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## A. Introduction

This section explains how to handle a request for assistance, from the initial contact, through the decision on how CGMA may be able to assist the client. Other sections of this manual provide the approved policies and procedures that are to be followed when providing assistance.

Since each applicant and case is unique, each request for assistance must be judged on its own merits. Casework decisions must be made as objectively as possible using this manual as the primary guide. Representatives must base their decision on facts and circumstances presented in the application, budget and supporting documentation, by interviewing the applicant, and verifying other information applicable to the case.

Proper case management is at the core of assisting our clients and will result in one or more of the following decisions being made for each case received:

- Financial Assistance will be provided
- Non-Financial Assistance will be provided
- Request for Assistance will be forwarded to the Next Higher Authority
- Request for Assistance will be disapproved

Due to the nature of casework, it is not feasible to anticipate all possible situations that can occur. There will be times an exception to normal CGMA policy may be justified. (See section 4-E for additional information concerning exceptions to CGMA policy, prior to providing financial assistance.)

It is CGMA's objective to meet valid financial need of our clients and their families and to help them to live within their means. To do this, both financial and non-financial assistance is available. Treating every client with respect and dignity is key to accomplishing these goals and developing goodwill between the client and CGMA.

## B. Processing a Request for Assistance

The following policies and procedures have been developed to aid in providing the proper assistance to our clients. They will also help to ensure that assistance is provided properly, uniformly and fairly throughout the Coast Guard. They are to be followed prior to providing assistance or disapproving the request for assistance or forwarding a case to the next higher authority.

- Interviewing the Client
- Reviewing Documentation

- Checking Basic Information
- Verifying Facts
- Making a Decision
- Repayment Terms
- Special Situations
- Providing Financial Assistance
- Providing Non-Financial Assistance
- Disapproving a Request for Assistance - Appeals
- What to do next

Additional guidance and interpretation of these policies and procedures is available from CGMA-HQ, when needed. Representatives are encouraged to contact CGMA-HQ, prior to providing assistance or disapproving a request for assistance, with questions they may have or for help in processing any case received. (See paragraph 2-D-2 for CGMA-HQ contact information.)

### **1. Interviewing the Client**

The first step in the assistance process is the interview. Through the interview you will assess the needs of the client and determine a viable solution to the problem. The interview may take place before or after a client has submitted an application for assistance and may involve more than one meeting.

It is important to understand that clients requesting assistance are often doing so at a time of unusual financial need or crises. It is also important to realize that the majority of our clients are "first time" visitors who may know very little about CGMA, how it operates, what types of assistance may be provided, how to apply, what is required, etc. Compassion, understanding and caring may be necessary to aid the client through their time of need.

Depending on the situation, Representatives should use the interview to:

- a. Educate the client about CGMA. We are a non-profit organization providing financial assistance (no-interest loans and grants) to meet the needs of our clients as covered by policies described in this manual. Financial assistance may be in the form of an interest-free loan, a grant or a combination loan and grant depending on the situation and the client's ability to repay. Non-financial assistance may include financial and budgeting counseling or referral

to other organizations. Loan repayment amounts will be based on the client's budget.

- b. Explain CGMA's confidentiality policy. Clients may feel that information they are required to provide or questions asked are private, embarrassing, or intrusive. The client has the right to expect that this personal information will remain private. At the same time, CGMA has an obligation to verify facts and information necessary to verify financial need exists prior to providing assistance. CGMA's confidentiality policy requires that the client's personal information will remain private. Representatives will not discuss information provided outside the office, nor divulge such matters to anyone, except on a need-to-know basis. This policy does not prevent verifying information provided. (See section 1-H for additional information concerning CGMA's confidentiality policy and to see why CGMA is not subject to the Freedom of Information Act (FOIA).)
- c. Listen to the client. Allow time for them to explain what the need is and the reason this need cannot be met using their own resources. This often requires helping the client to understand their entire financial situation and allowing them time to present a full explanation (the whole story) concerning their need and lack of funds. Work with the client to develop a solution to their situation.
- d. Review the request. If an application for assistance has already been completed, review the application with the client. If the application has not been completed, inform the client what is needed based on the assistance requested. If necessary, assist the client in completing the application for assistance and budget forms or compiling the appropriate supporting documents necessary to support their request for assistance.
- e. Inform the client as to what CGMA can and cannot do to assist and why. Inform the client of the various programs that are available. Explain or show the client the policy appropriate to the situation or request. Do not raise undue expectations by making the client feel that receiving assistance is assured or guaranteed, until a final decision has been made. This is particularly important in borderline cases, cases that fall outside of normal assistance situations and for cases that must be forwarded for review and approval. Explain in these situations that the request is considered borderline or that it is outside normal assistance policy, but everything possible will be done to give the request a careful and thorough review to see if providing an exception may be warranted. (See section 4-E for additional information concerning exception to policy.)
- f. Discuss potential disapproval of a request. If it appears that a request will be disapproved, inform the client of the reason(s) the request may be disapproved and explain what appeal options they have. (See paragraph 4-B-11 for

addition information concerning disapproving a request for assistance and the client's appeal options.)

- g. As appropriate: Representatives may also use the interview to review or complete other case management procedures listed below. When possible, these items should be completed prior to, or during the interview with the client. However, depending on the situation, they may be completed at a later time, but they must be completed prior to providing assistance.

