



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

February 11, 2014

Ms Terri Crews, CPMT Chair
Franklin County CSA Program
30 Technology Dr.
Rocky Mount, VA 24151

Dear Ms. Crews

In accordance with the Office of Comprehensive Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Franklin 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 March 31, 2013. An on-site visit was scheduled and conducted by OCS Program Auditors on October 24, 2013 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 Franklin County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Franklin County CPMT. We agree that significant observations of non-compliance were found in the design or operation of the processes or services conducted on behalf of Franklin County CSA. However, we do not agree that all non-compliance observations were address in the corrective action plan provided by Franklin County CPMT. The explanation for our assessment results are as follows:

The Franklin County Policy and Management Team concluded that there were significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook indicated that there were other significant internal control weaknesses in the local CSA program that were not identified by the locality. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affecting CSA funded activities, as well as monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organization's internal control structure are considered significant. Specifics pertaining to the Franklin County CSA Program are detailed on pages 2-3.

SIGNIFICANT INTERNAL CONTROL WEAKNESSES	
■	Article I Section 4 of Franklin County policy and procedures manual provides for blanket authorization of funding for foster care miscellaneous needs that do not exceed \$100 without CPMT approval. All expenditures accessing the pool fund require CPMT's approval. In addition all services are required to go before FAPT with the exception of maintenance and IEP approved services. The application of this local policy circumvents State CSA policy.
■	Franklin County CPMT does not have a policy in place indentifying the frequency of local policy reviews to ensure they are current and align with current CSA policies and statutes.
■	Recommendation: Franklin County CPMT should strongly consider rescinding the existing local policies, and revise the local policies to ensure that they are more closely aligned with CSA policies established by the Code of Virginia and the State Executive Council. In addition, the CPMT should adopted a policy that will address the frequency in reviewing current policies.
■	Documentation of service planning activities requires strengthening to ensure compliance with local policies and program requirements. Six case files were examined to confirm that required documentation was maintained in support of and validate FAPT referrals and CPMT funding approval. Individual and family service plans (IFSPs) were not always developed according to the Code of Virginia and local policy requirement. Franklin County CSA Policy states IFSPs should contain short term and long term goals or objectives for the child and family and time lines for accomplishing the stated goals and objectives. Three clients IFSPs did not contain measurable long and short term goals and objectives.
■	Recommendation: The Franklin County CPMT should ensure that all required elements of the IFSP are properly documented and updated to support recommended services. Short and long-term goals and objectives should be measurable with stated timeframes for achieving stated goals.
■	Franklin County CPMT does not have written policies and procedures regarding Utilization Management nor are they reviewing and analyzing data in management reports provided by the Office of Comprehensive Services to assist them in evaluating child and family outcomes and public and private provider's performance in the provision of services to children and families through the CSA program.
■	Recommendation: Franklin County CPMT should adopt policies and procedures on Utilization Management and identify performance criteria it would like to monitor and analyze for its community.
■	One emergency placement was not presented to the Family Assessment and Planning Team (FAPT) within 14 days of the admission as required by Code of Virginia Section § 2.2-5209. referrals to family assessment and planning teams. As a result, use of CSA pool funds was not appropriate. The total CSA costs (state and local share) incurred for this placement prior to the FAPT meeting was \$2,850.
■	Recommendation: Franklin County CPMT should ensure adherence to CSA Statues regarding emergency placement, and considered holding an emergency FAPT meeting when a child's placement changes due to court orders. The CPMT should consult with OCS on the appropriate action to be taken where CSA pool funds were not appropriately expended.

■	Franklin County CPMT acknowledges partial compliance in regards to parental payment assessments, however: did not provide a corrective action plan to addresses the deficiency.
■	Recommendation- Franklin County CPMT should complete a corrective action plan to ensure full compliance with state statutes regarding parental assessments.
■	<p>Information security practices and procedures pertaining to CSA client records and data have not been consistently applied to ensure that sensitive and confidential information maintained is adequately secured from unauthorized access and/or alteration. Instances of inadequacies in data security that were not identified by the Franklin County CPMT are noted as follows:</p> <ul style="list-style-type: none"> • During a physical inspection of records storage, audit staff observed that files were stored in unlocked cabinets in an area easily accessible to non-CSA staff during and after normal work hours. Files could be removed and/or altered without appropriate authorization and the absence of the file could go undetected for an indeterminate period. • Four Child and Adolescent Needs and Strengths (CANS) Assessments documented in CANVaS indicated the status as “open” greater than sixty days. Open CANS data can be manipulated and/or incomplete, which may reduce the reliability, integrity and validity of the data. • Six instances were identified where access to the CANVaS system was not deactivated when changes in employees’ job responsibilities or separation from agency had occurred. Per the policies and procedures for access to CANVaS when an employee leaves his/her position, supervisors must contact the Help Desk directly or the Designated Super User/Report Administrator for the locality to deactivate a user’s account. Leaving accounts open could potentially jeopardize the confidentiality of the information that has been entered. • One case manager was identified whose CANS certification has expired. The policies and procedures for access to CANVaS states that certification on the use of CANS must be renewed annually. The CANVaS system is designed so that users whose CANS certification has expired will not be permitted to complete an assessment. In addition, the system provides users with 90, 60 and 30 day notification prior to the expiration of users’ certification.
■	<p>Recommendation: The Franklin County CPMT should ensure that CSA case files are properly secured from unauthorized individuals by securing them in locked file cabinets or offices with locked doors. In addition the CPMT should ensure that all CANS assessments are closed within a 60 day time frame. The CPMT should assign the CSA coordinator or designee to review the open assessment 60 days report in CANVaS to ensure all assessments are properly closed. In addition, assign someone to monitor individuals with access to CANVaS to ensure security requirements are met, active and inactive users are identified, and accounts are removed in a timely manner and that users’ certification are current by using the Locality Staff Certification Expiration List Report in the CANVaS.</p>

The Office of Comprehensive Services respectfully requests that you submit a corrective action plan to address the observations outlined on pages 2 -3 no later than 30 days from receipt of this report. You may use the template included in the CSA Self-Assessment Workbook. The workbook may be accessed via:

http://www.csa.virginia.gov/html/Program_Audit/Program_Audits_information.cfm.

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We would like to thank the Franklin County Community Policy and Management Team 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 Greg Wringe, CSA Coordinator during our on-site visit. Mr. Wringe's efforts enabled our team to quickly, and in some cases immediately, resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin, MBA
Program Auditor

cc: Susan C. Clare, Executive Director
Richard E. Huff II, County Administrator
Vincent Copenhagen, CPMT Fiscal Agent
Finance Director, Franklin County
Greg Wringe, CSA Coordinator