



**MULTIDISCIPLINARY
APPROACH TO
PREVENT FINANCIAL
CRIME:**

**ACTIVATING THE
TROOPS**

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ACTIVATING THE TROOPS

Sound the alarm, activate the troops...we need to act fast. Discover what resources are available in your arsenal to respond to the financial exploitation of a vulnerable adult swiftly and effectively. Identify what types of **multi-disciplinary teams** are at your disposal in your local area and how to contact those that would best assist in your investigation.

Learn how to differentiate between the **four most common types** of financial *Power of Attorney (POA)* documents and **two most common** types of guardianships.

Further, understanding the importance of the role of a trusted individual and successfully identifying “**customary**” transactions from the “**unusual**” transactions of your customers.



TOPICS OF DISCUSSION

1. Multidisciplinary groups in your area regarding financial exploitation.
2. Four most common types of Power of Attorney (POA).
3. Two most common types of Guardianships.
4. Key identifiers to identify and prevent financial exploitation.
5. Identifying customary vs. unusual characteristics of financial transactions.
6. Importance of a trusted individual.



MULTIDISCIPLINARY TEAMS (MDTs)

Professionals from diverse disciplines who work together to review cases of elder abuse and address systemic problems

AKA - Interdisciplinary Teams (I-TEAM)

Started in the 1980s



MOST COMMON MULTIDISCIPLINARY TEAMS (MDTs)

FATALITY REVIEW

Review of
Suspicious deaths
Or
“near-deaths”

MEDICALLY ORIENTED

Review of
Medical issues with
multiple medical
problems
Or
Cognitive decline

TRADITIONAL

Review of
Abuse
Neglect
Self-neglect
Mental health issues
High-risk situations
Guardianship



MOST COMMON MULTIDISCIPLINARY TEAMS (MDTs)

FINANCIAL ABUSE SPECIALIST TEAMS (FAST)

Social Agencies

Financial Institutions

Teams address the growing problem of financial abuse of elders and focus on complex financial abuse cases.

Law Enforcement

**District Attorney's
Office**



HOW TO FIND MDTs NEAR YOU



HOW TO FIND MDTs NEAR YOU

- Elder Justice Initiative
 - MDT Locator Map
 - Look up by State
- Technical Assistance Center
 - Consultations
- MDT Guide and Tool Kit
- Resources in your State
 - Identify who might be missing from your team



FUNCTIONS OF MDTs



FUNCTIONS OF MDTs

- Collaborative teamwork
 - Identify most beneficial outcome to all parties involved
- Cases reviewed
 - With strict confidentiality
- Network for future cases
 - Identify who can assist on specific case types





FUNCTIONS OF MDTs

- Advocating for change
- Planning and carrying out training events
- Coordinated investigations or care planning
- Assisting investigators to resolve difficult abuse cases
- Identifying service gaps
- Systems problems
- Sharing new services, programs and legislation





BARRIERS OF STARTING MDTs

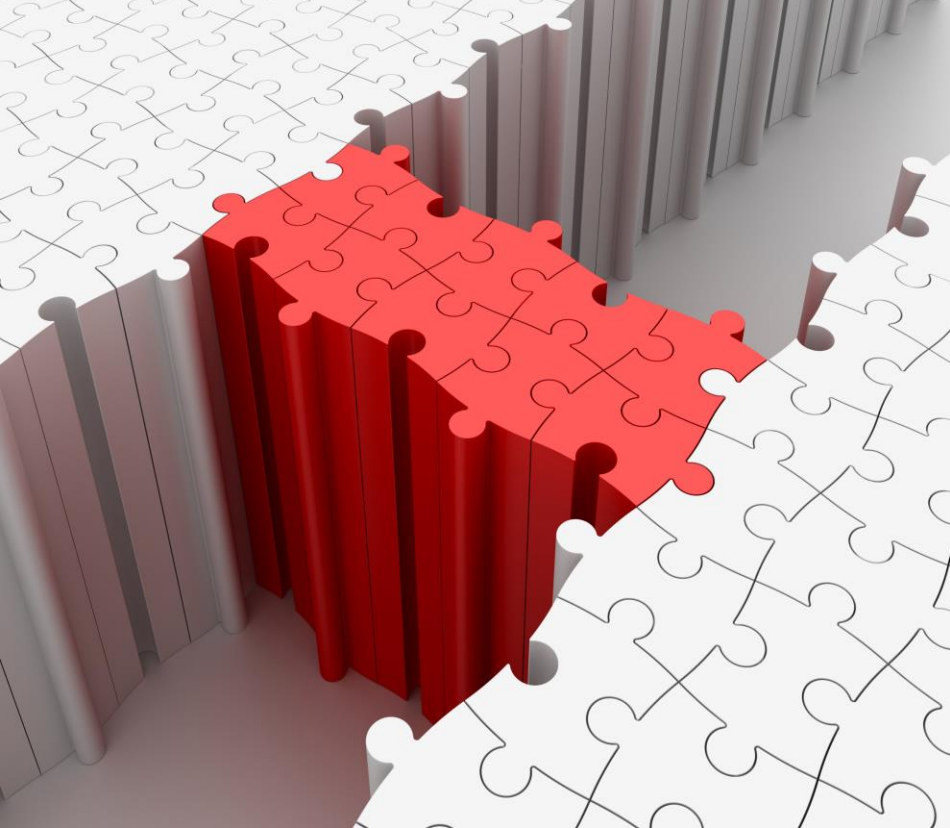


BARRIERS OF STARTING MDTs

- Composition of teams
- Policies and procedures
- Administration
- Funding
- Challenges to effective functioning
- Breaches in confidentiality



