

***CHILDREN'S SERVICES ACT
PROGRAM AUDIT***

***Pittsylvania County
Self-Assessment Validation***

Final Audit Report No. 24-2020

July 28, 2021



Office of Children's Services
Empowering communities to serve youth

Report Disclaimer

Due to the COVID-19 pandemic, onsite visits to validate management's conclusions have been suspended until further notice. In lieu of onsite visits, self-assessment validation activities were conducted remotely.



COMMONWEALTH of VIRGINIA

Scott Reizer, M.S.
Executive Director

OFFICE OF CHILDREN'S SERVICES
Administering the Children's Services Act

July 28, 2021

Monica Karavanic, CPMT Chair
734 Main Street
Danville, VA 24541

RE: Pittsylvania County CSA Program Self-Assessment Validation
Final Report, File No.24-2020

Dear Ms. Karavanic,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2020-2021, the Pittsylvania County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Pittsylvania County CSA program covering the period July 1, 2018 through June 30, 2019, our independent validation:

Concur

Partially Concur

Does Not Concur

with the conclusion reported by the Pittsylvania County CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of the Pittsylvania County CSA Program. The explanations for our assessment results are as follows:

The Pittsylvania County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. A summary of internal control weaknesses reported by the CPMT is included as an attachment to this report. However, validation procedures identified significant deficiencies not originally reported by the CPMT. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affected CSA funded activities, as well as monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organizations internal control structure are considered significant. Specifics pertaining to the Pittsylvania County CSA Program are detailed on pages 2 through 3.

SIGNIFICANT NON-COMPLIANCE AND INTERNAL CONTROL WEAKNESS

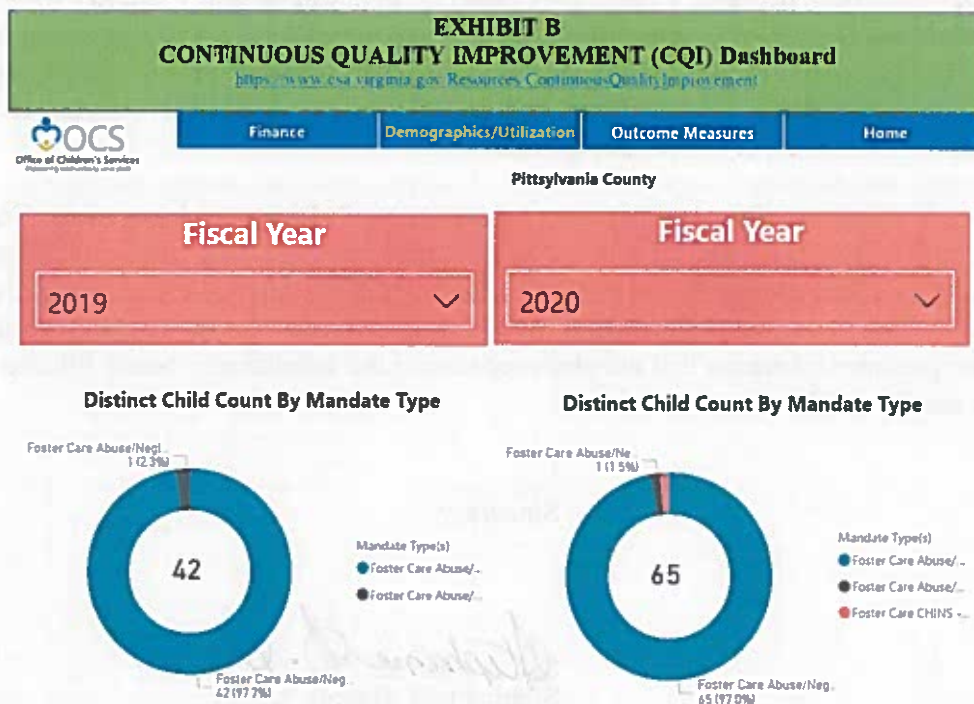
1. Statement of Economic Interests forms were not completed in accordance with requirements established by Code of Virginia (COV) § 2.2-5207 and related guidance documented in OCS Administrative Memo #18-02 Statement of Economic Interest Filings for FAPT and CPMT Members. The following exceptions were observed:
 - A. Two non-public officials appointed to the Family Assessment and Planning Team (FAPT) did not complete the form upon appointment as required by CSA statute.
 - B. The appropriate form documenting the personal interest representatives (public and non-public officials) appointed to CPMT and FAPT was not utilized. The applicable members completed the Financial Disclosure Form instead of the Statement of Economic Interest Form (long version) as directed by Administrative Memo #18-02.
 - C. While the Statement of Economic Interest Form was submitted by two public officials serving on FAPT, the data elements were either left blank or appeared to be redacted. The only information appearing on the forms was the individuals name and dated signature