## 2. Reviewing Documentation

All documentation submitted with each case is to be carefully reviewed:

- Applications - is the application completed accurately and thoroughly?
- Supporting Documentation - have all relevant supporting documents been provided and do they justify providing the level of assistance requested?
- Budget - has a budget been submitted, is it accurate, thorough and reasonable?
- Additional Documents - are additional documents or items (Power Of Attorney, Pre-Authorization Form, sponsor's approval, etc.) required?

See section 3-D, for additional information concerning items to be submitted when applying for assistance.

## 3. Checking Basic Information

Prior to considering assistance, the following items must be checked or verified; when possible, these items should be completed prior to interviewing the client:

- a. Identification: Each person who requests assistance must provide valid identification. The applicant's identification card must be verified. If the applicant claims their ID card has been lost or stolen, a police report or thorough explanation must be presented. Except in emergency situations, applicants will be expected to obtain a replacement ID card prior to assistance being provided.
- b. Status: Prior to providing assistance, Representatives must verify each individual's status. This can be accomplished by checking their military or civilian identification card. DEERS enrollment can be used to verify military dependency status.

- c. Eligibility: Care must be taken to ensure that assistance is only provided to eligible clients. (See section 3-B for detailed information concerning eligibility.)
- d. Authorized Assistance: Assistance may only be given for authorized items of need. (See section 3-C for additional information.)
- e. CGMA Restricted List: Using the CGMA Case Management Program (CGMA-CMP) or the Restricted List provided by CGMA-HQ, verify that the individual requesting assistance is not on the CGMA Restricted List.

**Note:** Individuals on the Restricted List are not eligible for any assistance without approval by CGMA-HQ. (See paragraph 5-D-4 for additional information concerning the CGMA Restricted List.)

- f. Past history of assistance: Using the CGMA Case Management Program (CGMA-CMP) review all past history of assistance. (See appendix E for additional information.)
- g. Authority: Prior to providing assistance, determine if the request is within your authority or will need to be forwarded to next higher authority in accordance with section 4-C and paragraph 4-B-8.

#### 4. Verifying Facts

Verifying facts and information provided by the client is essential in determining if a financial need exists and deciding the proper course of action to resolve the problem. Verifying the client's ID card, LES, finances, utility bills, car repair estimates, lease agreements, other supporting documents, etc., are necessary to verify what assistance is needed. Verification may be accomplished by sighting paperwork or by phone calls. Authorization to verify information is given when the applicant signs the CGMA Application for Assistance (CGMA Form 5). If an applicant refuses to allow verification, assistance will not be provided.

#### 5. Things to Consider When Making a Decision

Assistance must be based on need and policy. Each request is unique and may vary from as simple as a client who does not have enough available funds to make emergency travel arrangements to cases as complex as a client so overwhelmed with debt that basic living expenses cannot be met. Representatives must assess each request for assistance to determine what course of action will provide a solution to the problem. Many times, financial help is only a part of the solution. The client may also need financial counseling or other professional assistance to provide a long-term solution to the problem.

After gathering all of the facts; evaluating the case; interviewing the client; verifying eligibility; reviewing the application, budget and other supporting documentation; checking all necessary items; reviewing past history of assistance; verifying the facts of the case and determining that it meets the criteria for authorized assistance; a decision has to be made. Consider the following when making your decision.

- Is the applicant eligible for the type of assistance requested?
- Is the applicant on the CGMA Restricted List?
- Why does the applicant need the assistance?
- Is the lack of funds unexpected or the result of poor money management?
- Is the request based on need or desire?
- Is more information or supporting documentation required to make a decision?
- What can be done to solve the applicant's problem?
- Can the applicant manage the situation with his or her own resources?
- Are there other resources (funds, private or government programs, charities, etc.) that may be used to provide assistance?
- Has the applicant received assistance in the past for similar reasons?
- What can be done to prevent this problem from recurring?
- Is a need for financial counseling or other professional assistance indicated?
- If assistance is provided, will it solve the applicant's need or are other resources needed?
- Does the request fall within existing CGMA guidelines?
- Is an exception to normal policy justified?
- Will assistance be authorized as a loan, a grant, or a combination of both?
- Is non-financial assistance (counseling, referral, etc.) more appropriate?

- Does the request fall within your authority, or must it be forwarded?

Depending on the situation, you may wish to consider other items to assist you in making a decision on the case.

Using common sense and good judgment are key elements when determining how and when CGMA may provide assistance to a client.

Additional guidance and interpretation of these policies and procedures is available from CGMA-HQ, when needed. Representatives are encouraged to contact CGMA-HQ, prior to providing assistance or disapproving a request for assistance, with questions they may have or for help in processing any case received. (See paragraph 2-D-2 for CGMA-HQ contact information.)

## **6. When to Consider a Grant vs. a Loan**

Historically, the majority of financial assistance provided in the form of interest-free loans with repayment of these loans helping to fund future assistance. However, maintaining a person's sense of self-respect is an essential element of constructive assistance, and there are situations where a loan will offer little prospect of real help, or where repayment of a loan may create an additional hardship.

When determining whether to provide a grant versus a loan, the client's entire situation must be taken into account. What is the request for? What are the reasons the client does not have funds? What does the budget indicate concerning the client's financial status?