CHALLENGES OF MDTs

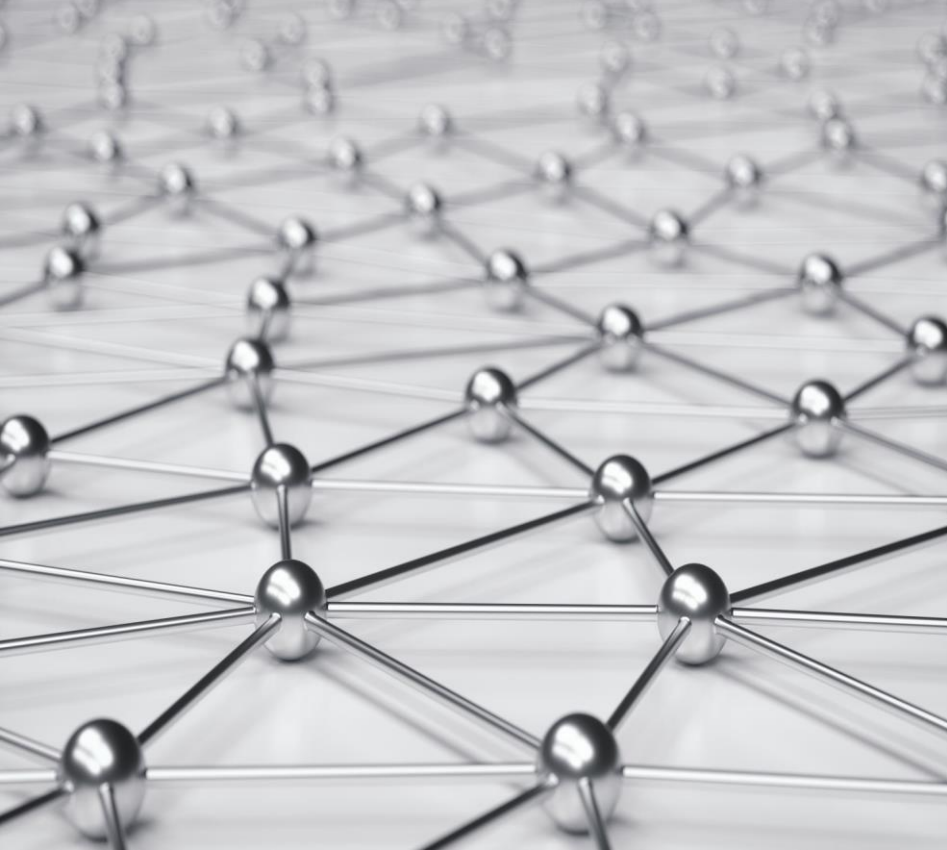


CHALLENGES OF MDTs

- Lack of participation by certain disciplines
- Maintaining an adequate number of cases
- Breaches in Confidentiality
- Animosity among members
- Failure to agreed upon follow up
- Members' feeling, time is not well spent



RESOURCES FOR MDTs



RESOURCES FOR MDTs

Governments have acknowledged the importance of MDTs by:

- Providing Resources
- Technical Assistance
- Statutory Authority





FAST MEETINGS



FAST MEETINGS

- Bi-Weekly
- Monthly
- Bi-monthly
- Quarterly
- Only when necessary





IMPORTANCE OF MEMORANDUMS OF UNDERSTANDING (MOU)

A decorative graphic in the top-left corner of the slide, featuring several thick, colorful lines (red, green, blue, yellow, pink, and purple) that intersect and overlap in a dynamic, abstract pattern.

IMPORTANCE OF MOUS

Confidentiality agreements

- Memorandum of Understanding (MOU)
 - Who can share what information and in what capacity
- Require members to sign contracts
- Terms of membership
- Affirming the agencies' commitment to assign representatives
- Replace representatives who are unable to meet their commitments





DISCIPLINES AND SERVICE CATEGORIES



DISCIPLINES & SERVICE CATEGORIES

**Financial
Institutions**

**Housing managers,
housing advocates,
realtors**

**Personnel from
assisted living
facilities**

**Members of public
utility boards**

**Representatives
from state long-
term care licensing
and regulatory
agencies**

**Adult Protective
Services (APS) or
Department on
Aging**



DISCIPLINES & SERVICE CATEGORIES

**In-Home Service
Providers**

**Hospital Social
Workers**

**Corporation
Counsels**

**Providers of
Services for
Persons with
Developmental
Disabilities**

**Homeless Shelter
Staff**

**District Attorney's
Office**



DISCIPLINES & SERVICE CATEGORIES

Health department personnel, health statistics specialists, health advocates

Certified public accountants (CPA)

