



# COMMONWEALTH of VIRGINIA

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

October 20, 2015

Mr. Lanny Large, CPMT Chair  
Dickenson County CSA Program  
POB 386  
Clintwood, VA 24228

RE: Dickenson County Children's Services Act (CSA) Program Audit Self-Assessment Validation  
File No. 27-2013

Dear Mr. Large,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2013-2015, the Dickenson County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local CSA Program by the established due date of June 30, 2013. An on-site visit was scheduled and conducted by our Program Compliance Specialist, supervised by the OCS Program Audit Manager, on April 10, 2015 to perform the independent validation phase of the process.

Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Dickenson County CSA program, our independent validation:

Concurs  Partially Concurs  Does Not Concur

with the conclusion reported by the Dickenson County CPMT. We agree that no significant internal weakness were found in the design or operation of the processes or services conducted on behalf of Dickenson County CSA. However, we do not agree with the Dickenson County CPMT's conclusion that there were no significant non-compliance observations. The explanations for our assessment results are as follows:

*The Dickenson County CPMT concluded that there were only non-significant compliance and/or internal control weaknesses identified. However, validation procedures of the locally prepared CSA Self-Assessment Workbook noted a major deficiency<sup>1</sup> that resulted in non-compliance with the Children's Service Act by the local CSA program. Specifically, non-compliance with the statutory requirements of the Children's Services Act is deemed significant because the local program is not fully operating in accordance with the laws of the Commonwealth of Virginia. Further, the Dickenson County CPMT had developed a quality improvement plan to address the deficiency with a target date of December 31, 2013. However, the quality improvement plan tasks have not been implemented and the non-compliance matter has not been resolved to date. Refer to page 2 for a detailed description of the non-compliance observation.*

<sup>1</sup> Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

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<b>SIGNIFICANT NON-COMPLIANCE OBSERVATION</b>	
<p>The Dickenson County CPMT has not developed and documented a written policy to govern the provision of Intensive Care Coordination (ICC) services. The quality improvement plan prepared by the CPMT was largely centered on collaborating with the local behavioral health agency to designate an individual for the position that will meet the qualifications and training requirement outlined the ICC policy adopted by the State Executive Council (SEC) in April, 2013. It also states...</p> <p>“The CPMT is attempting to correct this issue. Corrective action will not be complete until the designated ICC has obtained all necessary training. Due to limited training opportunities, the corrective action may require a larger timeframe for completion.”</p> <p>The CPMT’s duties and responsibilities to establish a policy/procedure is not contingent upon designation of a specific individual to provide the service. Where the Community Service Board (CSB) was previously the sole provider of ICC services, the ICC policy adopted in April 2013 expanded the pool of providers to include privately operated vendors. The purpose of the policy is to govern the provision of services and ensure consistency in application of identified requirements regardless of the chosen service provider.</p> <p><i>Criteria: § 2.2-5206 Community policy and management team; powers and duties, Item 17            Administrative Memo #13-02 <a href="#">Intensive Care Coordination Policy</a></i></p>	
<b>RECOMMENDATION</b>	The Dickenson County CPMT should take appropriate action to ensure that the non-compliance issue is addressed in the immediate future.
<b>CLIENT COMMENT</b>	The ICC policy has been included in the Dickenson County CPMT By-Laws and Policy/Procedure Manual. The CPMT continues to attempt to correct this issue. The CPMT continues to work with the local mental health agency to provide a designated ICC.

OCS has received the quality improvement plan submitted on behalf of the Dickenson County CPMT and respectfully requests that you provide an update regarding your progress in implementing the specified improvements. We would like to thank the Dickenson County CPMT 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 Ambra Deel, CSA Coordinator during our on-site visit. Ms. Deel’s efforts enabled the audit staff to quickly 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, Interim Executive Director  
 G. David Moore, Jr., Dickenson County Administrator  
 Susan B. Mullins, CPMT Fiscal Agent  
 Ambra Deel, CSA Coordinator