The type of assistance requested and the reason for lack of funds are important factors. It may be that the client has been irresponsible or simply living beyond their means. CGMA funds should not be used to reward financial irresponsibility. It would be unfair to provide a grant to a client who has unnecessarily acquired so much debt that a loan could not be repaid, while at the same time asking a client who has been living within a budget and doing without, to repay a loan.

The client's monthly budget is also an important factor. Nevertheless, a grant may not be indicated even though a client presently has a monthly deficit and cannot repay a loan at the time assistance is requested. When it appears that the client's ability to repay will change in a reasonable length of time, a loan would be more appropriate, with repayment deferred to allow time to work with a counselor or find other solutions to the financial problem.

Grants are not to be given for expenses that will be reimbursed by other sources such as insurance companies or the government.

A grant is not to be given simply as an expression of sympathy or to compensate for financial loss due to perceived or actual government error. In all cases, a client's present financial need is the determining factor.

Some programs have additional policies and limitations as to when a grant may or may not be provided. (See the appropriate type of assistance in section 3-C for additional information.)

All grant requests must be forwarded to the Executive Director or Board of Control for approval.

## **7. Repayment Terms**

Loan repayment terms are to be determined IAW 5-B.

## **8. Special Situations**

### **a. General**

Specific information concerning eligibility to receive assistance and limitations on the amount of assistance authorized under special situations is contained in paragraph 3-B-3. These special situations include:

- CGMA Sponsor not available
- Spouse does not have Power of Attorney
- Spouse has Power of Attorney
- Spouse has Pre-Authorization Form
- CGMA Sponsor Disapproves Request
- CGMA Sponsor in Confinement
- CGMA Sponsor AWOL or Declared a Deserter
- Marital Separation
- Abusive Situation
- Death or Critical Medical Condition of the CGMA Sponsor
- Pending Discharge, Separation or Termination
- CGMA Sponsor Approaching End of Obligated Service

**b. Assistance During Emergencies**

In emergency situations (death in the immediate family, emergency travel, and other emotionally sensitive situations described in paragraph 3-C-2)

Representatives may waive or postpone the requirement for providing full documentation and completing a budget until a later appropriate time.

**c. CGMA Sponsor not Available or Disapproves a Request**

The CGMA sponsor should normally be the applicant; however, there will be situations where eligible family members may request assistance. When possible, the CGMA sponsor should be contacted prior to providing assistance to coordinate and approve the request.

See paragraph 3-B-3 for additional eligibility and limitations on assistance under special circumstances.

See paragraph 3-D-7 for additional requirements when CGMA sponsor is not available.

**Note:** CGMA Sponsor - Non-Responsibility Statement

Contact CGMA-HQ if a CGMA sponsor initiates a specific written or oral request that CGMA refrain from providing any assistance to their eligible family members. CGMA will honor that request by having CGMA-HQ add the sponsor to the CGMA Restricted List and will place an appropriate comment on the sponsor's account to monitor the request. (See paragraph 2-D-2 for CGMA-HQ contact information.)

**d. Borderline Cases**

Borderline cases are those cases that do not quite fit into existing programs and policies. They are the type of case that after consideration may result in a logical decision to help the client within existing CGMA programs.

Borderline cases are not the type that, while they may appear to merit assistance, fall outside of authorized policies and programs and will require exception to existing policy.

While Representatives have a fiduciary responsibility to those who donate to see that existing policies and procedures are followed and that funds are used for the intended purpose, borderline cases generally are to be decided in the client's favor. A good guide to help determine if assistance should be provided in a borderline case would be to consider whether the typical Coast Guard member contributing to CGMA would feel the decision was in the best interest of the client and CGMA.

Although Representatives are authorized to decide borderline cases, this policy does not grant Representatives authority to make exceptions to existing policies. Cases that require exception to existing policies are to be processed in accordance with section 4-E.

Additional guidance and interpretation of this policy is available from CGMA-HQ, when needed. Representatives are encouraged to contact CGMA-HQ, prior to providing assistance or disapproving a request for assistance, with questions they may have or for help in processing any case received. (See paragraph 2-D-2 for CGMA-HQ contact information.)

#### **e. Clients Nearing Separation**

##### **1) General**

There are a variety of reasons a client may be nearing the end of their employment with the Coast Guard. Due to the nature of casework, it is not feasible to anticipate all possible situations that can occur as a client nears separation. Representatives should contact the CGMA-HQ Executive Director, Director of Administration or Director of Finance, with questions they may have or for help in processing a request for assistance for a client nearing separation. (See paragraph 2-D-2 for CGMA-HQ contact information.)

##### **2) Normal, Scheduled or Medical Separation**

###### **a. Emergency Assistance**

Emergency assistance, as defined in paragraph 3-C-2, may be provided in extenuating circumstances for bona fide emergencies to clients who are nearing separation from the Coast Guard, provided their separation is for normal or scheduled reasons. This may include clients who are separating from the Coast Guard at the end of their enlistment or obligated service, clients whose contract with the Coast Guard is ending, and clients who will receive a medical separation.

Emergency assistance may be provided in these situations even if the client's obligated service is scheduled to end before a loan could be repaid and when the client is not expected to remain with the Coast Guard. This does not include providing assistance for "an emergency in the mind of a client".