Public Guardians

Hoarding Specialist

Dementia Care Specialist

Daily Money Manager



DISCIPLINES & SERVICE CATEGORIES

Animal care and
control officers

Public
Administrators

Probation and
Parole Personnel

Fire Fighters &
Emergency
Medical
Services (EMS)

Police Officers

Medical
Personal



DISCIPLINES & SERVICE CATEGORIES

Elder Rights
Project –
Function of
Legal Aid

Financial
Investors

Non-Profit
(Meals on
Wheels)

Civil Elder Law
Attorney

Clergy

Long Term Care
(LTC)
Ombudsman



CASE PRESENTATIONS



CASE PRESENTATIONS

- Client's living arrangement
- Support network
- Functional status
- Description of the abuse and/or other presenting problems
- History of attempted interventions or services



SOURCES OF FUNDING



SOURCES OF FUNDING

- In-Kind Support (Majority)
 - Care Patrol
 - American Association of Retired Persons (AARP)
 - Consumer Financial Protection Bureau (CFPB)
- Grants (Federal, State, Local)
- Foundations



GRANT FUNDING REQUIREMENTS



GRANT FUNDING REQUIREMENTS

- Policy and Procedures manual
 - Including job descriptions
- Feedback forms required at every meeting
- Provide case outcomes
 - Change in care teams
 - Successful Prosecutions
 - Asset recovery (Restitution ordered)
- Identify the number of hours participated outside the meeting times
 - Pro bono
 - Gifts in-kind (In-kind support)



IDENTIFYING HOSTING AGENCIES AND THEIR FOCUS



HOSTING AGENCIES

- Adult Protective Services (APS) (>50%)
- Area Agency on Aging (AAA)
- District Attorney's Office
- Sheriff's Department
- University
- Local Non-Profit





WHAT IS YOUR FOCUS

- Case Reviews
- Investigations
- Training
 - Vulnerable Adults
 - Caregivers
 - Law Enforcement
 - Emergency Medical Services (EMS)
 - Financial Institutions





NETWORK GOALS & ACTION STEPS



CASE REVIEW RESOLUTION

- Confidentiality Protocol
- Working relationships
- Advocate for the assignment of an Assistant District Attorney (ADA) to review all elder fraud cases
- Advocate for Law Enforcement to specialize in financial exploitation cases



COMMUNITY EDUCATION & OUTREACH

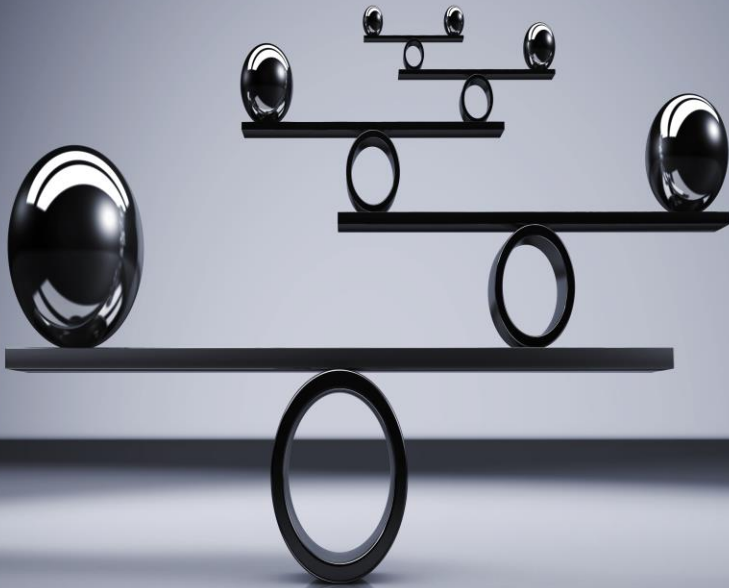
- Fraud Prevention Education
 - Seniors & Caregivers
- Distribution of educational materials
 - Meal Service Programs
 - Elder Day Care Programs
 - Bingo Events
- Develop Public Service Announcements (PSA) in partnership with other agencies



