

The Office of Comprehensive Services holds responsibility to provide consistent oversight for CSA administration and compliance with state policies and procedures (§2.2-2649). To that end, OCS program audits evaluate the effectiveness of internal controls, financial and operational organizational practices of locally administered CSA programs. The table below provides a summary of systemic, significant internal control weaknesses and non-compliance observations compiled from audit reports that have been recently issued. An internal control weakness refers to ineffective processes that may adversely impact the program's ability to achieve desired strategic, financial, operational, reporting, compliance, and stewardship objectives.** Non-compliance observations reference an organization's failure to fulfill specific requirements as stated in established laws, regulations, policies, and procedures. In support of OCS' efforts to continually improve the performance of CSA, this information has been furnished as a resource for the Community Policy and Management Teams to assess the local CSA program.

Summary of Non-Compliance Observations Audits Completed in Fiscal Year 2013-2014		
Audit Area	Statutory /Policy Criteria	Description
CPMT Administration	VDSS Foster Care Manual, Section 17: Funding Maintenance Costs 2011 Appropriations Act, Chapter 890, Item 274, § B.1.e.	CPMT policies and practices allow for the use of state pool funds for foster care specialized service payments that result in the duplication of enhanced maintenance payments. The CPMT has adopted criteria used to determine specialized service payments that are generally the same as the criteria used in the Virginia Enhanced Maintenance Assessment Tool (VEMAT), which is the authorized assessment instrument for determining enhanced maintenance amounts. NEW
	COV § 2.2-5200 § 2.2-5205; § 2.2-5207.	The local management structure does not meet the membership requirements established by CSA statute. A parent representative was not an active participant on FAPT.
	§ COV2.2-3100; § 2.2-3101; § 2.2-3117; § 2.2-5205; COV § 2.2-5207;	CPMT and FAPT members not representing a public agency did not complete Statement of Economic Interest Forms. In addition, verifications were not performed to ensure that team members representing public agencies that were required to file such forms complied with the requirement.
	COV § 2.2-5206 Items 4, 6, &13 CSA Manual 3.1.5 Duties and Responsibilities Toolkit Coordinated Long Range Planning	The CPMT has not documented a formal plan to substantiate coordination of long-range planning that includes an assessment of the current risks, strengths and needs of the existing program, as well as establishing and documenting measurable criteria for evaluating the effectiveness of the local CSA program.
	COV § 2.2-5206 , Item 17 CSA Manual 3.1.5 Duties and Responsibilities	Policies, procedures, and guidelines established by the CPMT are outdated and do not fully reflect current CSA operating practices.

Summary of Non-Compliance Observations Audits Completed in Fiscal Year 2013-2014		
Audit Area	Statutory /Policy Criteria	Description
Program Activities	Policies and Procedures for Access to CANVaS December 2010 Policies and Procedures for Access to CANVaS (updated November 2013) 	Former CANVaS User accounts are not always deactivated timely. In some instances, former users had been separated from CSA for greater than one year and their CANS accounts were still active. This compromises the security of the client confidential information. NEW
	COV § 2.2-5208 IFSP Model	Individual and Family Service Plans (IFSPs) are not developed using standard, minimum documentation criteria such as: (1) identification of short and long term goals, (2) time lines for period of service, (3) detailed information about the providers and costs of services, and (4) evidence of FAPT, case manager and parent collaboration.
	COV § 2.2-2648 D.15 COV § 2.2-5208 (5) 2011 Appropriations Act, Chapter 890, Item 274 § B. 3.	Documentation of utilization management and utilization review (UM/UR) practices, policies and procedures does not sufficiently evidence monitoring activities to assess the validity and effectiveness of the services purchased.
	COV § 2.2-5210; COV § 2.2-2648.D.13; COV § 2.2-2648 D.11. Tip Sheet #3-"How do I close a CANS assessment in CANVaS?"	Information security practices and procedures pertaining to CSA client have not been consistently applied to ensure that sensitive and confidential information maintained is adequately secured from unauthorized access and/or alteration. (1) Updated Consent to Exchange Information forms were not documented in CSA case files. (2) Child and Adolescent Needs and Strengths (CANS) Assessments documented in client case records indicated the status as "open". Open CANS data may be manipulated and/or incomplete, which may reduce the reliability, integrity and validity of the data.
Fiscal Activities	2011 Appropriations Act, Chapter 890, Item 274 § F.	Procedures have not been established for monitoring the collection of parental co-payments once assessed by the local CSA program. Further, sufficient measures are not taken to collect delinquent accounts. Examples include account receivable ledger, aging past due accounts, collection letters, etc. NEW
	COV § 2.2-5209 COV § 2.2-2648 D. 20	State pool funds were used for expenditures incurred for emergency services and/or placements that were not presented within 14 days of the placement, as required by the Comprehensive Services Act. Further, local programs are not voluntarily restoring the misappropriated funds immediately upon discovery of the discrepancy. NEW
	COV § 2.2-5206 (3); COV § 2.2-5208 (6)	Assessments and/or collections of parental co-payments were not documented to evidence parental ability to share financial responsibility for costs associated with services provided to eligible youth, including non-educational services provided to youth meeting the special education mandate criteria.