###### **b. Non-Emergency Assistance**

Non-emergency assistance may be given if the client is expected to remain with the Coast Guard after the end of the current enlistment or

obligation. This will normally apply to clients who are expected to reenlist or extend their enlistment at the end of their current enlistment. This may also apply when the client's contract with the Coast Guard is expected to be renewed or extended and may include others who are otherwise expected to remain employed by the Coast Guard following their current obligation. Non-emergency assistance may also be given to active duty members who are scheduled to retire and will receive their military retired pay from the Coast Guard.

### 3) Separation Resulting From Disciplinary Action

Assistance to clients who are facing disciplinary action that could result in discharge, separation or termination of employment from the Coast Guard will be limited to emergency assistance essential for basic needs to prevent privation.

#### f. Forwarding Cases for Determination

Cases that are beyond local approval authority and cases that require exception to existing policies must be forwarded to the next higher authority for review and determination. Each case forwarded must be fully supported with documentation and include a clear approval or disapproval recommendation from the Representative. Representatives will forward cases to the Executive Director. The Executive Director will forward cases to the Board of Control.

When a case is forwarded to the next higher authority:

- Contact the next higher authority to determine what procedures will be used to handle the case. (Clients should not be present when discussing cases with higher authority. This will ensure all decision makers can speak frankly and openly.) These procedures may include:
  - Establishing a point-of-contact
  - Determining how the case will be handled
  - Discussing what documentation will be required
  - Estimating when a decision may be made

Procedures may vary depending on the complexity and type of assistance requested.

- Explain to the client why the case must be forwarded

- Give the client an estimate as to when a response may be received
- Make no promises as to whether or not assistance will be approved
- Prepare a complete package to accompany the request. At a minimum this package will include:
  - A complete, accurate application for assistance and budget form
  - Sufficient supporting documentation to justify the level of assistance requested or exception to existing policy
  - A clear approval or disapproval recommendation including the reasons or basis upon which the recommendation was made
  - Information concerning past assistance provided to the client or their family members
  - Other appropriate enclosures as needed or requested by the higher authority
- Maintain a liaison with the approval authority to answer questions, provide additional documentation and to discuss the case as appropriate and necessary. (Clients should not be present when discussing cases with higher authority. This will ensure all decision makers can speak frankly and openly.)

While it is important to obtain the above documents for each request for assistance, it is particularly important to provide full and complete documentation, endorsements and recommendations when forwarding a case to the next higher level for determination.

The majority of cases reviewed by the Executive Director and the Board of Control are for large dollar amounts and for cases requiring exception to existing policies. Even though it may appear an individual requesting assistance has a legitimate need for assistance, poor documentation along with missing endorsements and recommendations may cause a case forward to higher authorities to be disapproved, returned or postponed, and may cause an undue hardship on our clients. Fully documenting and supporting cases forwarded, not only will allow the case to be quickly and accurately reviewed and processed, it will greatly improve the likelihood of a favorable decision for the client.

When a decision on the case has been made:

Approved Requests: Representatives will provide approved assistance as authorized by the higher authority.

Disapproved Requests: When the Executive Director or the Board of Control has disapproved a request for assistance, CGMA-HQ will notify the client in writing, with a copy to the Representative.

**Note:** Representatives are not authorized to make changes to decisions made by the higher authority without obtaining the higher authority's approval.

See section 3-D for additional information concerning items required when applying for assistance.

See section 4-C for additional information concerning approval authority including types of cases that must be forwarded to higher authority for review.

See section 4-E for additional information concerning exceptions to CGMA policies.

**Note:** In time-critical situations Representatives and the Executive Director may provide assistance up to their approval authority for cases that are forwarded for determination. This assistance will be limited to loans only, until the higher authority has made their decision on the case.

## 9. Providing Financial Assistance

### a. Prior to Providing Assistance

Discuss the following items with the client and ensure that the client:

- Understands their personal responsibility and terms for repaying any loan provided
- Agrees to keep CGMA advised of any change in duty assignments, mailing address, status, etc
- Acknowledges their responsibility to notify CGMA if future financial conditions make repayment of the loan a hardship
- Understands that if they fail to repay the loan they will be placed on the CGMA Restricted List and will not be able to receive further assistance without specific prior approval of CGMA-HQ, and that CGMA may use a collection agency to collect overdue accounts and this may be reflected on their credit report. (See section 5-D for additional information)

**b. Making Checks Payable to Creditors vs. Applicants**

Checks should be made payable to the creditor or the provider of services whenever possible. This may include making checks payable to a car repair facility, a landlord, utility companies, charge card companies, etc. Checks should be made payable to the applicant or client only in extenuating circumstances. Such circumstances should be annotated in the remarks block of the CGMA Form 52. Checks must be made payable to creditor or provider of services for all Debt Management cases.

Adhering to this policy is not intended as a sign of mistrust, or that the client will misuse the funds. It is intended to help ensure that CGMA funds are being used for their intended purpose. It also shortens the time necessary to make a payment, since the client will not have to deposit the CGMA check into their account, and then write another check to the creditor.