LOCAL OR REGIONAL PROTOCOLS AND RESPONSE

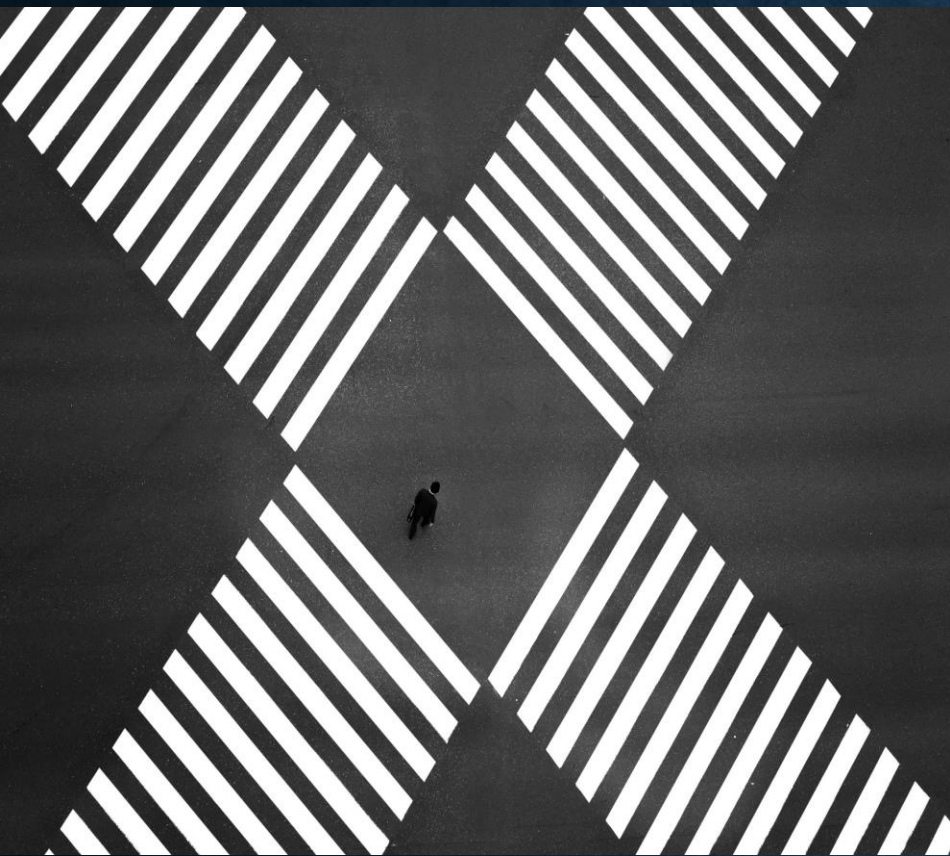
- Confidentiality protocols
- List of community resources and key contacts
- Flow chart illustrating how elder financial exploitation cases move through the system
- List of laws relevant to Adult Protective Services (APS), law enforcement, financial institutions and other network partners





POLICY DEVELOPMENT

- Encourage community leaders to prioritize elder financial exploitation
- Support state funding for agencies addressing elder financial exploitation
- Advocate for the creation of safe, accessible shelters for older adults experiencing domestic violence



CROSS-TRAINING

- Financial Institutions, attorneys, healthcare professionals, social service providers, & law enforcement
- Create a referral guide that includes each organization's role
- Secure funding to create a day-long interdisciplinary training
- Encourage banking association to provide ongoing training for financial professionals
- Host annual conference to share promising practices, case studies, & innovation
- Develop a common understanding of how different disciplines define "capacity"



BENEFITS OF MDTs



BENEFITS OF MDTs

- Strengthening community relationships
- Eliminating turf wars
- Promoting teamwork and cooperation
- Providing assistance on cases referred for guardianship
- Helping clients secure improved medical care
- Enhancing members' understanding of services





BEST PRACTICES

Establish the best practices for your agency to **Activate the Troops** necessary for your customers and your communities.



Identifying the
necessary team
members



Communicating with
your team



Respecting
confidentiality



Follow through with
follow up
responsibilities



COMMON TYPES OF POWER OF ATTORNEYS

- General
- Durable
- Springing
- Limited



GENERAL POA

Principal and their agent to act on behalf of the principal immediately upon signing of the document.

Examples:

- Opening Financial Accounts
- Managing Personal Finances



A general power of attorney arrangement is terminated, when the principal becomes; incapacitated, revokes the power of attorney or passes away.



DURABLE POA

Principal and their agent to act on behalf of the principal immediately upon signing of the document.

Examples:

- Opening Financial Accounts
- Managing Personal Finances



Includes a durable clause that maintains the power of attorney agent's abilities to continue after the principal becomes incapacitated.



LIMITED POA

Agent has specific powers limited to a certain area.

Examples:

- A power of attorney that grants the agent authority to sell a home or other piece of real estate.
- A power of attorney that grants the agent authority to conduct specific transactions, similar to allowing a financial institution to file the DOT paperwork when you purchase a vehicle.





SPRINGING POA

Agent ONLY has authority when a specified event occurs such as when the principal becomes incapacitated.

Example:

- When two doctors activate a healthcare POA , that action springs the Financial POA into effect.
- Parents are flying overseas and indicate between two specific dates the grandparents have authority to act as POA for minor children.