2. Adequate measures were not always consistently applied to ensure effective and efficient use of financial resources that could be used to offset the costs incurred for CSA pool funded services and/or to meet the needs of the children and families. CSA Policy 4.5.2 Pool Fund Reimbursement requires localities to report at least quarterly all CSA eligible expenditures and applicable refunds in accordance with appropriate expenditure-reporting categories and refund classification. Local Expenditure Data Reporting System (LEDRS) Refund reports show zero collections in FY 19-20 for the following reporting categories: SSA/SSI/VA Benefits, DCSE Collections, and Reclaimed under Title IV-E.

Refunds were last reported for those categories in Fiscal Year 2018. However, other data collected by OCS for Pittsylvania County denotes between 42-65 foster care clients received CSA funded services (Refer to Exhibit B on page 3). The Pittsylvania County Department of Social Services is responsible for reporting and refunding DCSE and Title IV-E collections to CSA. According to local CSA representatives, the period of concern coincides with the change in Pittsylvania County Department of Social Services staff responsible for oversight of this task.

Exhibit A LEDRS Refund Reports for FY 2019-2020 https://www.csa.virginia.gov/OCSPoolReport/PoolReports/RefundReport									
FY	FIPS	Locality	Vendor Refunds	Parental Co-Pay	SSA, SSI, VA, Benefits	Support through DCSE	Reclaimed under IV-E	Other	Total
19	143	Pittsylvania	\$38,496.05	\$1,498.87	\$0	\$0	\$0	\$2,215.50	\$42,210.42
20	143	Pittsylvania	\$42,738.12	\$140.20	\$0	\$0	\$0	\$0	\$42,878.32

Continued on page 3



RECOMMENDATIONS

1. The CPMT should ensure that all persons appointed to serve as members of CPMT and FAPT, including alternates, fully complete the appropriate Statement of Economic Interest forms (long version) immediately upon appointment in accordance with CSA statutes and official guidance. Further, these forms are official public records.
2. In accordance with SEC Policy 4.5.2, the CPMT should determine if there were any SSA/SSI/VA benefits, DCSE collections, and/or Reclaimed Title IV-E reimbursements for the current and previous fiscal years and report the refunds in LEDRS with their next pool reimbursement.

CLIENT COMMENT

The CSA Coordinator has already sent out the long form Statements of Economic Interest to those members of CPMT and FAPT that it is required for to ensure that we are in compliance going forward. The CSA Coordinator also spoke with the Clerk for the County that sends out the statements yearly to ensure that going forward the correct forms are sent out to our members. The CSA Coordinator is in the process of assigning a new report preparer to be able to file the refunds at DSS. They will be going back and filing everything from 2019 forward to ensure that we are in compliance going forward.

Monica Karavanic, CPMT Chair
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The Office of Children's Services respectfully requests that you submit a quality improvement plan (QIP) to address the observations outlined in this report no later than 30 days from receipt of this report. We ask that you notify this office as QIP tasks identified to address significant observations are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Pittsylvania County Community Policy and Management Teams and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Cheryl Boswell, CSA Coordinator during our review. Ms. Boswell's efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
David M. Smitherman, Pittsylvania County Administrator
and CPMT Fiscal Agent
Cheryl Boswell, CSA Coordinator

Attachment



CSA Self-Assessment Validation
Pittsylvania County CSA Program Audit- SAV
Summary of Self-Reported Non-Compliance Observations and Internal Control Weaknesses

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/ Status
<p>A signed Certificate of Records Destruction (RM-3 Form) must be approved by the designated records officer and on file in the agency or locality before records can be destroyed. After the records are destroyed, the original signed RM-3 Form must be sent to the Library of Virginia.</p> <p>Pittsylvania CSA had been submitting RM-3 (paper copies). However, forms are not remitted online. The CSA Office is coordinating with the county's designated Records Retention Officer on protocols for destruction.</p>	<p>Library of Virginia Records Management Retention Schedule GS-15</p> <p>ARMICS¹</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>6/7/2020 Completed</p>

ARMICS (Agency Risk Management and Internal Control Standards):

- ¹Control Environment
- ²Information and Communication
- ³Monitoring

