

INTERIM INSTRUCTION NOTICE #12-004

Date of Notice: January 04, 2013

SUBJECT: Prepaid Debit Cards/Bus Pass Continuous Written Log

DISTRIBUTION: All Department of Behavioral Health (DBH) Employees
OBSOLETE: Upon completion of related policy and/or procedure

Effective Date January 4, 2013

From Fiscal Services/Procurement

Introduction The State of California Department of Health Care Services (DHCS) and the Department of Alcohol and Drug Programs (ADP) must comply with the County Auditor Controller/Treasurer/Tax Collector (ATC), Internal Controls.

The Internal Controls and Cash Manual (ICCM) from the ATC require a [“continuous written log”](#) (click on [log sample](#) for instructions on completing the continuous written log) to document and track all Prepaid card receipts (including bus passes), distributions, inter-departmental movements, and related documentation. Distribution procedures require that the continuous written log be signed by the requesting employee or the recipient to document receipt of the card.

Background The Standard Practice Manual Business Operations (BOP) 3030 and BOP 3030-01 require use of the continuous written log but did not contain a sample form or template. In the absence of an ATC required form for the [continuous written log](#), DBH Fiscal Services has prepared a continuous written log template based on the required documentation. This form is to be used by the fund custodian or designated DBH staff members.

The continuous written log contains fields of required information and must be kept current. It must be stored with the bus passes and/or prepaid cards in a designated secure locked location.

Authorization to record consumer names and signatures DBH is permitted to record consumer names and signatures on the log per Health Insurance Portability and Accountability Act of 1996 (HIPAA) code 45 CFR 164.502 (a) (1) (iii) Incidental Disclosures.

- Staff will use the client’s Simon number in lieu of their name whenever possible.
- For AB 109 client’s, the booking number will be used in lieu of their name whenever possible.

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Authorization to record consumer names and signatures (continued)

- If a client's name must be used, use their first initial and last name only.
 - If the continuous written log is requested from Fiscal Services by ATC and it contains client names, the name will be redacted by Fiscal Services before the continuous written log is submitted to ATC.
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Continuous written log procedure

Effective immediately, the continuous written log will be used to record all incoming prepaid cards or bus passes upon receipt and verification that the order is correct. As the cards or passes are disbursed, the disbursement information will be recorded on the continuous written log and the signature of the client or staff member receiving the pass or card will be recorded on the log at the time the card or pass is distributed.

If a client refuses to sign the log, a staff member must sign instead. There must be a note referring to the "Request to Distribute Prepaid Cards" form which the client must sign in order to receive the card or pass.

Any transfer of cards or passes between programs and/or County Departments must be recorded on the continuous written log for both the incoming and the outgoing programs/department.

At the end of each month, the prepaid debit/gift card inventory sheet and the prepaid debit/gift card reconciliation sheet are prepared by a designated DBH staff member. The total number of cards on hand will be compared against the continuous written log balance on hand. These two totals must match.

A copy of the continuous written log must be sent with the monthly inventory and reconciliation forms to DBH Fiscal Services/Procurement, Mail Code 0026 by the 5th working day of the following month by the designated DBH staff member.

Reporting Discrepancies

Any discrepancies discovered must be researched immediately by the Fund Custodian and reported to DBH Fiscal Services/Procurement at (909) 382-3043 or (909) 382-3044 within 24 hours of discovery of a loss.

Questions

Questions regarding this Interim Information Notice should be directed to Fiscal Services/Procurement (909) 382-3043 or (909) 382-3044.

References

[Standard Practice Manual BOP 3030](#)
[Standard Practice Manual BOP 3030-01](#)