COMMON TYPES OF GUARDIANSHIPS

- Temporary
- Permanent
- Guardian of the Person
- Guardian of the Estate



GUARDIAN OF THE PERSON

Responsible for decisions about care provisions and living arrangements of the ward, including;

- Housing
- Medical Insurance/Benefits
- Nursing Care

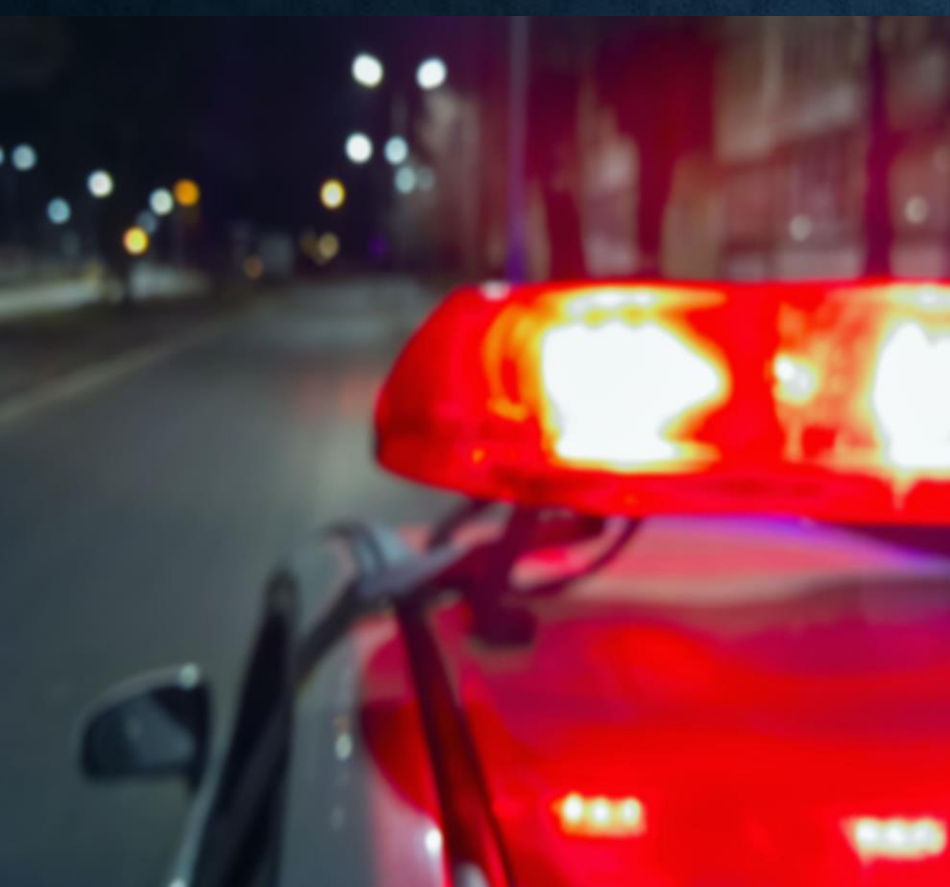


0.93*1.56 60.6100 0.5090 0.5090
0.02*3.64 0.5830 23.000 23.000
0.48*2.00 24.020 1.3800 1.3800
0.05*3.57 1.4600 9.0100 9.0100
0.39*4.09 9.2100 65.920 65.920
2.34*3.56 68.770 11.410 11.410
0.74*6.49 12.140 0.7700 0.7700
0.01*1.23 0.8100 7.6400 7.6400
0.40*5.23 8.1700 60.280 60.280
0.93*1.56 60.870 0.5090 0.5090
0.02*3.64 0.5830 23.000 23.000
0.48*2.00 24.020 1.3800 1.3800
0.05*3.57 1.4600 9.0100 9.0100
0.39*4.09 9.2100 65.920 65.920
2.34*3.56 68.770 11.410 11.410
0.74*6.49 12.140 0.7700 0.7700
0.01*1.23 0.8100 7.6400 7.6400
0.40*5.23 8.1700 60.280 60.280
0.93*1.56 60.6100 0.5090 0.5090

Charged with the ward's property and financial affairs,
including;

- Social Security Benefits
- Pension
- Financial Accounts
- Investment Accounts
- Direct Deposits
- Property Maintenance
- Property Mortgage





TEMPORARY GUARDIANSHIP

Depends on your state statute:

- In Illinois and Wisconsin, it is 60 days or less
- In Indiana, it is 90 days or less
- In Michigan, Minnesota, and Iowa, it is up to 6 months

Used in an emergency situation

Appointed to minimize disruption in early stages of the guardianship process

Limited to acts stated in the Order of Appointment





PERMANENT GUARDIANSHIP

Appointed by the Court to care for a Ward/Principal on a long-term basis

- Daily Care
- Overall Well Being





GUARDIAN AUTHORIZATION

Unless authorized in the court order,
a guardian cannot:

- Pay him/herself
- Pay his/her lawyer
- Give away any part of the Estate
- Borrow Money for the Estate





TRUSTED ABUSER



TRUSTED ABUSER

Characteristics:

- Extreme jealousy
- Possessiveness
- Unpredictability
- A bad temper
- Cruelty to animals (or threat of)
- Verbal Abuse
- Extremely controlling behavior (especially financials)
- Demeaning the victim (publicly or privately)





TRUSTED ABUSER

Why is important to recognize?

- Safety
- Undue Influence
- Reporting

How can you assist in documentation?