**c. Issuing the CGMA Check (CGMA Form 52)**

The CGMA Check (CGMA Form 52) must be used by CGMA Representatives to provide financial assistance to members of the Coast Guard family. CGMA Form 52 is a multi-task form used to:

- Provide CGMA Assistance
- Record loans and grants
- Acknowledge the applicant's receipt of assistance
- Provide repayment information
- Provide allotment authorization
- Allow for deduction from final pay for active duty members

Accountability: CGMA Checks (CGMA Form 52) are accountable and must be safeguarded at all times. CGMA Form 52s **must never be discarded or destroyed without authorization** from CGMA-HQ. See paragraph 6-C-3 for additional information.

Availability: See paragraph 6-C-4 for information on obtaining CGMA Form 52s.

Processing: Except in emergency situations, the Case Management Program (CMP) will be used to issue all CGMA financial assistance. See appendix E for additional information on using the CGMA-CMP program. When assistance is time-critical and the CGMA-CMP is not available, checks may

be prepared by hand or typewriter. The case must be entered in the CGMA-CMP once the system is again available. Checks for the Supplemental Education Grant (SEG) are not considered time-critical and must be prepared using the CGMA-CMP in all cases. See paragraph 3-C-7.c for processing SEG applications.

Signatures: After the CGMA Form 52 has been completed (printed, typed, or handwritten) the applicant and the Representative are to thoroughly review the form for accuracy and completeness. After verifying all the information is accurate, the CGMA Representative (this must be the same person whose name appears on the check) and the applicant are to **sign** and date the form.

Disposition: After the applicant and the Representative have signed the CGMA Form 52:

- The original check (the top section of the form) will be sent to the creditor or given to the applicant as appropriate
- The bottom section of the form will be retained in the local CGMA Representative's files, along with all supporting documents, applications (CGMA-5s), receipts, budget forms, etc. Do not forward supporting documents to CGMA-HQ. (See section 6-A for additional information concerning maintaining CGMA files)
- Give a copy of the completed Form CGMA 52 to the applicant

## 10. Providing Non-Financial Assistance

There will be times when providing direct financial assistance is not appropriate or is ineffective in solving a client's problem. There will also be times that financial assistance is only a part of the solution to a problem. The client may also need other resources, such as the help of a financial counselor, a health benefit advisor or another professional to explore ways to provide a long-term solution to their problem.

In these types of cases, Representatives are asked to assist the client in finding a non-financial solution to their problem. This may include arranging for professional financial or budgeting counseling, referring the client to the appropriate Work-Life office, health benefit advisor, or another individual or organization better suited to assist the client in resolving their problem.

Representatives are not expected to perform all of the work for a client, nor are they expected to personally provide services for which they are not trained, and should refer the client to the appropriate expert or professional for assistance.

See paragraph 3-C-6 for additional information concerning financial counseling and debt management.

## **11. Disapproving a Request for Assistance and Appeals**

### **a. Disapproving a Request**

There will be times when a request for assistance must be disapproved. In most cases the request will be disapproved for one of the following reasons:

- Client is not eligible for assistance
- Type of assistance requested is not authorized
- Need for assistance is not justified
- Exception to policy is not warranted
- Client is on the CGMA Restricted List
- Client did not provide necessary applications, documents, budget, etc
- Client did not cooperate or assist in working toward a solution
- Client provides misleading information

In rare instances, there will be no realistic solution or referral that the client is willing to accept. CGMA can advise, suggest, recommend and refer a client; however, there will be some cases where CGMA cannot resolve all of the client's problems. In these cases, clients must assume the responsibility of resolving their own problem.

When the decision is made to disapprove a request for assistance, the Representative will:

- Complete a Disapproval/Appeal Statement (CGMA Form 17)
- Inform the client of the reason(s) the request for assistance was disapproved and explain what appeal options are available
- Have the client sign the Disapproval/Appeal Statement indicating they have been counseled as to why their request was disapproved and that they understand their appeal options (send a copy to CGMA-HQ)
- If the client submits an appeal, forward the complete request for assistance package, including the Disapproval/Appeal Statement and

any additional documents submitted with the appeal, to the next higher authority

### **b. First Appeal**

When a request for assistance has been disapproved, the client may request that the case be forwarded for a second review and recommendation as to whether or not the request for assistance should be approved or disapproved.

In most situations the initial decision to disapprove a request for assistance will be made by a Representative or an Assistant Representative. In these cases, the Representative will forward the client's appeal to the Executive Director for a second review. In a similar manner, the Executive Director will send cases initially disapproved by the Executive Director to the Board of Control for review.

To initiate the appeal process the client must indicate in writing why they feel their request merits further consideration. The client may add any new or additional supporting documentation with the appeal request. They may also discuss their case, if they wish, with another member of their command. This may be their supervisor, the Command Master Chief, the Executive Officer, or others within their chain-of-command. The client may ask that individual to submit an endorsement that will accompany the request for assistance throughout the appeal process.

- If the second review returns a decision to approve the request, assistance will be provided as approved
- If the Executive Director made the second review and concurs with the original decision to disapprove the request for assistance, the client may invoke one final appeal
- If the Board of Control made the second review and concurs with the original decision to disapprove the request for assistance, no additional appeals are authorized

**Note:** Representatives are not authorized to make changes to decisions made by the higher authority without obtaining the higher authority's approval

### **c. Final Appeal**

In cases where the Executive Director made the second review and concurred with the original decision to deny a request, the client may request one final review. In these cases, the client's appeal will be forwarded, via the Executive Director, to the Board of Control for final review. The Board's decision will be final in all cases.

