

***CHILDREN'S SERVICES ACT  
PROGRAM AUDIT***

***Accomack/Northampton Counties-  
Eastern Shore  
Self-Assessment Validation***

***Audit Report No. 33-2022***

**September 28, 2022**



**Office of Children's Services**  
Empowering communities to serve youth



# COMMONWEALTH of VIRGINIA

Scott Reizer, A.S.  
Executive Director

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

September 28, 2022

Vicki Weakley, CPMT Chair  
Eastern Shore CSA Program  
P. O. Box 210  
Accomack, Virginia 23301

RE: Eastern Shore CSA Program Self-Assessment Validation  
Final Report, File No. 33-2022

Dear Ms. Weakley:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year (FY) 2022, the Eastern Shore Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of the local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Eastern Shore CSA program completed January 28, 2022 and covering the period January 1, 2021 through December 31, 2021, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

with the conclusion reported by the Eastern Shore 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 Eastern Shore CSA Program. The explanations for our assessment results are as follows:

***The Eastern Shore CPMT concluded that there were no significant compliance and/or internal control weakness observations noted. A summary of non-compliance and/or internal control weaknesses reported by the CPMT is included as an attachment to this report. However, validation procedures identified significant deficiencies not originally reported by the CPMT. 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 Eastern Shore CSA Program are detailed on pages 2 through 3.***

### SIGNIFICANT INTERNAL CONTROL WEAKNESSES

1. Eastern Shore CPMT has documented a formal local policy manual (last revised 01/2022) to govern the local CSA program. However, the existing policies and procedures are not consistent with established state CSA requirements to govern local CSA programs. A review of the Eastern Shore CSA Policy Manual noted the following opportunities for improvement/clarification:
  - A) Parent Self-Referrals. The existing policy manual does not include language establishing policies and procedures for parent self-referrals to ensure accessibility to CSA services and funding as required by COV [2.2-5206](#) item 5.
  - B) Family Assessment and Planning Team (FAPT) Referral Exemptions. The current policy exempts Family Partnership Facilitation/Services and Title IV-E eligible Fostering Futures cases from the FAPT referral and assessment process. The only exemptions permitted by COV [2.2-5209](#) are Foster Care Maintenance only expenses. The policy does not clarify that the exemption for Fostering Futures cases is limited to maintenance. Services beyond maintenance (i.e., family partnership facilitation) funded by the state pool should be reviewed/assessed by FAPT or an approved collaborative, Multi-Disciplinary Team (MDT) process.
  - C) Parental Contribution Assessments. Differing sections of the policy manual directs parental contribution assessments to be completed by the case manager, FAPT, and/or CSA Program Administrator. The policy lacks clarity regarding responsible parties accountable for carrying out the function and thereby ensuring compliance with COV [2.2-5208](#), Item 6 of the statute includes the assessments of parental financial contribution among the duties and responsibilities of the FAPT.
  - D) Utilization Review Section 6 (Frequency of CANS Administration). For utilization review purposes, local policy directs that the Child and Adolescent Needs and Strengths (CANS) assessment for basic Foster Care Maintenance cases (including day care) is to be completed at the discretion of the local CSA program. This practice is contrary to CSA Policy 3.6.5.D Frequency of CANS Administration that states, "The CANS assessment is required annually."

CRITERIA: Department of Accounts (DOA) Agency Risk Management and Internal Control Standards (ARMICS), Control Environment

**SIGNIFICANT INTERNAL CONTROL WEAKNESSES CONTINUED**

2. Expenditure reporting errors were identified in four (4) out of the ten (10) (40%) client records examined. The service name description was not appropriately referenced indicating the service that was actually funded. This detail is provided in data reports used to support continuous quality improvement monitoring efforts, which are dependent upon complete, accurate, and reliable information. The errors lessen the reliability and integrity of data compiled in CSA utilization reports.

**Table A- Financial Reporting Errors – Service Name Description  
 CSA Policy 4.5 Fiscal Procedures**

Locality	Client	Incorrect Services Name Code	Correct Service Name Code	Period
Accomack	A	#10 Individual Support Services	#27 Support, Supervision, and Administration	01/2021 – 10/2021
Accomack	B	#10 Individual Support Services	#27 Support, Supervision, and Administration	10/2020 – 12/2020 **
Accomack	C	#2 Applied Behavioral Analysis	#28 Private Residential School	03/2021 – 06/2021
		#26 Private Day School	#28 Private Residential School	07/2021 – 08/2021
		#29 Residential Education	#28 Private Residential School	08/2021 – 11/2021
		#30 Residential Room & Board	#28 Private Residential School	01/2021 – 08/2021
		#36 Special Education Related Services	#28 Private Residential School	01/2021 – 06/2021
Northampton	D	#41 TFC Case Management	#27 Support, Supervision, and Administration	09/2021 – 12/2021

\*\* Payment for the service period was processed in January and February 2021, during the period of review.

