



# COMMONWEALTH of VIRGINIA

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

SCOTT REINER, M.S.  
Executive Director

July 26, 2016

Jeffrey Homan, CPMT Chair  
31st Court Services Unit  
9540 Center Street  
Manassas, VA 20110

RE: City of Manassas CSA Program Self-Assessment Validation, File No. 27-2015

Dear Mr. Homan,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2013-2015, the City of Manassas Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program by the established due date of December 31, 2014. An on-site visit was scheduled and conducted by OCS Program Auditors on March 30, 2016 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 City of Manassas CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

with the conclusion reported by the City of Manassas CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of the City of Manassas CSA program. The explanation for our assessment results are as follows:

***The City of Manassas Community Policy and Management Team concluded that there were no significant non-compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified major deficiencies<sup>1</sup> indicating non-compliance and internal control weaknesses in the local CSA program. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the***

---

<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.

*Commonwealth. 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 City of Manassas CSA Program are detailed below.*

<b>SIGNIFICANT NON-COMPLIANCE AND INTERNAL CONTROL WEAKNESSES</b>	
<p>Internal controls established by CSA statutes and local policy were not effectively implemented by the CPMT in order to safeguard against conflicts of interest pertaining to the referral of services and approval of access to CSA pool funds by eligible youth and their families. Non-public members serving on the CPMT and FAPT did not complete the Statement of Economic Interest (SOEI) form as required by statute. Exceptions were noted as follows:</p> <ul style="list-style-type: none"> <li>• Manassas CSA requires only the private providers serving on the CPMT and the Family Assessment and Planning Team (FAPT) to complete SOEI disclosures once during the year of appointment. However, and in lieu of the appropriate required form, an internally developed form is completed upon appointment. Annual updates have not been completed as required in statute.</li> <li>• Parent representatives were not required to disclose their economic interest per local practices.</li> </ul> <p>The Code of Virginia requires an annual disclosure of economic interest for non-public members serving on the CPMT and FAPT. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds may have been significantly reduced since the required parties did not appropriately disclosed personal interests.</p>	
<p><b>CRITERIA:</b> COV Sections: <u>§ 2.2-3100</u>; <u>§ 2.2-3101</u>; <u>§ 2.2-3115</u>; <u>§ 2.2-3117</u>; <u>§ 2.2-5205</u>; <u>§ 2.2-5206</u>; <u>§ 2.2-5207</u>; DOA Agency Risk Management and Internal Control Standards, Control Activities</p>	
<b>RECOMMENDATION:</b>	<p>The CPMT for the City of Manassas should ensure that the SOEI form is completed in accordance with the Code of Virginia immediately for all non-public participating members serving on the CPMT and the FAPT.</p>
<b>CLIENT COMMENT:</b>	<p>See Appendix attached for CPMT response</p>

**SIGNIFICANT NON-COMPLIANCE AND INTERNAL CONTROL WEAKNESSES**

Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Four (4) of twenty-two (22) case files (18%) reviewed by the City of Manassas CSA office were examined to confirm that required documentation was maintained in support of and to validate FAPT and/or multi-disciplinary team (MDT) referral, and CPMT funding decisions. The results of the examination, identified opportunities for improvements. Three (3) of the four (4) client case files reviewed omitted documentation to demonstrate compliance with CSA requirements key to the coordination and service planning by FAPT. Data omitted from case files reviewed were consent to exchange information (2 cases), family and child strengths (3 cases), and discharge Child and Adolescent Needs and Strengths assessments (CANS) (1 case).

Insufficient data collection and poor document management in service planning may affect efficiency and effectiveness of the local program. Further, this condition fosters an environment that makes the program more susceptible to potential loss of accessibility to State funding in support of local programs as a result of non-compliance with CSA statutes regarding service planning and access to pool funds.

**CRITERIA:** COV § 2.2-5208; CSA Manual section 3.6 Mandatory Uniform Assessment Instrument (Adopted December 18, 2007, Updated May 12, 2008); § 2.2-5210. Information sharing; confidentiality; Local Policy VII D.3 and XI.A

<b>RECOMMENDATION:</b>	<ul style="list-style-type: none"> <li>• The CPMT should ensure that all required documentation is maintained in client case files.</li> <li>• The CPMT should ensure that the required data elements to evident service planning are included on the Individual Family Service Plan.</li> <li>• CANS assessments (initial, re-assessment and discharge) should be completed in CANVaS and maintained in client records in accordance with City of Manassas Utilization Review Policy.</li> </ul>
------------------------	---

<b>CLIENT COMMENT:</b>	See Appendix attached for CPMT response
------------------------	---

The Office of Children’s Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

Jeffrey Homan, CPMT Chair  
City of Manassas CSA Program Self-Assessment Validation  
July 26, 2016  
Page 4

We would like to thank the City of Manassas 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 Sharon Minter, CSA Coordinator during our on-site visit. Ms. Minter'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,

  
Annette E. Larkin  
Program Auditor

cc: Scott Reiner, Executive Director  
William Patrick Pate, City Manager  
Dr. Rebecca Stone, Former CPMT Chair  
LaTanya Bell, Fiscal Agent  
Sharon Minter, CSA Coordinator  
Stephanie Bacote, Program Audit Manager  
SEC Finance and Audit Committee

Enclosure: Appendix City of Manassas CPMT Response

# The Children's Services Act in Manassas

Lauren Nutt, Chair  
Family Assessment & Services Team

9324 West Street, Manassas, VA 20110  
Phone (703) 361-8277 x2333  
Fax (703) 361-9506

Jeffrey Homan, Chair  
Community Policy & Mgmt Team

---

July 25, 2016

Ms. Annette E. Larkin  
Program Auditor  
Office of Children's Services  
1604 Santa Rosa Rd., Suite 137  
Richmond, VA 23229

Dear Ms. Larkin:

Thank you for your visit to our CSA office on March 30, 2016 to perform the independent validation of our local CSA program's self-assessment. The members of the Manassas City CPMT have been apprised of your observations.

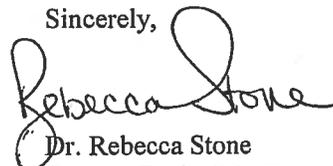
As per our exit discussion and your follow-up report of July 18, 2016, we note the following areas that must be addressed in order to bring our CSA program into full compliance:

1. Completion of the official Statement of Economic Interest document by all non-public members of our CPMT and FAST on an annual basis.
2. Strengthened documentation in the CSA case files to include:
  - a. incorporation of comprehensive Utilization Management & Review principles in the coordination and development of service plans for each CSA case and documented evidence of such;
  - b. signed and dated Consent to Exchange Information forms for foster care clients in addition to all others currently required and
  - c. Completion of a Discharge CANS assessment at each case closure.

We have already begun to address the above-stated deficiencies to be in effect as of July 1, 2016. A quality improvement plan detailing our actions in this regard will be submitted to OCS within the stated time period as per your request.

The Manassas City CPMT appreciates your assistance in identifying these areas of weakness that must be strengthened in order to improve the quality of our CSA program and its service delivery to our community. We welcome the opportunity to effectively collaborate with the state Office of Children's Services in this regard.

Sincerely,



Dr. Rebecca Stone  
Former Chair, CPMT

Cc: J. Homan, Chair  
S. Minter, CSA Coordinator