Client Data Form

County	_____	Referral Date	Click or tap to enter a date. _____
Case Worker	_____	Case No.	_____
Email Address	_____	Referral Source	_____
Client Name	_____	DOB	_____
Address Line 1	_____	Primary Language	_____
Address Line 2	_____	Gender	Choose an item. _____
City, State, ZIP	_____	Marital Status	_____
Telephone	_____	Race/Ethnicity	_____
Others in Home	_____	Employment Status	_____
POA/Relationship	_____	Veteran	_____
HCP/Relationship	_____	Education	_____
Other	_____		
Representative/ Relationship	_____	Suspect Name(s)/ Relationship(s)	_____

Case Summary: *(description of alleged exploitation as communicated by referral source/observed by APS)*

**Financial Exploitation Investigation Suite of Tools (FEIST)
Appendix B: Client Account Log**

County _____ Caseworker _____
Case No. _____ Email Address _____

	Financial Institution Name	Account Number	Ownership/Type	Open Date	Close Date	Time Period Requested	Date Received
<i>Checking Accounts</i>							
1							
2							
3							
<i>Savings Accounts/Money Market Accounts</i>							
1							
2							
3							
<i>Certificates of Deposit</i>							
1							
2							
3							
<i>Investment Accounts</i>							
1							
2							
3							
<i>Real Property and Other Assets</i>							
1							
2							
3							
<i>Loans, Credit, and Other Debt</i>							
1							
2							
3							

Financial Exploitation Investigation Suite of Tools (FEIST)
Appendix C: Document Review Guide

County _____ Caseworker _____
Case No. _____ Email Address _____

Document	Considerations for Review	Notes
Power of Attorney documents	When was it executed? Did the Client have capacity at that time? Who is authorized as agent for the Client? What are his/her powers? Are they exercised appropriately, if at all? Is agent receiving compensation? Is there a gift rider? Does the bank have a copy of a valid POA to allow the person to act on the account? Should an accounting be requested from the agent under POA (15-day letter)?	
Health Care Proxy documents	What are the Client's wishes for medical care? Who is authorized to make decisions on Client's behalf? Have past decisions aligned with Client directives?	
Wills	Are beneficiaries appropriately designated? Who is the Executor? When was it signed?	
Deeds	Do County Clerk records reflect property ownership as described by Victim? Any recent transfers?	
Mortgage applications, agreements, repayment records	Does the Client have a mortgage? On what property? When was it signed? Who signed it? When is it expected to be paid off?	
Reverse mortgage applications, agreements, and draw requests	Does the Client have a reverse mortgage? On what property? When was it signed? By whom? How much has been withdrawn?	
Line of credit applications, agreements, disbursement and repayment records	Does the Client have a home equity line of credit? When was it signed? Who signed for it? When is it expected to be paid off?	
HUD statements and real estate closing documents	Where is the property? How much money did the Client spend or receive for the purchase or sale of real property? Are these figures reflected in bank documents?	

Document	Considerations for Review	Notes
Lease agreements	Does the Client lease any property or vehicles? What type of property or vehicle? Was the lease entered into for the direct benefit of the Client? How long is the Client obligated under the lease? What are the payment terms?	
Vehicle title	Does the Client own the vehicle? What kind? Are liens attached? Has it been transferred to another party? Did the other party give appropriate consideration?	
Property appraisals (real estate, auto, jewelry)	What additional property does the Client own? Are these assets accounted for?	
Collateral agreements	Has the Client assigned any property as collateral for debt? What property? What is the assigned value? What are the payment terms?	
Insurance policy documents	Who purchased the insurance, when, and for what purposes? Are beneficiaries appropriately designated? Were beneficiaries recently changed? What is the cash value, if any? Are any loans outstanding? What is the premium and how often is it paid?	
Bank statements and records for all accounts and safe deposit boxes, such as: signature cards and account opening records, canceled checks (front and back), deposit items, withdrawal slips, wire transfer details, Currency Transaction Reports (CTRs), and Suspicious Activity Reports (SARs)	Who is listed on the accounts? How long have accounts been open? What are expected patterns of spending? Do observed patterns deviate from expectations? Did you note inconsistent or suspicious handwriting/signatures? Large transactions? Transfers between accounts and/or account consolidations? Unauthorized charges?	