**Summary of Non-Compliance Observations
Audits Completed in Fiscal Year 2013-2014**

<p>Fiscal Activities</p>	<p>COV § 2.2-5209</p>	<p>CPMT approved policies that grant funding authorization of certain payments (excluding foster care maintenance and IEP services) that are not processed through FAPT, and/or delegates funding authorization to FAPT. The CSA code requires all services, except payments for foster care maintenance (at CPMT discretion), to be assessed by FAPT. Permitting FAPT to recommend and authorize the funding of services circumvents the segregation of duties inherent in the organizational structure of CSA where one body does not exercise sole discretion in recommending and approving funding of services.</p>
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Summary of Internal Control Weaknesses Audits Completed in Fiscal Year 2013-2014		
Audit Area	ARMICS Standard	Description
CPMT Administration	Control Environment: <ul style="list-style-type: none"> Oversight by the agency’s governing board Assignment of authority and responsibility. 	Regular participation/attendance by CPMT members could be improved. Often local CPMT bylaws establish parameters for required attendance by CPMT members. However, these requirements are not always enforced. The repeated absence of designated members may affect multidisciplinary planning to establish local requirements for access and use of CSA pool funds. NEW
	Control Environment: <ul style="list-style-type: none"> Workforce competence and human resource development. Control Activities: <ul style="list-style-type: none"> Education, Training, and Coaching 	Formal continuing education programs to orient new and existing local CSA stakeholders (government agencies, families, providers, community) have not been established to ensure that they are afforded awareness of the responsibilities of CPMT, State CSA requirements, local CSA policies and procedures, and performance outcomes of the program. NEW
	Control Environment: <ul style="list-style-type: none"> Management philosophy Oversight by the agency’s governing board Promotion of ethics and appropriate conduct Information & Communication: <ul style="list-style-type: none"> Internal Communication External Communication 	Opportunities exist to improve communication of the philosophy, ethics, goals, objectives, policies, procedures adopted and performance outcomes achieved by the local CSA Program. There is little indication of how this information is effectively communicated beyond the CPMT. The broader dissemination of information to all CSA stakeholders promotes consistency in awareness and understanding regarding accessibility to services. NEW
Program Activities	Control Activities over Automated Information Systems: <ul style="list-style-type: none"> Application Controls 	Open CANS assessments were maintained in the CANVaS system for an excessive period of time. The recommended guidelines suggest 60 days as the maximum at which those assessments should be completed or discarded. However, CANVaS reports reviewed in 2013 identified assessments that have been open since 2004. NEW
Fiscal Activities	Control Activities: <ul style="list-style-type: none"> Review and Approval Verification Reconciliation 	A formal reconciliation of CSA fund activity is not performed at least annually. A formal reconciliation requires reconciling the CSA financial data collected (Thomas Brothers, Harmony, Pool Reimbursement Reports, etc.) to the locality’s general ledger account balances. Reconciling items include allocations, expenditures, reimbursements, refunds, Medicaid adjustments, administrative expense, etc. NEW
	Monitoring: <ul style="list-style-type: none"> Ongoing monitoring 	The sliding fee scales developed by the local CSA program to determine parental contributions are not always updated periodically to ensure that they are representative of current economic conditions (i.e. changes in the federal poverty guidelines). NEW

** Click on the link [DOA ARMICS Standards.pdf](#) as an additional information resource for understanding internal controls.