- If the final review returns a decision to approve the request, assistance will be provided as approved by the Board of Control
- No additional appeal options exist if the decision of the final review concurs with the decision to disapprove the request for assistance

**Note:** The Executive Director and Representatives are not authorized to make changes to decisions made by the Board of Control without obtaining the Board's approval.

## 12. Closing the Case

After financial or non-financial assistance is provided, or when a request for assistance is disapproved (including any appeals), a case is considered closed and the Representative is to take the following actions:

- Provide the client with a copy of all documentation
- Create and maintain a case file on each applicant for future reference. Include all documentation relating to the case. (See section 6-A for additional information concerning record keeping requirements)

## C. Loan/Grant Approval Authority Guidelines

### 1. General

The Executive Director and Representatives are authorized to provide CGMA loans and grants in conformity with the bylaws, directives, publications, policies and procedures of Coast Guard Mutual Assistance as established by the Board of Control. All assistance must be provided in compliance with these rules and regulations. Additionally, as a private non-profit organization, all CGMA activity must be consistent with IRS and other government agency regulations as they relate to non-profit organizations.

Additional guidance and interpretation of these policies and procedures is available from CGMA-HQ, when needed. Representatives are encouraged to contact CGMA-HQ, prior to approving or disapproving a request for assistance, with questions they may have or for help in processing any case received. (See paragraph 2-D-2 for CGMA-HQ contact information.)

Due to the nature of casework, it is not feasible to anticipate all possible situations that can occur. There will be times an exception to normal CGMA policy may be justified. (See section 4-E for additional information concerning exceptions to CGMA policy, prior to providing financial assistance.)

### 2. Executive Director

Certain programs and types of assistance have additional eligibility criteria, financial need requirements, and other conditions and restrictions that may apply. Prior to providing assistance, the Executive Director is to carefully review the appropriate section(s) of this manual pertaining to the type of assistance being requested to determine if additional conditions or restrictions apply.

#### a. The Executive Director May Approve

Within the guidelines discussed above, the Executive Director may approve:

- Assistance for all eligible CGMA clients, including CGMA Representatives and Assistant Representatives
- Loans up to \$6,000 provided the amount given will not cause a client's outstanding loan balance to exceed \$6,000
- Grants (other than SEG grants) may be authorized up to \$6,000, provided the accumulated total of grants given to an individual does not exceed \$6,000 (not including SEG grant amounts)

- When appropriate, both a loan up to \$6,000 and a grant up to \$6,000, for a total assistance amount of \$12,000 (provided the above limits are not exceeded)
- Requests for the conversion of an existing loan into a grant. (See section 5-F for additional information)

**b. The Executive Director May Not Approve**

Except as noted, requests for the types of assistance below must be forwarded to the Board of Control for review. (See paragraph 4-B-8-f for additional requirements and information concerning forwarding cases for review, including how the case is to be processed once a decision has been returned.) Also, see paragraphs 2-E-1-m and 2-E-1-n for additional information concerning the Executive Director's responsibilities for cases forwarded by Representatives.

The Executive Director **is not authorized** to approve the following types of assistance:

- Assistance for him or herself
- Any assistance that would cause a client's total outstanding loan balance to exceed \$6,000
- Grants (other than SEG grants) that would cause a client's accumulated total of grants received to exceed \$6,000
- Assistance for members from other societies (Army, Navy, Marine Corps or Air Force). In most cases, the appropriate society's headquarters must be contacted to obtain approval when providing assistance to a member from another branch of the service. (See section 4-D for additional information)

CGMA-HQ must be contacted in the following situations: (See paragraph 2-D-2 for CGMA-HQ contact information.)

- Coast Guard members attempting to receive assistance through another relief society (Air Force Aid Society, Army Emergency Relief, Navy-Marine Corps Relief Society, or the American Red Cross). (See section 4-D for additional information)
- Assistance for clients who appear on the CGMA Restricted List. (See paragraph 5-D-4 for additional information)

- Refunds for clients who have overpaid their CGMA loan. (See paragraph 5-I-3 for additional information)
- Fees or expenses for a client to obtain financial, debt management, or other counseling. (See CGMA Form 22 – CGMA/NFCC Agreement for additional information)
- Vehicle Purchase or Replacement. (See paragraph 3-C-3-d for additional information)

**Note:** Depending on the emergent situation, the Executive Director may approve loans and/or grants up to the \$6,000 limit that may be immediately provided to the client, with any request in excess of these limits forwarded to the Board of Control for consideration.

### 3. Representatives

Certain programs and types of assistance have additional eligibility criteria, financial need requirements, and other conditions and restrictions that may apply. Prior to providing assistance, Representatives are to carefully review the section(s) of this manual pertaining to the type of assistance being requested to determine if additional conditions or restrictions apply.

