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Procedures and Fees for Copies of Records

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February 2, 2004

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Procedures and Fees for Copies of Records

Introduction

The mission of the South Carolina Vocational Rehabilitation Department (SCVRD) is to enable eligible South Carolinians with disabilities to prepare for, achieve, and maintain competitive employment. To be eligible for SCVRD services, an applicant must have a physical or mental disability that interferes with their ability to work. The applicant must have a goal to work, would benefit from services that SCVRD provides, and those services would lead to permanent competitive employment. SCVRD is essentially an employment agency for its clients. Services are focused entirely on employment goals and outcomes. The Department serves over 135 different physically and mentally disabling conditions, but does not provide lifelong services.

When an individual applies for service, a case folder is opened which accumulates all the information gathered to determine eligibility. Once eligibility has been determined, client and counselor collaborate to develop an Individualized Plan for Employment (IPE) that will act as a guide for the provision of vocational rehabilitation services. The client's case folder becomes the repository for all client information and activities, such as, medical records, IPE, demographics, counselor narrative and case expenditure history. The Department is frequently contacted by attorneys representing clients on various legal matters, such as, workers compensation and personal injury to request copies of records. The request can come into any one of the Department's twenty-three field offices across the state or the State Office in West Columbia. The procedures and fees charged for copies of case records varies from office to office and this

inconsistency has resulted in confusion in what to charge, when to charge, and a lack of control in the collection process. This project will establish an appropriate fee schedule for the duplication of records and establish a uniform procedure for collection of these fees.

Review Information Sources

The only information related to this topic is in the Department's Case Service Policy (CSP) manual. There are two sections which make reference to the handing of confidential documents and the charging of fees for those documents.

Section 5.1.2.28 (Attachment 1) is a reference to SCVR Form 73, Invoice for preparing Duplicate Copies of Documents (Attachment 2). In reference to fees, this section states that "The Department may charge the receiving party for duplicating the documents." The use of the words "may charge" has resulted in some office interpreting that the charging of fees is at their discretion. The last sentence in the section: "For charge amounts, refer to the *Fee Schedule Manual*" is not an appropriate reference, because the Fee Schedule Manual is for expenditure fees that the Department will pay for various case services and does not address revenue fees. SCVR Form 73 does show a charge rate of 50 cents per copy. The fee for the duplication of documents is actually found in the other section of the CSP Manual.

Section 7.4.11 (attachment 3) Duplicating fees and access to records is the only place in the manual that shows a charge rate of 50 cents per copy, but this section is similar to section 5.1.2.28 in that it uses the ambiguous phrase "...but they may be copied

at a charge of 50 cents per page”. Again, the use of the word “may” has resulted in some offices interpreting that charging a fee for the duplication of records is optional.

Methodology

To determine the scope of activity in the fee collection process the Incoming Check Ledger was analyzed for the period starting July 1, 2002 and ending November 19, 2004. Data from this manual ledger was entered into a spread sheet to determine the number of payments received, dollar amounts received, and location of offices collecting the fees. Interviews were also conducted with several offices that submit fees to establish the typical process flow and with several offices that have not submitted any fees during the period analyzed. State laws and regulations that pertain to charging fees for the duplication of records will also be reviewed to determine an appropriate fee schedule for the Department.

Results

The data collected from the Incoming Check Register (Attachment 4) revealed that 80 checks were received for copying of records and funds received totaled \$1,394.38. Surprisingly, the 80 receipts came from only 13 of our 24 locations. All but one of the 13 locations charged 50 cents per page; the other charged only 25 cents per page. Two locations also charged a \$15 administrative fee and a fee for postage on top of the copy fee. Interviews were conducted with several offices that had receipts and several procedural problems were noted.

The first procedural problem noted is with the process flow for billing and collecting funds for copying records. The typical process (attachment 5) is for the office to make a copy of the requested records, prepare an invoice, and send these documents to the requesting entity. The Department does not have an automated accounts receivable system and by sending SCVR Form 73, which is not a pre-numbered invoice, very poor internal controls exist in the billing process. There is no means for determining if all invoices are being paid and all payments are recorded. Until an automated billing process is developed, process accountability will be improved by submitting an invoice without the requested records attached. Once payment is made, a cash receipt can be made and returned with the copy of the requested records. (Attachment 6).

