

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

***Shenandoah County
Self-Assessment Validation***

Final Audit Report No. 21-2022

March 3, 2023



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 Reiner, M.S.
Executive Director

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

March 3, 2023

Leea Shirley, CPMT Chair
Lord Fairfax Health District
10 Baker Street
Winchester, VA 22601

RE: Shenandoah County CSA Program Self-Assessment Validation
Final Report, File No. 21-2022

Dear Ms. Shirley,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2022, the Shenandoah 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 completed by the Shenandoah County CSA program February 1, 2022, and covering the period July 1, 2020, through June 30, 2021, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion reported by the Shenandoah 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. The explanations for our assessment results are as follows:

The Shenandoah County CPMT concluded that only non-significant compliance and/or internal control weakness observations were noted. However, validation procedures identified deficiencies indicating non-compliance in the local CSA program not identified by the CPMT. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics are detailed on page 2.

SIGNIFICANT NON-COMPLIANCE OBSERVATION - REPEAT OBSERVATION

Eight (8) client case files were examined to confirm that required documentation was maintained in support of and to validate Family Assessment Planning Team (FAPT) and/or Multidisciplinary Team, (MDT) referral and CPMT funding decisions. Individual Family Service Plans (IFSP) were not documented sufficiently to evidence effective service planning in accordance with Code of Virginia (COV) § 2.2-5208, § 2.2-5209 and CSA Policy 3.5 Records Management. Specifically, Shenandoah’s Individual Family Service Plan/Utilization Review (IFSP/UR) documents did not always include key data elements such as: actual FAPT date, mandate type, updated strengths and needs, family participants, discharge planning, UR activities, and meeting type (FAPT or Family Partnership). At least two (2) exceptions were noted in 75% (6 of 8) of the client files reviewed.

Similar observations were reported in prior Shenandoah County CSA Program audits dated December 12, 2013, and July 9, 2018.

Client File Review Exception Summary Data Element Omissions	
Exception Rate	Description
8 of 8 (100%)	A. Mandate type
6 of 8 (75%)	B. Discharge planning; meeting type (FAPT or Family Partnership)
5 of 8 (62%)	C. Utilization review and actual FAPT date
3 of 8 (38%)	D. Family participation
2 of 8 (13%)	E. Updated strengths and needs, goals and objectives

RECOMMENDATIONS

1. The CPMT should consider adopting the model IFSP and UR addendum accessible on the CSA website to record service planning activities such as but not limited to updated goals and objectives, strengths and needs, discharge planning, and evidence of parent/guardian participation and/or consent to service plan. When FAPT meetings are conducted virtually, the IFSP should clearly document the attendance of all team members, as well as parent and/or guardian participation and consent to the service plan.
2. All service plans should reflect the actual meeting date and mandate type.
3. The CPMT should adopt a quality assurance case file review process to ensure compliance with CSA statutory requirements.

CLIENT COMMENT

“The Shenandoah County CPMT adopted an adapted version of the model IFSP and UR addendum for local use in the January 2023 CPMT meeting after an extensive review and transition process. FAPT meetings are no longer held completely virtually, though the option still remains for families and providers to participate using the virtual platform or

CLIENT COMMENT

via telephone, as is available. This is noted on the IFSP. With the transition to primarily in person there has slowly been an increase in family participation, with most cases having both family participation as well as providers attending the meeting to discuss the progress of the case. The CSA Coordinator noted in this process that the current CPMT approved IFSP does not include the mandate type, however this will be added back in, and additional training given to case managers to improve accuracy on this and all elements of the IFSP. The FAPT currently meets weekly for an all-day meeting to improve on service planning and case outcomes.”

The Office of Children’s Services respectfully requests that you submit a quality improvement plan (QIP) to address the observation 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 Shenandoah County Community Policy and Management Team, CSA staff, and partners for their contributions to completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Aaron Hernandez, CSA Coordinator. Ms. Hernandez’s efforts enabled the audit staff to resolve any questions/concerns observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Evan Vass, Shenandoah County Administrator
Lara O'Connor, CPMT Fiscal Agent
Aaron Hernandez, CSA Coordinator