



# COMMONWEALTH of VIRGINIA

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Executive Director

OFFICE OF COMPREHENSIVE SERVICES  
*Administering the Comprehensive Services Act for At-Risk Youth and Families*

## **ADMINISTRATIVE MEMO #12-06**

**TO:** FISCAL AGENTS  
CPMT CHAIRS  
CSA COORDINATORS

**FROM:** SUSAN CUMBIA CLARE

**DATE:** JUNE 13, 2012

**SUBJECT:** TITLE IV-E ADJUSTMENTS

In response to the results of a federal review in August 2010 of Title IV-E, the Virginia Department of Social Services initiated a comprehensive program of on-site and desk reviews of local social service agencies. VDSS plans to conduct a review in each local social service agency by October 2012. As a result of these reviews, numerous payment and eligibility errors have been identified across the Commonwealth.

The Office of Comprehensive Services has been working closely with the Virginia Department of Social Services (VDSS) to ensure appropriate management of corrections/adjustments that may be required as identified by these local reviews. Adjustments between Title IV-E and CSA funds have been common over the years and are reported through Pool Reimbursement Request reports. The process for making appropriate adjustments to CSA expenditures remains unchanged.

With some exceptions, the use of CSA State Pool Funds is subject to federal requirements for the provision of foster care services. As such, IV-E payment errors identified through the IV-E reviews may or may not be reimbursable through CSA. Local fiscal agents are reminded that all CSA expenditure claims – including those represented by adjustments via a Pool Reimbursement Request – must be eligible for CSA funding.

Common errors identified in the VDSS reviews which are not eligible for CSA reimbursement include, but are not limited, to the following:

- 1) Youth was placed in an unapproved foster home,

- 2) VEMAT was not conducted/reviewed as required,
- 3) Court review was not conducted in a timely manner.

Exceptions which allow the use of State Pool funds when Title IV-E funds are disallowed include payments to eligible youth over the age of eighteen for independent living stipends and services, and payments for a youth who is in a residential facility when the facility receives a provisional license and it is determined to be in the youth's best interest to remain in the facility.

In accordance with the denial of funds policies adopted by the State Executive Council in June 2011, VDSS will share with OCS the results of Title IV-E findings that evidence non-compliance with requirements for the provision of foster care services and resulted in the identification of payments ineligible for Title IV-E funds. Localities must ensure that only those payments eligible for CSA funding are included in adjustments on Pool Reimbursement Request reports.

Federal requirements allow retroactive billing to Title IV-E for payments eligible for Title IV-E funding but paid through other funds streams. These retroactive billings are restricted to eight quarters. Thus, adjustments between Title IV-E and CSA are restricted to the current quarter and seven previous quarters. While OCS allows adjustments to be reflected during a single quarter, federal reporting requires that adjustments be made according to appropriate quarters.

Additional information regarding process for making Title IV-E and CSA adjustments will be distributed no later than June 30, 2012. At that time, VDSS will distribute to local DSS agencies a spreadsheet for reporting adjustments in the appropriate quarter for federal reporting requirements. Local fiscal agents should submit this spreadsheet to OCS to accompany the Pool Reimbursement Request report.

Questions regarding adjustments to CSA expenditures may be directed to Chuck Savage, OCS Business Manager, by phone at (804) 662-9818 or by e-mail at [charles.savage@csa.virginia.gov](mailto:charles.savage@csa.virginia.gov).

Cc: William A. Hazel, Secretary of Health and Human Resources  
Martin D. Brown, Commissioner, Virginia Department of Social Services