The other concern noted is that not every request for records is being invoiced. Several locations report that if the requested records were only for a few pages it was not worth the effort to process an invoice. The requested records were either mailed or faxed without charge. An increase in fees would strengthen the importance of processing an invoice.

To determine what fees would be appropriate, South Carolina state law was searched for any references to "cost per page". The search uncovered three sections (42-15-95, 44-7-325 and 44-115-80) which reference what fees may be charged for the duplication of records. All three sections state that "... the fee may not exceed sixty-five cents per page for the first thirty pages and fifty cents per page for all other pages, and a clerical fee for searching and handling not to exceed fifteen dollars per request plus actual postage ..." A new SCVRD Form 73 (Attachment 7) has been developed that

incorporates an administrative handling fee of \$15 and provides for charging of postage.

The rate per page is left at 50 cents for simplicity.

Interviews conducted at the offices that had no receipts for record copying revealed either the office was unaware that we could invoice for this service or that unless the request was very large, they did not bother to invoice. Several of these offices indicated that they receive three to four requests per month but the Incoming Check Ledger does not reflect this much activity. The Two sections of the CSP manual have been updated to include the \$15 administrative handling charge and the charge for postage, if applicable. The use of the word “may” was changed to “shall” to reflect that the fees are not optional. All offices will be notified by the Case Services Department of the changes in the CSP manual and the change in procedures topic will be included in the next supervisors meeting.

Summary and Conclusions

This project studied the activities that take place in the process of requesting copies of records and the payment of fees for those records. The results of the project are the development of an appropriate fee schedule for the duplication of records and establishment of a uniform procedure for collection of these fees. Changes and updates put into place include the following:

- Update and correction to CSP Manual section 5.1.2.28
- Revision to CSP Manual section 7.4.11 to include new fees
- Revised SCVRD Form 73

- Revised process flow to improve internal controls over the invoicing and collection of fees

The Incoming Check Ledger will be reviewed annually for compliance with these changes and also to determine impact of the changes financially.

While the processing and charging of fees for copies of record can in no way be viewed as a key process for creating customer value and achieving business success and growth, it is important that support process have good internal controls and accountability. In these times of tight funding and shrinking budgets the public and elected representatives are demand efficiency and accountability.

Recommendations for Management

The analysis of the process flows for these activities indicate a need for the development of an automated Accounts Receivable system which includes the following:

- Pre-numbered invoicing
- Local and Statewide Accounts receivable Ledger
- Electronic Incoming Check Ledger or Cash Receipts Ledger

It was also noted when analyzing the ledger that over \$10,000 was received from ten different universities and technical schools. These funds are for reimbursements of tuition when a client withdraws from school. Conversations with the Case Services Department revealed that this is a common occurrence, but no mechanism is in place to track client withdrawals. The Department needs to track the withdrawals so that it can determine weather or not the refunds are being made and that they are made to the Department and not to the clients.

Bibliography

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South Carolina, Title 42. Workers' Compensation, Chapter 15,
Section 42-15-95. Retrieved November 17, 2004, from the World
Wide Web: <http://www.scstatehouse.net/html-pages/research.html>

South Carolina, Title 44. Health, Chapter 17, Section 44-7-325.
Retrieved November 17, 2004, from the World Wide Web:
<http://www.scstatehouse.net/html-pages/research.html>

South Carolina, Title 44. Health, Chapter 115, Section 44-115-80.
Retrieved November 17, 2004, from the World Wide Web:
<http://www.scstatehouse.net/html-pages/research.html>

Asbill, Kay. Personal interview. Date not recorded

Daniel, Sally. Personal interview. Date not recorded

Mandeville, Kerry. Personal interview. Date not recorded

Norryce, Margaret. Personal interview. Date not recorded

Rivers, Fran. Personal interview. Date not recorded

Roberts, Janice. Personal interview. Date not recorded

Tolson, Emmett. Personal interview. Date not recorded

Attachment 1

5.1.2.28 SCVR Form 73, Invoice (for Preparing Duplicate Copies of Documents)

This form is an invoice to be used when the Department is asked to furnish copies of confidential documents. Such documents may only be provided after a release agreement has been signed by the client (or parent, family member, guardian, advocate or authorized representative). The Department may charge the receiving party for duplicating the documents. For charge amounts, refer to the *Fee Schedule Manual*.