- Customer Service Notes
- Ask Questions
- Facts as Stated by Whom





KEY IDENTIFIERS

- Identify Financial Exploitation
- Prevent Financial Exploitation



IDENTIFY FINANCIAL EXPLOITATION

Sudden changes in bank accounts

- Change of authorized signatures
- Change of financial institutions
- Change of banking patterns
- Change in online banking
- Adding new or additional phone and emails
- Unexplained withdrawals of large sums of money
 - Especially when accompanied by another individual



PREVENT FINANCIAL EXPLOITATION

Daily Money Managers play a vital role in preventing and responding to elder financial exploitation

- They know their customers
- They have face-to-face interactions with older consumers

Collaborating with other stakeholders at the local, regional and state level is critical (MDTs)

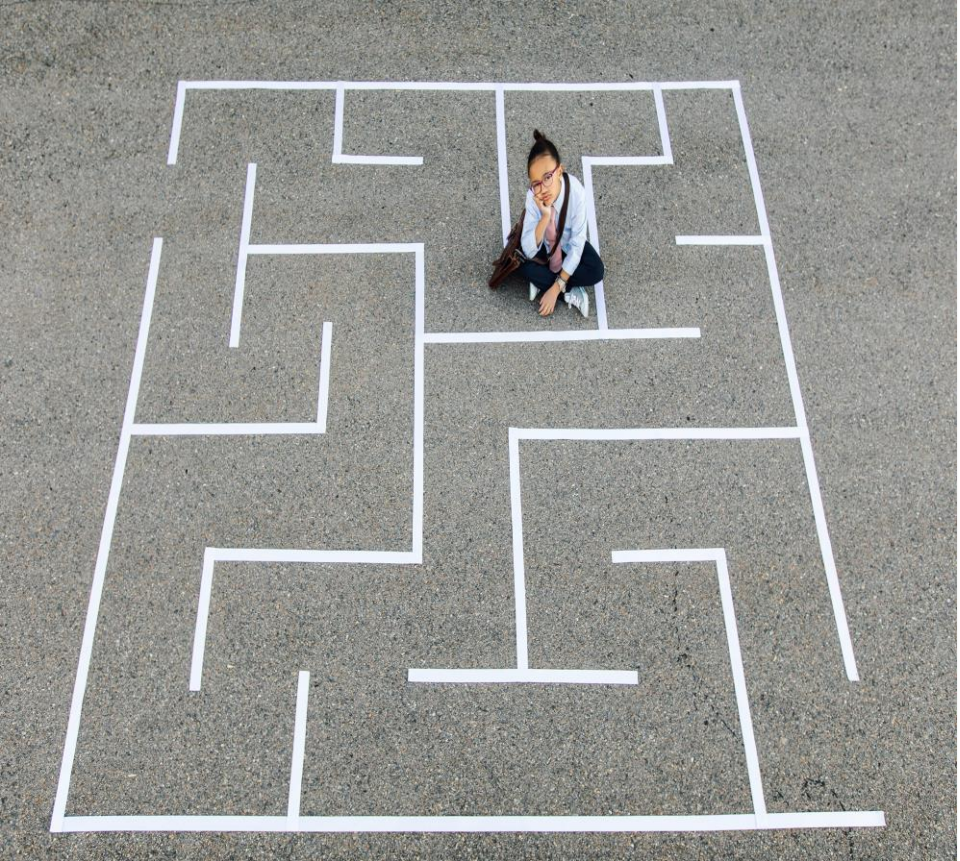
Training on red flags of elder financial exploitation



PREVENT FINANCIAL EXPLOITATION

Training on red flags of elder financial exploitation:

- Asking clients to explain and confirm transactions
- This is an unusually large request for withdrawal, are you sure you want cash?
- Have you taken steps to be sure the recipient is trustworthy?
- Confirm recent online banking activity because the transfer is a large amount.
- Can we talk privately for a moment?



PREVENT FINANCIAL EXPLOITATION

Training on red flags of elder financial exploitation

Recognizing signs of diminished capacity

- Memory loss
- Communication problems
- Calculation problems
- Disorientation

Have you consulted with your local Dementia Care Specialist?



