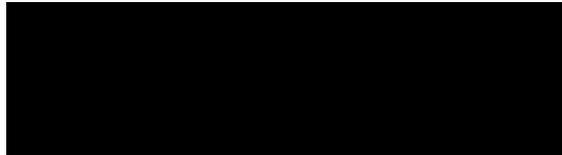




COMMONWEALTH of VIRGINIA

Susan Cumbia Clare, M.Ed
Executive Director

OFFICE OF COMPREHENSIVE SERVICES
Administering the Comprehensive Services Act for At-Risk Youth and Families
June 24, 2013



RE: [REDACTED] CSA Program Audit - Corrective Action Plan/Response

Dear [REDACTED],

In the final report issued December 20, 2012 pertaining to the financial/compliance audit conducted of [REDACTED] Comprehensive Services Act (CSA) program, the auditor reported that "the [REDACTED] approved \$13,211.50 in funding for services related to an emergency placement and the case was not heard by the Family Assessment and Planning Team (FAPT) within the required 14 day time period" as required by COV § 2.2-5209. The audit recommended reimbursement of the state share of the CSA pool funds expended for this placement.

In your formal response and the subsequently submitted corrective plan, you objected to the auditor's recommendation stating "it is our position that a failure by FAPT to approve an emergency placement within 14 days should not result in local responsibility for 100% of the cost of that service for the entire period of that service, including that time which occurs after the FAPT approval. Given that FAPT can approve emergency placements up to 14 days after the placement occurs, it is our position that only 13 days of the emergency placement expenditures were made without full approval. The amount of CSA expenditures made to cover those 13 days was [REDACTED]. The local share of this amount would be [REDACTED] and the state share would be \$1724.91."

I respectfully acknowledge your concerns regarding local responsibility for 100% of the cost associated with the placement. I have considered the following in my review of the audit recommendation and your response:

1. CSA Code Section 2.2-5209 states, "Nothing in this section shall prohibit the use of state pool funds for emergency placements, **provided the youth are subsequently assessed by the family assessment and planning team or an approved collaborative, multidisciplinary team process within 14 days** of admission and the emergency placement is approved at the time of placement (emphasis added)." The statute provides for 14 days of "grace period" only when the condition of the FAPT review within 14 days is met.

2. State reimbursement for services included in an Individual Family Services Plan developed by the family assessment and planning team is appropriate when all CSA requirements are met. Once the FAPT meeting was held and all other CSA requirements were met, reimbursement of the state's share of costs is appropriate.
3. Failure to assess the case within 14 days precluded timely submission of the Certificate of Need required to access Medicaid funding for the placement and resulted in charges to the Pool Fund that would have otherwise been funded by Medicaid. The delay likely contributed also to untimely completion of the CANS assessment.

Based on the above, it is my conclusion that the use of Pool Funds was not appropriate for this placement for the period between the date of placement and the date of FAPT review and approval. Given the use of Title IV-E and Medicaid funds for portions of the placement, the total Pool Fund cost of the placement was \$██████████. The state's share of this cost was \$1,943.51. OCS will execute the recovery of state funds in the amount of \$1,943.51 through a reduction to a June 2013 Pool Fund Reimbursement Request.

OCS requests that the ██████████ CPMT submit an amended corrective action/program improvement plan which addresses procedures to ensure compliance with requirements for timely FAPT review of emergency placements. The amended plan is requested no later than July 19, 2013.

The denial by the Office of Comprehensive Services of financial reimbursement is an issue than can be appealed through the CSA Dispute Resolution Process. This process is described in the CSA Policy Manual, Section 3.4 which may be found at the following web address: http://www.csa.virginia.gov/html/csa_manual_dev/stage.cfm?page=34.cfm

Please accept my appreciation for the cooperation of ██████████ staff during and subsequent to the audit. Feel free to call me should you have any questions.

Sincerely,



Susan C. Clare, Executive Director
Office of Comprehensive Services

Cc ██████████