INVOICE

TO: _____ DATE: _____

RE: Service charge for preparing duplicate copies of confidential documents pertaining to applicant/client:

Name: _____

Address: _____

Social Security Number: _____

Number of Requested Copies @ \$.50 per copy = \$ _____

Remit to South Carolina Vocational Rehabilitation Department

Please return one copy of this invoice with your remittance.

Terms: Net 30 Days

Attachment 3

7.4.11 Duplicating fees and access to records

An individual may use SCVR Form 37A, Consent for the Release of Confidential Information to request that information be released to a designated third party. Records may not be removed from the SCVRD office, but they may be copied at a charge of 50 cents per page. Receipts should be issued in duplicate, with one to the purchaser and one to the SCVRD State Office along with the payment.

No charge will be made to cooperating agencies, such as the Department of Social Services, the Social Security Administration, the Department of Mental Health or other agencies providing services toward the client's rehabilitation.

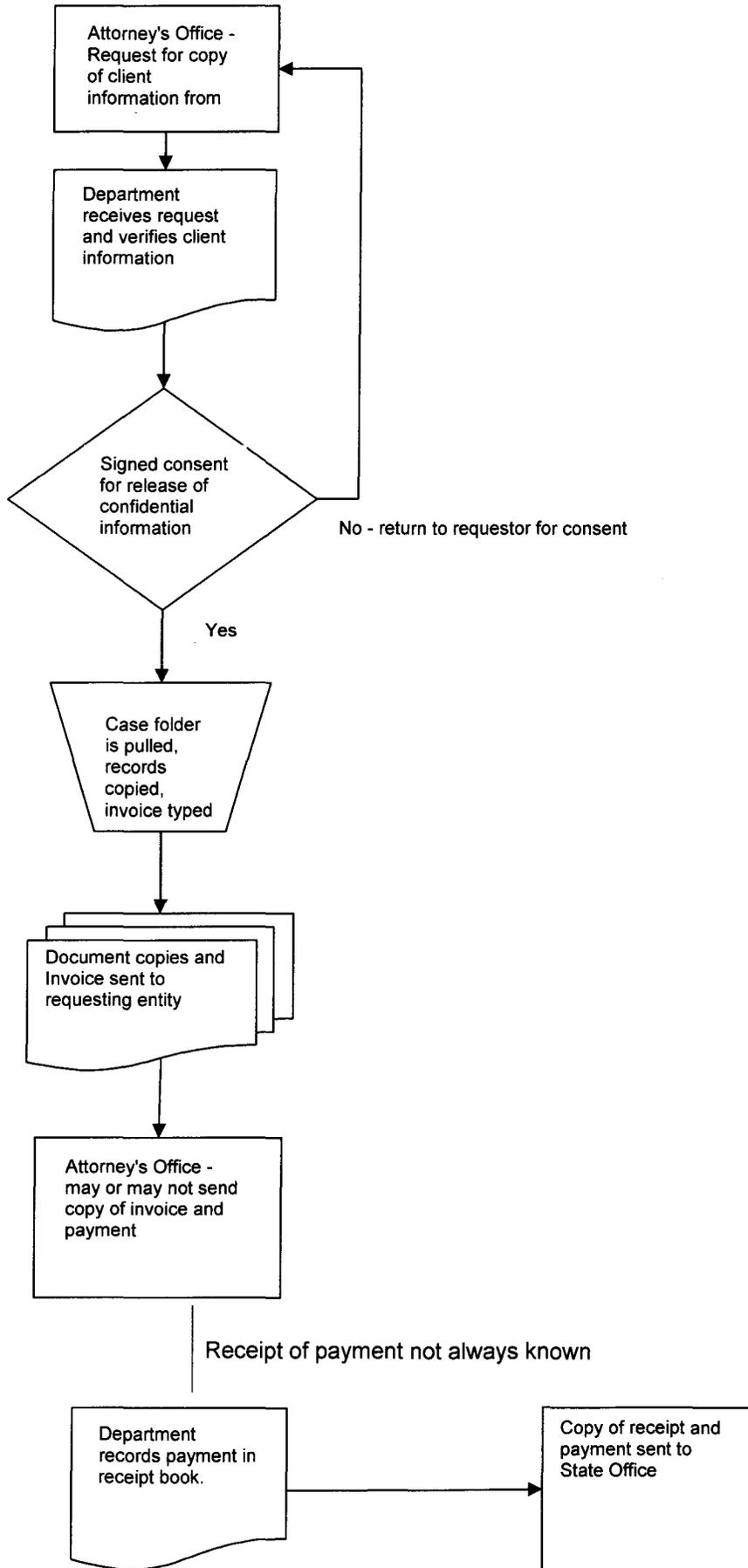
Each time information is requested, the individual must submit a new SCVR Form 37A. The disclosure must be accompanied by a statement to the effect: "Confidential and privileged information—not to be disclosed without the informed written consent of the individual to whom this information pertains." All such information is Department property and may be used only according to SCVRD regulations.

