



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

## Administrative Memo #18-02

**To:** CPMT Chairs  
CSA Coordinators

**From:** Scott Reiner, Executive Director 

**CC:** Stephanie Bacote, Audit Manager

**Date:** January 16, 2018

**Subject:** Statement of Economic Interest Filings for FAPT and CPMT Members

OCS has recently received guidance from the Virginia Conflict of Interest and Ethics Advisory Council (the Council) regarding the required filing of the Statement of Economic Interest forms for members of the CPMT and FAPT within the local CSA programs. This memo is intended to clarify those requirements.

### Non-salaried citizen members (i.e., parent and private provider representatives):

These members must file the "long-form" Statement of Economic Interests disclosure upon appointment to their positions as required by §2.2-5205 (CPMT) and §2.2-5207 (FAPT). This disclosure form, as specified in §2.2-3117 of the Code of Virginia, shall be made available by the clerk of the local governing body and the filing is made with the clerk, who is responsible for maintaining these filings as public records for five years. Citizen members of CPMT and FAPT are required to file only upon appointment and not annually as has been previously indicated in guidance from this Office. This is likely a change from current practice for many jurisdictions

### Salaried employees of local governmental agencies:

If a local government employee who serves on the CPMT or FAPT is required to file by the local governing body, these members will generally file the Statement of Economic Interests disclosure, although there may be some exceptions for certain positions. The appropriate disclosure form shall be made available by the clerk of the governing body and the filing is made with the clerk, who is responsible for maintaining these filings as public records for five years. Local government employees required to file must do so annually, on or before February 1, in accordance with §2.2-3115.

Appropriate updates to the CSA User Guide will be made and distributed in the near future. Additional guidance on these requirements should be directed to the local attorney for your jurisdiction or to the Council at: <http://ethics.dls.virginia.gov/index.asp>.

Thank you for your attention to this matter.