FINANCIAL TRANSACTIONS

- Customary
- Unusual

CUSTOMARY TRANSACTIONS

Common payees

Common purchases

Consecutively numbered monetary instruments

Common physical location of purchases





UNUSUAL TRANSACTIONS

Changes of geographical location of transactions

Amount of transactions

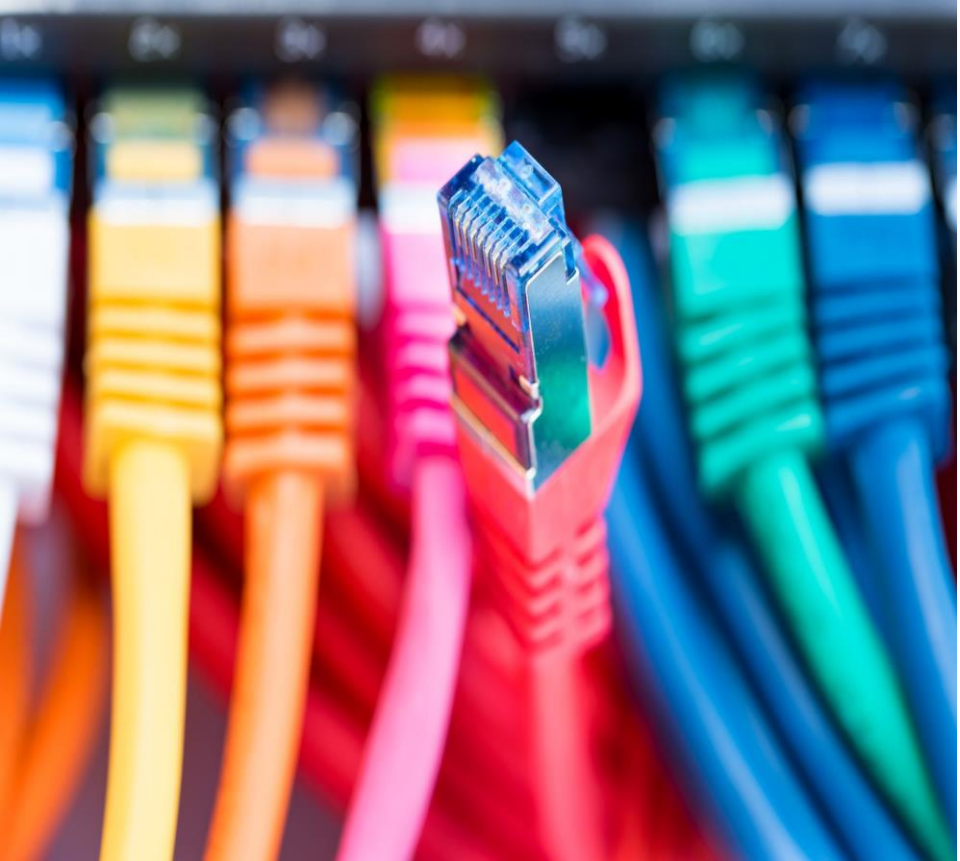
Quantity of transactions

Online banking for people who are not tech savvy

Adding an email to an account that had no previous online activity

Changes in addresses and phone numbers





HOW TO IDENTIFY UNUSUAL TRANSACTIONS

Review historical account activity

- Per month transactions 5 vs 25

New people in the lives of you clients

- Where did they meet; online or in-person?

Understanding clients normal spending

- Including holidays and special events





TRUSTED INDIVIDUAL

- Legislative Authority
- Company Policy/Procedures



TRUSTED INDIVIDUAL

Designated by the account holder at time of account opening or any time after.

A person acting as a delegate or proxy.

Financial Institutions can talk with them regarding concerning transactions to help determine if there should be cause for alarm.





INDIVIDUALIZE YOUR PLAN TO ACTIVATE THE TROOPS

- Policy and Procedures
- Training
- Networking



WHAT DOES YOUR PLAN LOOK LIKE?

Policy and Procedures

- What is currently in place?
- Where are the service gaps that need to be filled?

Training

- What types of training?
- How often will training be offered?
- Which segment of the employees will be involved?

Networking

- What groups will your organization be involved with?
- Who will be responsible for collaboration with these groups?





RESOURCES

Elder Justice Initiative Multidisciplinary Teams <https://www.justice.gov/elderjustice/mdt>

Elder Justice Initiative Network Locator Map <https://www.justice.gov/elderjustice/elder-justice-network-locator-map>

International Association of Financial Crimes Investigators (IAFCI) www.iafci.org;
https://www.iafci.org/Public/Consumer_Awareness/Community_Cautions/Public/Public_Awareness/Community_Cautions.aspx

North American Securities Administrators Association (NASAA) www.serveourseniors.org

U.S. Securities and Exchange Commission (SEC) <https://www.investor.gov/additional-resources/information/seniors>

National Center on Elder Abuse; Guardianship: Remedy vs. Enabler of Elder Abuse
https://ncea.acl.gov/NCEA/media/Publication/NCEA_GuardianshipRemedyVSEnabler.pdf



RESOURCES CONTINUED

Addressing the Challenge of Chronic Fraud Victimization, March 2021

https://www.aarp.org/content/dam/aarp/money/scams_fraud/2021/03/AARP-chronic-fraud-victimization-report-2-26.pdf

Journal of Elder Abuse and Neglect, July 2003; A National Look at Elder Abuse Multidisciplinary Teams

[https://www.researchgate.net/publication/232952929_A_National_Look_at_Elder_Abuse_Multidisciplinary_Teams#:~:text=Elder%20abuse%20multidisciplinary%20teams%20\(MDTs,abuse%20and%20address%20systemic%20problems](https://www.researchgate.net/publication/232952929_A_National_Look_at_Elder_Abuse_Multidisciplinary_Teams#:~:text=Elder%20abuse%20multidisciplinary%20teams%20(MDTs,abuse%20and%20address%20systemic%20problems)

National Center on Elder Abuse (NCEA) <https://ncea.acl.gov/What-We-Do/Practice/Multidisciplinary-Teams.aspx>