Attachment 4

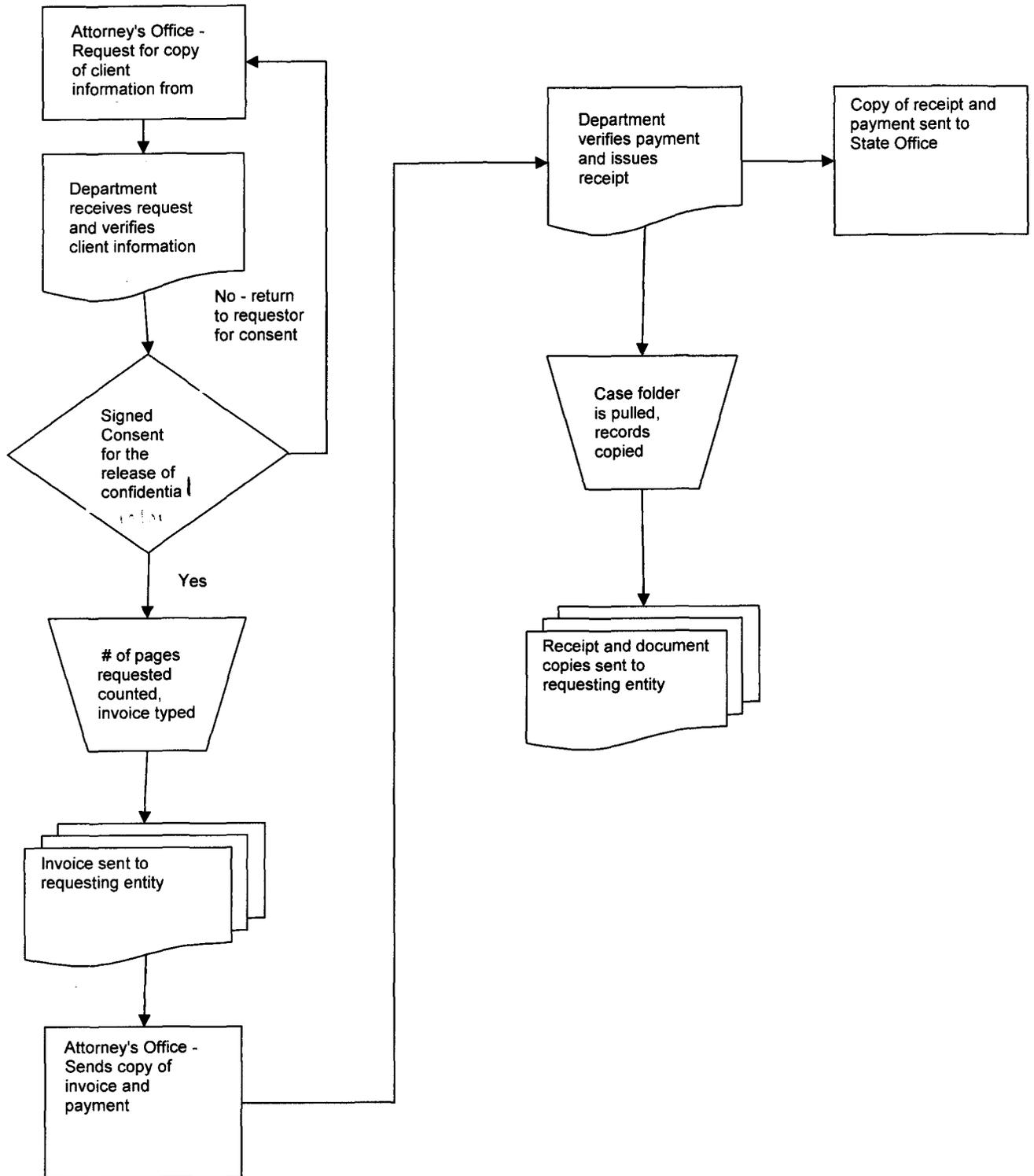
Funds Collected for Duplicating Records				
Location	2002	2003	2004 YTD	Total
1 Aiken	0.00	0.00	38.25	38.25
2 Anderson	0.00	42.00	0.00	42.00
3 Beaufort	212.67	0.00	0.00	212.67
4 Berkeley-Dorchester	0.00	0.00	0.00	0.00
5 Camden	0.00	124.34	9.06	133.40
6 Charleston	0.00	92.00	40.00	132.00
7 Conway	0.00	0.00	0.00	0.00
8 Florence	0.00	2.00	15.00	17.00
9 Gaffney	0.00	12.50	0.00	12.50
10 Greenville	29.50	19.00	56.50	105.00
11 Greenwood	0.00	2.00	13.00	15.00
12 Hartsville	16.50	12.00	79.17	107.67
13 Lancaster	0.00	0.00	0.00	0.00
14 Laurens	0.00	0.00	0.00	0.00
15 Lexington	0.00	0.00	0.00	0.00
16 Marlboro	0.00	0.00	0.00	0.00
17 Oconee-Pickens	3.50	0.00	0.00	3.50
18 Orangeburg	0.00	0.00	0.00	0.00
19 Richland	0.00	0.00	0.00	0.00
20 Rock Hill	0.00	0.00	0.00	0.00
21 Spartanburg	91.00	68.00	64.50	223.50
22 State Office	0.00	251.45	100.44	351.89
23 Sumter	0.00	0.00	0.00	0.00
24 Walterboro	0.00	0.00	0.00	0.00
Total	\$353.17	\$625.29	\$415.92	\$1,394.38