CRITERIA: DOA ARMICS, Control Activities

**RECOMMENDATIONS**

1. The CSA Office and Fiscal Agent should establish quality assurance and accountability procedures to ensure financial transactions are accurately reported in the appropriate expenditure and service name categories, and the correct unit price and match rates are applied. Errors in current fiscal year reporting should be immediately corrected.
2. The CPMT should review and revise the local CPMT Policy/Procedure Manual to ensure alignment with current CSA statutes and policies adopted by the State Executive Council for Children’s Services (SEC). The CPMT should adopt a policy that will address the frequency of review of current policies.

**CLIENT COMMENT**


1. “CPMT concurs with the findings and will implement a reconciliation process to assist with quality assurance and accountability procedures to ensure financial transactions are accurately reported and the appropriate expenditure and service name categories are correct.
2. CPMT will update its policy and procedures for parent self-referrals, family assessment and planning team referral exemptions, parental contribution assessments and utilization review section six pertaining to the frequency of CANS administration.
3. CPMT concurs with the findings and will revise its local CSA Policy/Procedure Manual to ensure alignment with current CSA statutes and policies adopted by the State Executive Council for Children’s Services.”

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 thirty (30) days from receipt of this report. In addition, we respectfully ask that you notify this office as quality improvement tasks identified to address significant observations are completed. OCS will conduct a follow-up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Eastern Shore CPMT and CSA staff and partners 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 Rudy Zavala, CSA Coordinator, and CSA staff during our review. Mr. Zavala's efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,

  
Rendell R. Briggs, CAMS  
Program Auditor

  
Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Michael Mason, Accomack County Administrator  
Charles Kolakowski, Northampton County Administrator  
Amy Ford, CPMT Fiscal Agent  
Rudy Zavala, CSA Coordinator

Attachment



CSA Self-Assessment Validation  
Accomack/Northampton County CSA Program Audit- SAV  
Summary of Self-Reported Non-Compliance and/or (Non-significant) Internal Control Weakness

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/ Status
<p><b><u>Section I, Governance, Page 3, Item #5-Organizational Structure:</u></b> The Accomack County Board of Supervisors appointed a Local Government official in May 2022. This position is now filled.</p>	COV 2.2-5205; ARMICS <sup>2</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	05/02/22 Completed
<p><b><u>Section II Risk Management Worksheet, Page 19, Item #2 and #4-Risk Assessment:</u></b> The completion of the Risk Assessment Worksheet (3) has been completed. All documentation was emailed to the AIC on 01/31/22. The ES CPMT uses a multi-step, multi-department system of checks and balances to prevent any fraudulent activity.</p>	ARMICS <sup>1,3,4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	01/31/22 Completed
<p><b><u>Section III Internal Control Worksheet, Page 25, Item #3-Communication:</u></b> CSA expenditures may have been coded incorrectly. CPMT has established a multi-level process that includes education and training for staff and has established a process where all POSO are initiated centrally.</p>	ARMICS <sup>2,3,4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/01/21 Completed
<p><b><u>Section III Internal Control Worksheet, Page 27, Item #6-Fund Balance Reconciliation:</u></b> The ES CPMT will develop a formal process to reconcile CSA reported fund balances with the general ledger account balances of the Accomack County Finance Department. This process will be followed when CSA funding balances are reported to the CPMT.</p>	ARMICS <sup>4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10/01/22 In-Process
<p><b><u>Section III Internal Control Worksheet, Page 28, Item #15-Operational Oversight:</u></b> The ES CPMT has established a quality assurance process to report substantial changes in the local CSA program.</p>	ARMICS <sup>2,3,4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/09/22 Completed
<p><b><u>Section V, Compliance, Page 37, Item #7-Bid Process:</u></b> The EST CPMT currently does not have a BID process. However, the ES CPMT is responsible for ensuring that all services and programs are solicited/contracted for in accordance with established County and State procurement requirements.</p>	ARMICS <sup>2,3</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/27/22 Completed

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/ Status
<p><b><u>Section V, Compliance, Page 39, Item 21a-c MDT Process:</u></b> The ES CPMT does not feel the need for a Multi-Disciplinary Team. The ES CPMT will update its local policy manual in order to reflect that the CPMT does not utilize an MDT.</p>	ARMICS <sup>2,3</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10/01/22 In-Process
<p><b><u>Section V, Compliance: Page 47, Item #6-CANS Assessments:</u></b> Some CANS are not being completed in the appropriate timeframe. CPMT has established processes and reviews to analyze these areas, which include training, monitoring of CANS via CANVaS system and only evaluations.</p>	ARMICS <sup>2,3,4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	05/01/22 Completed

ARMICS (Department of Accounts, Agency Risk Management and Internal Control Standards):

- <sup>1</sup>Control Activities: Competence, Documentation,
- <sup>2</sup>Control Environment: Governance, Policies and Procedures
- <sup>3</sup>Monitoring: Program Evaluation
- <sup>4</sup>Communication