American Bar Association; Elder Abuse Fatality Review Teams

https://www.americanbar.org/content/dam/aba/administrative/law_aging/fatalitymanual.authcheckdam.pdf



RESOURCES CONTINUED

Elder Justice Initiative MDT Peer Support Listserv Community

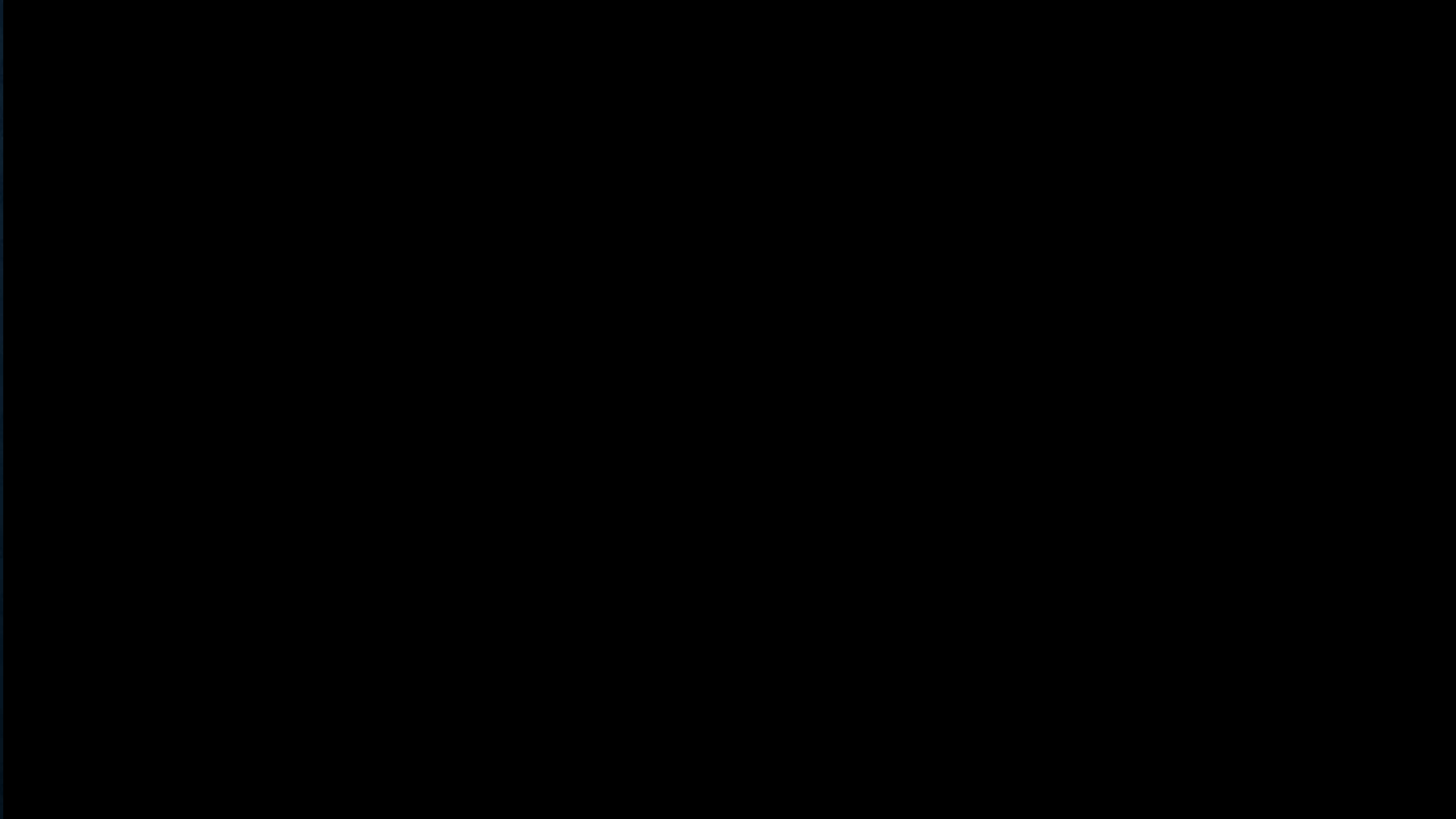
<https://www.justice.gov/elderjustice/national-elder-abuse-mdt-peer-support-community>

Elder Justice Initiative MDT webinars <https://www.justice.gov/elderjustice/video/fill-blanks-webinar-elder-abuse-case-review-mdts-any-stage-development>

Consumer Financial Protection Bureau <https://www.consumerfinance.gov/consumer-tools/educator-tools/resources-for-older-adults/elder-protection-networks/what-is-a-network/> & https://files.consumerfinance.gov/f/201603_cfpb_recommendations-and-report-for-financial-institutions-on-preventing-and-responding-to-elder-financial-exploitation.pdf

Kindred Health Care <https://www.kindredhealthcare.com/resources/blog-kindred-spirit/2017/06/02/4-powers-of-attorney-every-caregiver-should-know>

ELDER ABUSE: FINANCIAL EXPLOITATION OF A FAMILY MEMBER





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Thank you