Number of Receipts Received for Duplicating Records				
Location	2002	2003	2004 YTD	Total
1 Aiken	0	0	1	1
2 Anderson	0	3	0	3
3 Beaufort	1	0	0	1
4 Berkeley-Dorchester	0	0	0	0
5 Camden	0	3	1	4
6 Charleston	0	2	2	4
7 Conway	0	0	0	0
8 Florence	0	1	1	2
9 Gaffney	0	4	0	4
10 Greenville	6	1	4	11
11 Greenwood	0	1	2	3
12 Hartsville	1	1	4	6
13 Lancaster	0	0	0	0
14 Laurens	0	0	0	0
15 Lexington	0	0	0	0
16 Marlboro	0	0	0	0
17 Oconee-Pickens	1	0	0	1
18 Orangeburg	0	0	0	0
19 Richland	0	0	0	0
20 Rock Hill	0	0	0	0
21 Spartanburg	11	11	9	31
22 State Office	0	4	5	9
23 Sumter	0	0	0	0
24 Walterboro	0	0	0	0
Total	20	31	29	80

Attachment 5



Attachment 6



Attachment 7
INVOICE

TO: _____ DATE: _____

RE: Service charge for preparing duplicate copies of confidential documents
pertaining to applicant/client:

Name: _____

Address: _____

Social Security Number: _____

Number of Requested Copies _____ x 50 cents per page = \$ _____

Administrative Handling Fee 15.00

Postage _____

Total =====

**** Unless other arrangements are made for receipt of documents, they will be
mailed to invoiced party after receipt of remittance ****

- Remit To: South Carolina Vocational Rehabilitation Department

Please return one copy of this Invoice with your remittance.

SCVR 73 Rev 01/05