Document	Considerations for Review	Notes
Investment account documents, such as: statements, deposit forms, withdrawal requests, beneficiary designations	Who is listed on the accounts? How long have accounts been open? What are expected patterns of income and distributions? Did you note inconsistent or suspicious handwriting/signatures? Large withdrawals? Other linked bank/investment accounts?	
Credit card statements	Are bills being paid regularly, in full, and on time? How much debt is outstanding?	
Trust documents	Is the Client a trustee or beneficiary of a Trust? What is the approximate value of the Trust and related income? What are implications for the case?	
Federal and state income tax returns	Did the Client file a tax return, if required? From where does the Client draw income? Does the Client have investments? A mortgage? Has APS requested financial records from all institutions listed on Schedules B and D?	
Medicaid application and decision	Is the Client covered by Medicaid? When was the application submitted, signed, and approved? Will alleged exploitation affect eligibility?	
Medical/Insurance records	What kind of medical conditions does the Client have? What services were provided recently, and which services are covered by insurance? Did the Client have large medical bills in the past or upcoming?	
Hospital records	Was the Client recently hospitalized? What kind financial activity took place while the Client was hospitalized? Does that activity appear reasonable given the Client's situation?	
Resident facility records	Who is the primary contact for the Client? What information does the Client's account history and notes reveal?	

Document	Considerations for Review	Notes
Capacity/psychiatric evaluation	Has a provider determined Client's capacity? Was determination effective before or during abuse? Were/are suspected perpetrators aware of determination?	
Past APS records	What issues have arisen in the Client's past and what plans were put in place following any case closings?	
Guardianship records	Who makes decisions on behalf of the Client? Does the guardianship cover person, property, or both?	
Probate court records	What assets were left to the Client as a result of another's death? Are those assets in the Client's possession?	
Bankruptcy court records	What was the reason and outcome of the bankruptcy proceedings? What is the status of any debt repayment?	
Other judgment records	What was the reason for judgment? What debt is owed by the Client as a result? What is the status of repayment?	
Other Documents Reviewed/Notes:		

Financial Exploitation Investigation Suite of Tools (FEIST)
Appendix D: Forensic Accountant Referral Checklist

County _____ Caseworker _____
Case No. _____ Email Address _____

✓ **Case characteristics that may merit the use of a forensic accountant:**

- Urgency: Current caseloads are too high to perform a thorough and timely review of records
- Complex account structure: The Client has multiple bank and/or investment accounts, multiple institutions, and frequent funds transfers
- Duration: The period of abuse is unknown or suspected to have occurred over many years
- Comingling of funds: Client and caretaker/suspected perpetrator share resources
- Unknown spending habits: Client spending patterns are unknown and not easily observable based on initial review of records
- Multiple perpetrators are suspected: Missing funds must be appropriately attributed to respective perpetrators in order to move forward
- Guardianship is desired: Petition may be enhanced by forensic accounting report
- Law enforcement involvement is desired: Police require more evidence of exploitation to investigate a case
- Client acknowledgment: Forensic accounting report may assist Client or family with understanding the nature and extent of abuse

✓ **Case documents to send to a forensic accountant:**

- Step 1: Client Questions/Caseworker Observations
- Step 2: Red Flags Checklist – Initial Inquiry & Observation
- Step 3: Client Income & Expenses
- Step 4: Bank Statement Summary
- Step 5: Red Flags Checklist – Statement Review
- Appendix A: Client Data Form
- Appendix B: Client Account Log
- Appendix C: Document Review Guide
- Appendix D: Forensic Accountant Referral Checklist
- All statements and supporting records requested and obtained from financial institutions
- List of other parties involved with case and contact information.
- Any other relevant documents obtained during the investigation
- Deadline for report: _____

Other Comments: