



Office of Children's Services
Empowering communities to serve youth

Audit Process Overview

and

Preparation Resource Tools

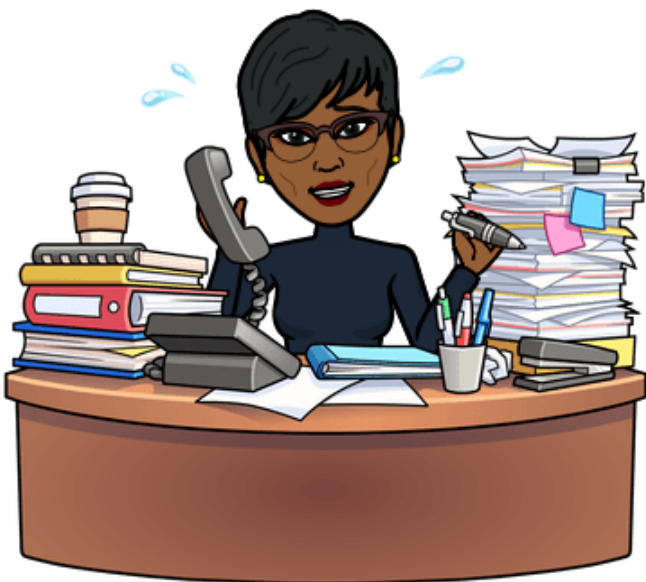
Presented By:
Stephanie Bacote, Audit Manager
Annette Larkin, Program Auditor



Meet the Team



The Real A-Team



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The Real A-Team



Rendell Briggs
Program Auditor
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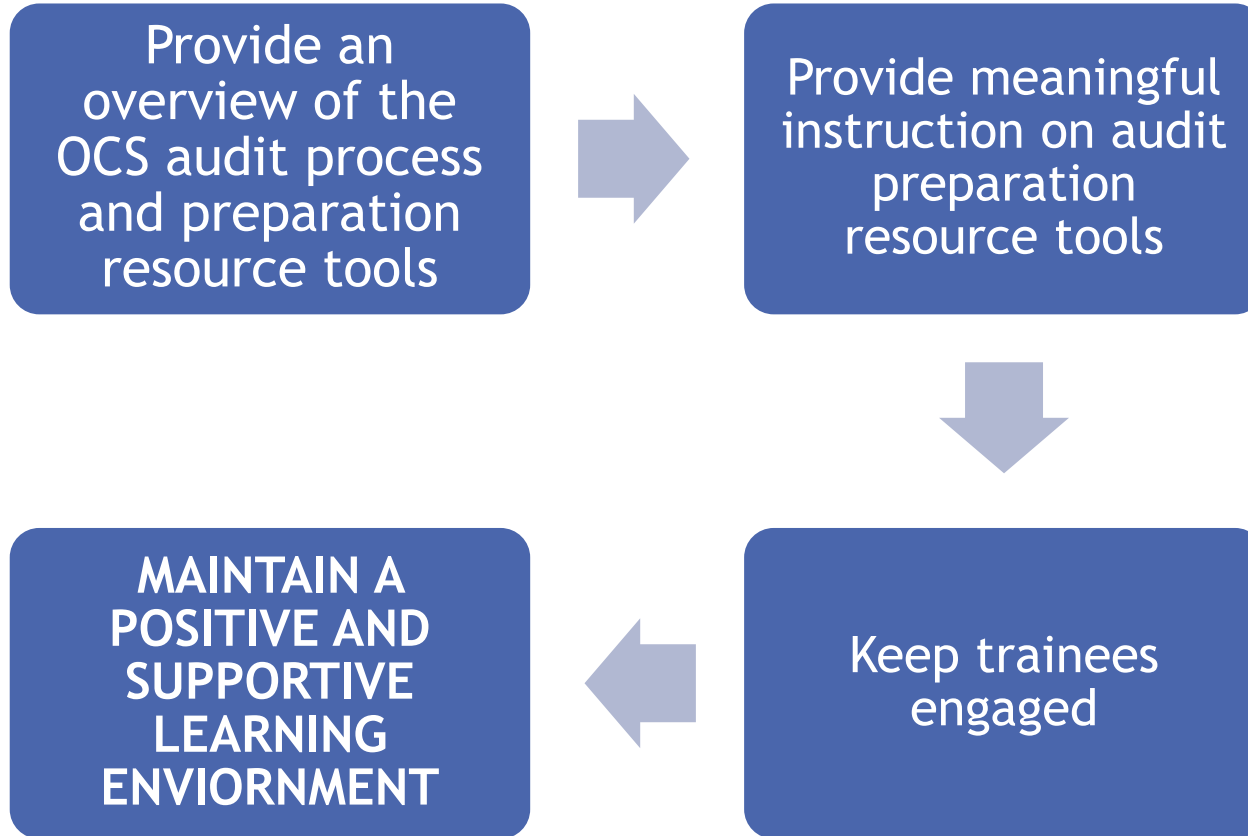
The Real A-Team



Stephanie Bacote
Audit Manager
Stephanie.Bacote@CSA.Virginia.Gov

TRAINING OBJECTIVES

Presenter's Objectives:



TRAINING OBJECTIVES

Trainees' Objectives:

Understand the
process
(traditional and
remote audits)



Discover
techniques and
tools to promote
audit preparation



HAVE FUN
!!!!!!



Remain engaged
and actively
participate
throughout the
session

SESSION AGENDA



**OVERVIEW: RULES
OF ENGAGEMENT**



**AUDIT PREPARATION
RESOURCES**



HIGHLIGHTS



**PARTICIPANT
ENGAGEMENT**

Room Survey

Raise Your Hand If.....

- ▶ You participated in an audit
- ▶ Led by auditors from local government or a privately contracted entity (i.e. public accounting firm)
- ▶ CSA Program Audit



Audit Overview: Rules of Engagement

Benefits of program evaluation and quality improvement activities:

- ▶ **Ensure program compliance**
- ▶ **Monitor achievement of goals/objectives**
- ▶ **Assess program effectiveness**

Rules of Engagement

▶ Notifications

- Audit plan published on CSA website (updated annually)
- Courtesy telephone call
- Official Engagement Letter

▶ Preparations

- Entrance Conference (in-person or virtual)
- Requests for information

▶ Reporting Results

- Preliminary observations (verbal and/or written)
- Exit Conference (in-person or virtual)
- Final Report (published on CSA website)

▶ Audit Follow-up

- Quality Improvement Plan (QIP)
- Administrative Referral Action
- QIP Updates

Documentation Submission Timelines

- **Initial Request for Documentation**
 - No later than **2 WEEKS** from date written request is received

- **Additional/Follow-up Request**
 - No later than **2 WEEKS** from date written request is received

Where the due date for submission has passed, there will be no subsequent request to provide documentation. Audits will proceed accordingly.

Documentation Submission Timelines

- **Client Comments for the Final Audit Report**
 - ❑ **2 WEEKS** after the exit conference is conducted
or
 - ❑ No later than **1 WEEK following the first CPMT meeting that occurs after the exit conference**
 - ❑ Options to be discussed and agreed upon by all parties during the exit conference and confirmed via email.

Where the due date for submission has passed, there will be no subsequent request to provide documentation. Audits will proceed accordingly.

Documentation Submission Timelines

- **Quality Improvement Plans (QIPs)**

After receipt of final audit report as follows:

- ❑ **30 CALENDAR DAYS** for Self-Assessment Validations
- ❑ **45 CALENDAR DAYS** for Onsite Engagements

Where the due date for submission has passed, the auditor will make a referral to OCS senior management for administrative action.



Stress Break Fun Trivia



3 Lifelines

- 50/50- where at least 2 answers will be eliminated.
- Ask the audience- where you can poll everyone in the classroom.
- Phone a friend- where you can choose one person in the room for assistance..



The background of the slide is a futuristic, blue-lit interior. It features a large, circular platform in the foreground with a glowing blue orb in the center. The platform is surrounded by a railing and has several beams of light extending from the center. In the background, there are two sets of stairs leading up to a platform with a glowing blue orb. The overall atmosphere is high-tech and mysterious.

**Which is the only edible food
that never goes bad?**

A. Dark Chocolate

B. Dried Pasta

C. Honey

D. None of the above





**Which is the only edible food
that never goes bad?**

A. Dark Chocolate

B. Dried Pasta

C. Honey

D. None of the above



Remote Auditing Process:

Fieldwork	General Audit Procedures	Audit staff will objectively evaluate alternate procedures adopted locally to ensure continuity and access to services and funding impacted by COVID-19							
	Client Case Reviews	<p>Localities will be asked to scan (paper to .pdf) a select number of files for audit examination that will be transmitted to the auditor securely (password protected/encrypted).</p> <ul style="list-style-type: none"> The auditor will select a limited number of client records with transaction history during the most recent 12 month period from when the audit is initiated (e.g. September 19 – August 20). The number of records requested is based on the client population of the locality as indicated by CSA utilization reports maintained by OCS. <table border="1" data-bbox="884 782 1543 996" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Population</th> <th># of Files Requested</th> </tr> </thead> <tbody> <tr> <td>1 to 50</td> <td>5 cases</td> </tr> <tr> <td>51 to 500</td> <td>10 cases</td> </tr> <tr> <td>> 501</td> <td>15 cases</td> </tr> </tbody> </table> <ul style="list-style-type: none"> The auditor will provide the CSA Coordinator with a standardized document request form (Attachment 2-Sample) identifying the cases selected for review and the specific documents from each file to be securely transmitted to the auditor. This will ensure that efforts focus on specific documents rather than the full client record. The form also serves as a checklist for the auditor and the local CSA office to record documents submitted for review or provide justification for the absence of the requested information. 	Population	# of Files Requested	1 to 50	5 cases	51 to 500	10 cases	> 501
Population	# of Files Requested								
1 to 50	5 cases								
51 to 500	10 cases								
> 501	15 cases								

Document
Request List
Client Record
Review

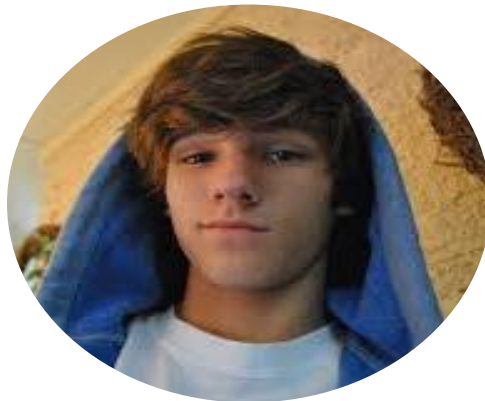


MANDATE TYPE: SPECIAL EDUCATION SERVICES IN AN APPROVED EDUCATIONAL PLACEMENT
(Expenditure Category 2g Special Education Private Day Placement)

PART I:	Selected Clients:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		Case No.	Case No.	Case No.	Case No.	Case No.	Case No.	Case No.	Case No.	Case No.	Case No.	
	Documents Requested											
	Check Box <i>if Submitted</i>	Document Description					Auditor/Client Comments:					
	<input type="checkbox"/>	Proof of mandate eligibility <i>(Local form)</i>										
	<input type="checkbox"/>	IEP					For the period covering:					
	<input type="checkbox"/>	FAPT Notes (where applicable)					For the period covering					
	<input type="checkbox"/>	Utilization Reviews										
	<input type="checkbox"/>	Consent to Exchange Info					For the period covering					
	<input type="checkbox"/>	Provider placement agreement or rate sheet (for private day placements and a residential placements)										
	<input type="checkbox"/>	Treatment Plans/Progress Reports										
	<input type="checkbox"/>	Proof of CPMT Funding Approval										
<input type="checkbox"/>	Purchase Orders											
<input type="checkbox"/>	Vendor Invoices											

PART II:	Exceptions	
	Selected Clients:	Explanation/Description:
	Case No.	
	Case No.	
	Case No.	
	Case No.	
	Case No.	
	Case No.	
	Case No.	
	Case No.	
PART III:	Certification	
	Name (Print)	Date:
	Signature	Date:

PARTICIPANT ENGAGEMENT



Meet Johnnie Appleseed

- ▶ FC A/N-LDSS
Entrustment
Custody
- ▶ SPED

MANDATE TYPE: FOSTER CARE ABUSE/NEGLECT – LDSS ENTRUSTMENT / CUSTODY

(Expenditure Categories 1a,1b,1e, 2a, 2a1, 2c, 2e, 2f,2f1, or 2i Foster Care IV-E or all other children licensed residential congregate care, congregate education , treatment foster care federal and state , state and federal community based services, foster care maintenance and other services , community based services ,transitional community based services from residential to community ,or Psychiatric Hospital /Crisis stabilization units)

PART I:	Selected Clients:	<input checked="" type="checkbox"/> Case No. 111	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	
	Documents Requested											
	Check Box if Submitted	Document Description					Auditor/Client Comments:					
	<input type="checkbox"/>	Proof of mandate eligibility (Local form)										
	<input checked="" type="checkbox"/>	IFSP/Other Service Plan <i>(Other service plans include Foster Care Plan, Family Partnership Meeting Plans, Multi-Disciplinary Team Plans)</i>					For the period covering: 5/1/20 – 4/30/21					
	<input checked="" type="checkbox"/>	FAPT Notes (where applicable)					For the period covering: 5/1/20 – 4/30/21					
	<input checked="" type="checkbox"/>	Utilization Reviews					Last UR performed during the review period					
	<input checked="" type="checkbox"/>	Consent to Exchange Info					For the period covering: 5/1/20 – 4/30/21					
	<input checked="" type="checkbox"/>	Title IV-E Determination Form					For the period covering: 5/1/20 – 4/30/21					
	<input type="checkbox"/>	Approved Foster Care Home Certificate (if in a local home)										
<input type="checkbox"/>	Fostering Futures Agreement (where applicable)											
<input checked="" type="checkbox"/>	Provider placement agreement or rate sheet (if placed through a child placing agency or in a residential placement)					Grafton and Braley & Thompson						
<input checked="" type="checkbox"/>	VEMAT (if receiving enhance maintenance payments)					For the period covering: 5/1/20 – 4/30/21						

	<input type="checkbox"/>	CBBHS assessment signed by a Licensed Mental Health Profession <i>(if client does not have Medicaid)</i>	
	<input checked="" type="checkbox"/>	Treatment Plans/Progress Reports	<u>Braley & Thompson</u> and Grafton
	<input checked="" type="checkbox"/>	Proof of CPMT Funding Approval	To coincide with the selected expenditures on the LEDRS payment history
	<input checked="" type="checkbox"/>	Purchase Orders	To coincide with the selected expenditures on the LEDRS payment history
	<input checked="" type="checkbox"/>	Vendor Invoices	To coincide with the selected expenditures on the LEDRS payment history
	<input checked="" type="checkbox"/>	Certificate of Need / Evidence of IACCT Referral <i>(if in residential placement)</i>	
	<input type="checkbox"/>	ICC Discovery Document <i>(where CSA funds ICC Services)</i>	
	<input type="checkbox"/>	Proof Medicaid Eligibility <i>(where applicable)</i>	
	<input checked="" type="checkbox"/>	Medicaid Authorization/Denial/ Appeals <i>(where eligible and services funded by CSA include, but not limited to, community-based behavioral health services – IHH, TDT, MHSS, residential services and TFC-CM)</i>	Medicaid Authorization to TFC –CM

PART II:**Exceptions****Selected
Clients:****Explanation/Description:**

Case No.111

Missing Medicaid authorization for TFC -CM

Case No.111

Missing consent to exchange information

Case No.

Case No.

Case No.

Case No.

Case No.

Case No.

Case No.

PART III:**Certification**

Name (Print) Mary Jo Jackson, CSA Coordinator

Date:10/21/21

Signature *Mary Jo Jackson, CSA Coordinator*

Date: 10/21/21

MANDATE TYPE: SPECIAL EDUCATION SERVICES IN AN APPROVED EDUCATIONAL PLACEMENT
(Expenditure Category 2g Special Education Private Day Placement)

PART I:	Selected Clients:	<input checked="" type="checkbox"/> Case No. 123	<input checked="" type="checkbox"/> Case No. 205	<input checked="" type="checkbox"/> Case No. 111	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	<input type="checkbox"/> Case No.	
	Documents Requested											
	Check Box if Submitted	Document Description					Auditor/Client Comments:					
	<input type="checkbox"/>	Proof of mandate eligibility (<i>Local form</i>)										
	<input checked="" type="checkbox"/>	IEP					For the period covering: 5/1/20 – 4/30/21					
	<input type="checkbox"/>	FAPT Notes (where applicable)					For the period covering					
	<input type="checkbox"/>	Utilization Reviews										
	<input checked="" type="checkbox"/>	Consent to Exchange Info					For the period covering: 5/1/20 -4/30/21 (only clients 123 and 205)					
	<input checked="" type="checkbox"/>	Provider placement agreement or rate sheet (for private day placements and a residential placements)					Centra Health (Client 123 and 111) Believe N U Youth Academy (Client 205)					
	<input checked="" type="checkbox"/>	Treatment Plans/Progress Reports					Centra Health (Client 123 and 111) SH Varsity Acquisition Sub LLC (Client 111 and 123) Believe N U Youth Academy (Client 205)					
	<input checked="" type="checkbox"/>	Proof of CPMT Funding Approval					To coincide with the selected expenditures on the LEDRS payment history					
<input checked="" type="checkbox"/>	Purchase Orders					To coincide with the selected expenditures on the LEDRS payment history						
<input checked="" type="checkbox"/>	Vendor Invoices					To coincide with the selected expenditures on the LEDRS payment history						

PART II:		Exceptions	
	Selected Clients:	Explanation/Description:	
	Case No.111	Missing progress notes for Centra Health (Oct 2020)- contacted provider to obtain	
	Case No.111	Missing invoice for SH Varsity Acquisition Sub LLC (Nov 2020) payment – contact case manager to see if it’s in her case files	
	Case No.		
	Case No.		
	Case No.		
	Case No.		
	Case No.		
	Case No.		
	Case No.		
	Case No.		
PART III:		Certification	
	Name (Print) Mary Jo Jackson, CSA Coordinator	Date: 10/21/21	
	Signature <i>Mary Jo Jackson, CSA Coordinator</i>	Date: 10/21/21	

The number of client records requested will be determined by case population indicated by CSA Utilization reports. A locality that has 300 cases, the auditor will request how many client records?





A. 5 client records

B. 10 client records

C. 15 client records

D. 20 client records





A. 5 client records

B. 10 client records

C. 15 client records

D. 20 client records



True/False

The standardized documentation request form will focus on specific documents rather than the full client record.



A. TRUE

B. FALSE



A. TRUE

B. FALSE



Audit Preparation Resources

▶ **CSA Website**

- **CSA User Guide**
- **Self Assessment Workbook**
- **Audit Reports**
- **Virginia Learning Center – Training Modules**

▶ **Local Program**

- **Internal Quality Assurance Assessments**
- **Corrective Action Plans**

How do we prepare for an audit using the Self-Assessment Workbook?



ANSWER: Short Version

- ▶ **Complete all sections**
- ▶ **Document areas of concerns**
- ▶ **Develop quality improvement plan (QIP)
(addresses areas of concern)**
- ▶ **Monitor implementation of QIP**
- ▶ **Report accomplishments to stakeholders**

Upcoming slides will offer suggestions for performing the assessment.

Section I: Governance

This section is primarily composed of questions and tasks to evaluate program oversight and highlight/suggest internal control best practices. There are no right or wrong answers, but should rather generate discussion whether further action by the CPMT may be warranted.

- ▶ **FAQ:** If the evaluation participants conclude that the local program does not meet the assessment criteria, are we required to perform the tasks described while completing or prior to submittal of the self-assessment workbook to OCS.
- ▶ **ANSWER:** No. The CPMT may elect to exercise its discretion to do so, but it is not required. If the CPMT elects not to complete the tasks described in the assessment criteria, the CPMT should consider whether to document a quality improvement plan to address observed concerns.

Section II: Risk Management

This section is primarily composed of questions and tasks to evaluate the CPMT's risk management practices, particularly identification of impediments to achieving program objectives and management's (CPMT) response to those concerns. There are no right or wrong answers, but should rather generate discussion whether further action by the CPMT may be warranted.

- ▶ **FAQ:** How do we identify and document our risk?
- ▶ **ANSWER:** To some degree you may have already, through informal collaborative discussions and activities. Examples include community needs assessments coordinated with the Annual Gap Survey and/or Promoting Safe and Stable Families (PSSF) Grant Plans. Localities are strongly encouraged to document risks identified and CPMT response using the Risk Assessment Worksheet found in the Self-Assessment Workbook or another resource that captures similar information.

The next slide provides an illustration of common risk categories that can also be used to generate discussion.

Section III: Internal Controls

This section is primarily composed of questions and tasks to evaluate the local CSA program's system of internal controls.

Internal controls are practices, policies, and procedures for assuring the achievement of an organization's objectives, operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.

There are no right or wrong answers, but should rather generate discussion whether further action by the CPMT may be warranted.

Section V: Compliance

This section is composed of compliance criteria established by the Code of Virginia, Children's Services Act (statutory) and policies adopted by the State Executive Council (SEC).

- ▶ **In this section, the local program should carefully examine local practices, policies, and procedures, and activities to determine the current status of achieving the compliance criteria: met (i.e. full), in progress (i.e. partial w/explanation), or non-compliance.**
- ▶ **Activities in this section are mostly at the operations/ transaction level, whereas Sections I through IV focused primarily on management's oversight responsibility.**

- ▶ **FAQ 3:** Several areas in the compliance section of the workbook instructions include a sample selection. May we use the same sample or do we have to select a different sample for each review area?
- ▶ **ANSWER:** Absolutely, you may use the same sample selection for each compliance area tested. However, the number of cases reviewed should be representative of that review area. Note: The same sample may also be used to assess local compliance.
- ▶ **EXAMPLE:** If your initial sample selection included only one special education (SPED) file and your total SPED client population is 100, consider expanding your sample size for that specific service area.

- ▶ **FAQ 5:** What documentation do I need to retain?
- ▶ **ANSWER:** You must retain documentation of the manner in which your sample was selected, to include: source of the data, total population used for selection, sample size selected, and methodology (random, judgmental, statistical, etc.).

You must retain a list of the client files that were selected and reviewed, noting who performed the review. This may be recorded on the same document you used to evidence your sample methodology.

You must retain a summary of the results of your review. This may be recorded on the same document you used to evidence your sample methodology and/or listing of client files reviewed.

Section VI: Quality Improvement

In this section, the CPMT is encouraged to develop and document a plan to address areas of concern that were observed during the self-assessment process. The quality improvement plan should incorporate:

- ▶ tasks to be implemented,
- ▶ anticipated date of completion, and
- ▶ person(s) responsible for monitoring status of quality improvement plans.

The workbook includes a template that you can use to document and monitor the process.



Stress Break Fun Trivia



Which is the only American Football team
to go a whole season undefeated,
including the Super Bowl?

- A. Seattle Seahawks
- B. The Miami Dolphins
- C. Baltimore Ravens
- D. Dallas Cowboys





Which is the only American Football team
to go a whole season undefeated,
including the Super Bowl?

- A. Seattle Seahawks
- B. The Miami Dolphins
- C. Baltimore Ravens
- D. Dallas Cowboys



Audit Reports

- ▶ **May inform discussions and decision making that affect program quality improvement efforts. Include CSA specific and other related audits and/or reviews (e.g. local government annual financial audits or internal audits, Title IV-E reviews, etc.)**
- ▶ **Provide an opportunity to discover from other programs where improvements may be warranted in your program.**
- ▶ **Allows for identification and correction of deficiencies prior to the next audit.**

Internal Quality Assessments & Corrective Action Plans

- ▶ **Results of on-going monitoring activities; may be reflected in CPMT minutes and accompanying reports.**
- ▶ **Documented tasks and strategies to address deficiencies and/or management concerns**
- ▶ **For CSA program audits, corrective action plans are referred to as “Quality Improvement Plans (QIP).”**

QIP Considerations

An actionable plan should

- ▶ Describe tasks to be completed in sufficient detail to ensure that it will address the identified concern.
- ▶ Identify reasonable timeframes to implement quality improvement; formal plans may be used as a “punch list” to encourage timely resolution of noted deficiencies.
- ▶ Identify parties responsible for ensuring implementation and communicating progress to the CPMT.
- ▶ Be monitored to ensure concerns are resolved satisfactorily or strategies/tasks are modified where appropriate.

QIP STATUS REPORTING

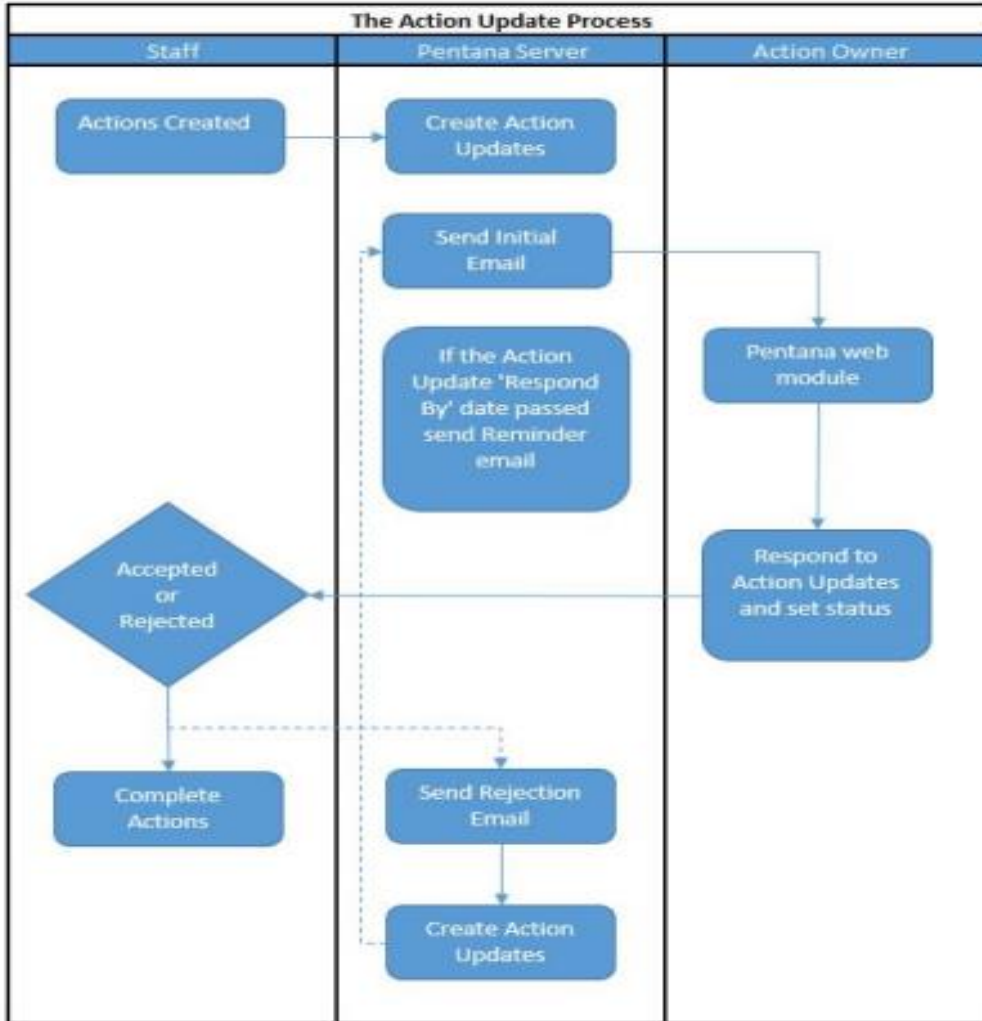
- Community Policy and Management Teams (CPMT) and auditors should continuously monitor implementation of the QIP as a means to ensure reported audit observations are addressed appropriately and timely.
- OCS program auditors use Pentana Audit Management Software, which includes a module referred to as “Action Tracking” that allows for timely and ongoing monitoring of the status of QIP tasks (i.e. action items).
- The application monitors “Action” status based on estimated implementation dates provided by clients.

QIP STATUS REPORTING

- CPMT representatives will be assigned a user account and will receive an email with a link to reset their account password. This will grant the user access to the Action Tracker Dashboard.
- The application generates email notifications to a designated CPMT representative instructing them to provide an update on the status of their QIP by a specified due date.
- The designated CPMT representative will then click on a link that will take them directly to the “action item” where they can record the status update. Subsequent reminders will continue until the action item is completed.

Action Update Work Flow

The diagram below shows the normal work flow around Action Updates and has been included for information purposes only.



Action Update Process Flow

Action Tracker

Password Reset Notification

From: csa.audit@csa.virginia.gov

Date: October 5, 2021 at 4:21:03 PM EDT

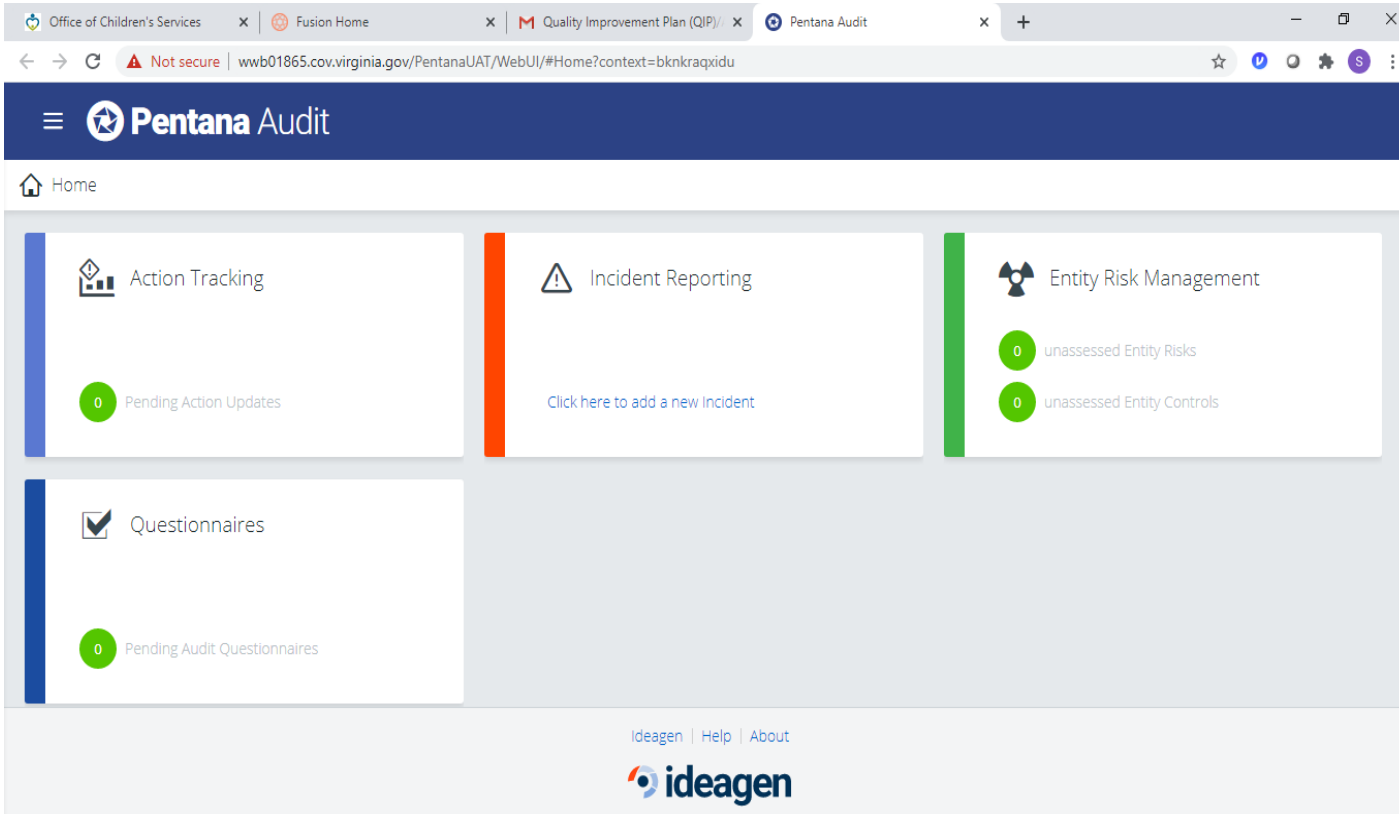
To: [Redacted]

Subject: Password Reset

Please follow the link to reset your password:

[https://wwb01865.cov.virginia.gov/PentanaUAT/FBA/Account/Account_Login.aspx?id=\[Redacted\]&token=sDuPLxmk7UxZvn30q8Aacq2&type=reset](https://wwb01865.cov.virginia.gov/PentanaUAT/FBA/Account/Account_Login.aspx?id=[Redacted]&token=sDuPLxmk7UxZvn30q8Aacq2&type=reset)

Action Tracker Dashboard



Office of Children's Services x Fusion Home x Quality Improvement Plan (QIP) x Pentana Audit x


Not secure | www01865.cov.virginia.gov/PentanaUAT/WebUI/#Home?context=bknkraqxidu

Pentana Audit

Home

- Action Tracking**
0 Pending Action Updates
- Incident Reporting**
[Click here to add a new Incident](#)
- Entity Risk Management**
0 unassessed Entity Risks
0 unassessed Entity Controls
- Questionnaires**
0 Pending Audit Questionnaires

Ideagen | Help | About



Participant Engagement



For the remainder of the workshop, we will use case studies and supplemental materials to demonstrate how to use the resources discussed when preparing for a CSA program Audit.

▶ **Case Study**

- ▶ **Abridged version of the actual workbook**
- ▶ **Abridged version of an Audit Report**
- ▶ **Sample Quality Improvement Plan**

Participants are encouraged to ask questions



Stress Break Fun Trivia



Which country borders 14 nations and crosses 8 time zones?

- A. China**
- B. United States**
- C. Russia**
- D. Brazil**






Highlights

- ▶ Rules of engagement are outlined in the CSA User Guide and e-learning modules in the COV Learning Center.
- ▶ Preparation resources include: audit reports, corrective action plans, self-assessment workbook, training events and e-learning modules.
- ▶ Maintain documentation of your audit preparation. May be useful for future audits.
- ▶ Ensure concerns are addressed resolved satisfactorily or develop a quality improvement plan, where appropriate.



A-TEAM CONTACT INFORMATION

Name	Title	Phone/Email
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<p data-bbox="137 691 459 736">Annette Larkin</p> 	<p data-bbox="625 691 805 793">Program Auditor</p>	<p data-bbox="1097 715 1344 751">(804) 662-9816</p> <p data-bbox="938 758 1503 793">Annette.Larkin@CSA.Virginia.Gov</p>
<p data-bbox="146 938 450 983">Rendell Briggs</p> 	<p data-bbox="625 938 805 1041">Program Auditor</p>	<p data-bbox="1097 962 1344 998">(804) 662-7402</p> <p data-bbox="948 1005 1499 1041">Rendell.Briggs@CSA.Virginia.Gov</p>