#### a. Representatives May Approve

Within the guidelines discussed above, Representatives may approve the following:

- Assistance (loans) for all eligible CGMA clients, including Assistant Representatives
- Loans up to \$3,000 provided the amount given will not cause a client's outstanding loan balance to exceed \$3,000. However, Representatives are not authorized to approve loans under the Housing Assistance or Debt Management Programs

#### b. Representatives May Not Approve

Except as noted, requests for the following types of assistance **may not be approved** by Representatives and must be forwarded to the Executive Director for review. (See paragraph 4-B-8-f for additional requirements and information concerning forwarding cases for review, including how to process the case once a decision has been returned.)

- Assistance for themselves or other Representatives. (Assistant Representatives may not provide assistance for themselves, Representatives, or other Assistant Representatives)
- Assistance that would cause a client's total outstanding loan balance to exceed \$3,000
- Grants, except SEG Grants. (Representatives are authorized to disburse SEG grants **only** using the CGMA-CMP program.) (see paragraph 3-C-7-c for additional information)
- Debt Management Assistance
- Housing Assistance
- Requests to convert an existing loan into a grant. (See section 5-F for additional information)
- Assistance for members from other societies (Army, Navy, Marine Corps or Air Force). The appropriate society's headquarters must be contacted to obtain approval when providing assistance to a member from another branch of the service. (See section 4-D for additional information)
- Vehicle Purchase or Replacement. (See paragraph 3-C-3-d for additional information)

CGMA-HQ must be contacted in the following situations: (See paragraph 2-D-2 for CGMA-HQ contact information)

- Coast Guard members attempting to receive assistance through another relief society (Air Force Aid Society, Army Emergency Relief, Navy-Marine Corps Relief Society, or the American Red Cross) (See section 4-D for additional information)
- Assistance for clients who appear on the CGMA Restricted List. (See section 5-D for additional information)
- Refunds for clients who have overpaid their CGMA loan. (See section 5-J for additional information)
- Fees or expenses for a client to obtain financial, debt management, or other counseling. (See CGMA Form 22 – CGMA/NFCC Agreement for additional information)
- Vehicle Purchase or Replacement

**Note:** Depending on the emergent situation, Representatives may approve loans up to the \$3,000 limit that may be immediately provided to the client, with any request in excess of this limit forwarded to the Executive Director for review.

## D. Cooperation With Other Military Aid Societies

### 1. General

Under reciprocal agreements with the other Military Aid Societies (MAS), service personnel and their eligible family members from the other branches of the armed forces who are unable to apply to their own aid society may apply for emergency assistance from Coast Guard Mutual Assistance.

Additionally, Coast Guard service personnel and their eligible family members may request emergency assistance from these aid societies when they are unable to apply to Coast Guard Mutual Assistance. Coast Guard service personnel may also contact the American Red Cross (ARC) for emergency assistance when they are not able to apply to Coast Guard Mutual Assistance or one of the other Military Aid Society offices.

Under these agreements, cross-service assistance falls into two categories.

- Assistance for emergency travel or to avoid immediate privation
- All other types of assistance

### 2. Assistance for Emergency Travel or to Avoid Immediate Privation

When possible, Representatives should obtain authorization from the appropriate aid society headquarters prior to providing assistance to a member from another branch of the service. However, a Memorandum of Agreement (MOA) among the four societies provides for blanket authority to provide assistance for emergency travel or to avoid immediate privation. Under the MOA, Representatives may provide the following assistance without advance authorization from the service personnel's parent aid society:

- A loan of up to \$2,500 for emergency travel may be provided in the case of a death or serious illness of an immediate family member
- A loan of up to \$200 may be provided to avoid immediate privation
- A loan of up to \$600 may be provided for travel and basic living expenses when an evacuation order has been issued for pending natural disasters such as a hurricane

To qualify under this blanket authority, all of the following conditions must exist:

- The applicant must be a regular active duty member or an eligible family member of a regular active duty member

- The applicant must present a proper military identification card (or appropriate documentation)
- The emergency situation must be verified or the applicant has orders for emergency leave or regular/emergency leave under emergency conditions
- The estimated time of separation (ETS) or the end of active service (EAS) must be more than 90 days
- The loan repayment must be within 10 months or prior to the ETS/EAS, whichever is less

Apply the same emergency leave or immediate privation criteria to such applicants as you would to Coast Guard applicants. If the request doesn't meet CGMA criteria, or if the above conditions are not met, contact the service member's parent MAS Headquarters for approval or disapproval of the request.

When a loan is given under the blanket authority, you must contact the appropriate aid society headquarters by the next business day to provide them with the loan information.

### 3. All Other Types of Assistance

When a request for any type of assistance, other than discussed above, is received from a member of another branch of the service, you must contact the client's aid society headquarters for approval or denial of the request.

After the client has completed a CGMA Application for Assistance (CGMA Form 5) and the client's identification and circumstances of the request verified, contact the service member's parent MAS headquarters for approval or disapproval of the request. (See paragraph 4-D-5 for contact information.)

CGMA assistance policies discussed elsewhere in this manual do not apply when providing assistance to a member from another branch of the service. If assistance has been approved by the parent MAS for one of their members, you may provide assistance to the client as authorized. However, if the parent MAS denies the request, assistance from CGMA is not authorized. **No exceptions.**

### 4. Special Processing

After assistance has been approved by the parent MAS, process the request using the CGMA-CMP just as you would for a CGMA client, with the following exceptions:

- Use the correct Branch of Service code when completing block 9 of the CGMA Form 52

- Use the appropriate code (initials) for the aid society as Final Approval Authority in block 17 of the CGMA Form 52
- Enter the name of the person who approved the assistance along with any control number provided in the Remarks block
- Make sure the client understands that the loan is being made by their aid society and that they will be expected to repay their aid society, not CGMA
- If a grant has been approved, process it the same as a loan. Be sure to note in the Remarks block that a grant was approved

Once assistance is provided, send the following documentation to CGMA-HQ:

- A copy of the completed CGMA Application for Assistance (CGMA Form 5)
- A photocopy of the service member's ID card

CGMA-HQ will use the information provided to request reimbursement from the appropriate military aid society.

**Note:** Representatives are not authorized to approve assistance for Coast Guard personnel via other Military Aid Societies. Refer all such cases to the CGMA-HQ Executive Director, Director of Administration or Director of Finance (See paragraph 2-D-2 for CGMA-HQ Points of Contact information.)

## 5. Contacts

Military Aid Society	Working Hours	After Hours
<p><b>Army Emergency Relief</b> 200 Stovall Street Alexandria, VA 22332</p> <p><a href="http://www.aerhq.org">www.aerhq.org</a></p>	<p>(703) 325-0184 0185 0333</p>	<p>(703) 697-0218 DSN: 227-0218</p>
<p><b>Air Force Aid Society</b> 241 18<sup>th</sup> Street South, Suite 202 Arlington, VA 22202</p> <p><a href="http://www.afas.org">www.afas.org</a></p>	<p>(703) 607-3060</p>	<p>(571) 314-3628</p>
<p><b>Navy-Marine Corps Relief Society</b> 875 N. Randolph Street Suite 225 Arlington, VA 22203</p> <p><a href="http://www.nmcrcs.org">www.nmcrcs.org</a></p>	<p>(703) 696-4904 (800) 654-8364</p>	<p>(877) 600-0582 Pager: Leave your phone number for a caseworker to return your call.</p>
<p><b>American Red Cross</b></p> <p><a href="http://www.redcross.org">www.redcross.org</a></p>	<p>Contact the local office in your community.</p>	

## E. Exceptions to Policy

On a case-by-case basis, the Executive Director and the Board of Control may consider cases that warrant exception to existing CGMA policy.

### 1. General

CGMA encourages assistance decisions to be made at the lowest level possible. This chapter has been developed in such a way as to provide Representatives with guidance and flexibility to make the decision whether or not to provide assistance for the majority of the cases they may receive, without having to contact a higher authority. However, in casework it is not feasible to anticipate all possible situations that can occur. There will be times an exception to normal CGMA policy may be justified.

When a request is received for assistance that does not fall into one of the authorized categories or criteria listed in this chapter, the case must be treated as an exception to policy. This also applies when the client requesting assistance does not meet the listed eligibility requirements.

### 2. When to Request an Exception

When a case can be justified and supported by the Representative and where a verified need exists, exception to assistance policy may be considered on a case-by-case basis to meet legitimate, acceptable, reasonable financial needs of our clients. An exception to policy should be requested when the request is not within existing CGMA guidelines, but:

- It is considered in the best interest of both the client and CGMA
- Circumstances indicate that it is the correct solution to the client's problem
- It is felt that an exception to policy is warranted based on the merits of the case

### 3. Who is Authorized to Make Exceptions to Policy

Representatives: are authorized to provide assistance in borderline cases but they are not authorized to make exceptions to existing CGMA policy. (See paragraph 4-B-8-d for additional information concerning borderline cases.)

The Executive Director: except as noted below, the Executive Director is authorized to make exceptions to existing CGMA policy, up to the authority level discussed in paragraph 4-C-2-a.

Board of Control: Requests for exception to existing CGMA policy for the following types of assistance must be forwarded to the Board of Control. (See the appropriate paragraph for additional information):

- Cases beyond the Executive Director's Authority (4-C-2-b)
- Certain Medical Expenses (3-C-4-f)
- Certain Funeral Expenses (3-C-2-b)
- Certain Emergency Travel (3-C-2-c)
- Other Adoption Expenses (3-C-3-f)
- Education loans, including bridge loans (3-C-7)
- Assistance to Department of Defense members (4-D)

**Note:** In addition to the restrictions listed, certain programs and types of assistance have additional eligibility criteria, financial need requirements, and other conditions and restrictions that may apply. Prior to providing assistance, carefully review the appropriate section(s) of this manual pertaining to the type of assistance being requested to determine if additional conditions or restrictions apply.

#### 4. How to Request an Exception

Requests for assistance meeting the criteria for requesting an exception to existing CGMA policy must be forwarded to the next higher authority for determination. (See paragraph 4-B-8-f for additional information.)

Additional guidance and interpretation of these policies and procedures is available from CGMA-HQ. Representatives are encouraged to contact the CGMA-HQ Executive Director, Director of Administration or Director of Finance, prior to providing assistance or disapproving a request for assistance, with questions they may have or for help in processing any case received. (See paragraph 2-D-2 for CGMA-HQ contact information.)

#### F. Additional Information

Questions, comments and recommendations concerning this chapter should be directed to the CGMA-HQ Executive Director, Director of Administration or Director of Finance. (See paragraph 2-D-2 for CGMA-HQ contact information.)