



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

August 2, 2018

Ms. Patricia Wright, CPMT Chair  
Caroline County CSA Program  
POB 430  
Bowling Green, VA 22427

RE: Caroline County Children's Services Act (CSA) Program Audit Self-Assessment  
Validation, File No. 40-2018

Dear Ms. Wright,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the Caroline County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local CSA Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 11, 2018 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 Caroline County CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

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

***The Caroline County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified deficiencies indicating non-compliance 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 Commonwealth Specifics pertaining to the Caroline County CSA Program are detailed on page two (2).***

## SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

### REPEAT OBSERVATIONS

1. The Caroline County CPMT has not documented a formal plan to substantiate coordination of long-range, community-wide planning as required by Code of Virginia (COV) [§ 2.2-5206](#), Item 4.
2. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with COV [§ 2.2-5206](#), items 6 and 13. CPMT monthly meeting minutes and accompanying reports did not evidence utilization management/utilization review (UM/UR) activities to include:
  - A. review of local and statewide data provided in the management reports on the number of children served, children placed out of state, demographics, types of services provided, duration of services, service expenditures, child and family outcomes, and performance measures.
  - B. tracking the utilization and performance of residential placements using data and management reports to develop and implement strategies for returning children placed outside of the Commonwealth, preventing placements, and reducing lengths of stay in residential programs for children who can appropriately and effectively be served in their home, relatives homes, family-like setting, or their community.

The non-compliance observations referenced in this report were also identified in the prior audit report issued June 29, 2015. The Caroline County CPMT submitted a Quality Improvement Plan (QIP) with February 2016 as the target date for completion. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure timely implementation of the plan and the actions taken are continuously working as intended.

### RECOMMENDATIONS

1. The Caroline County CPMT should ensure coordination of long-range planning is formally documented, which includes the establishment of locally specific performance metrics.
2. The Caroline County CPMT should immediately initiate and going forward periodically review of OCS financial and performance reports as required by CSA statute to demonstrate compliance. Management reports are available on the CSA website in the tab labeled "Statistics and Publications". See links below:
  - A. <http://www.csa.virginia.gov/OCSDData/ReportsPublications>
  - B. [State & Local CSA Performance Measures \(Excel Application\)](#)
  - C. [CSA Utilization Reports](#)
3. The Caroline County CPMT should consider adding utilization management as a standing agenda item for their regularly scheduled CPMT meetings. The recorded minutes of the CPMT meeting should reflect a summary of CPMT's discussions and actions to be taken, if any. A copy of reports reviewed should be retained with the minutes.

**CLIENT COMMENTS**

1. Caroline County CPMT acknowledges the need to develop a plan to coordinate long-range planning to address locally specific performance metrics.
2. Caroline County CPMT acknowledges the need to gather formal performance measures and utilization management practices and procedures to assess overall program effectiveness. Locally specific data will be presented on a monthly basis at the CPMT meeting. On a quarterly basis, OCS financial and performance reports will be presented at monthly CPMT meetings. Caroline County would like for it to be noted at the July 2018 CPMT meeting, CPMT reviewed CSA Performance Measures and Demographic Reports for Fiscal Year 2018 Quarter 4 for Community Based Services, Special Education Services, Foster Care Basic Maintenance and Treatment Foster Home.

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.

We would like to thank the Caroline County CPMT 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 Megan Sparks, CSA Coordinator during our on-site visit. Ms. Sparks' 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,



Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Charles M. Culley, Jr., Caroline County Administrator  
Anne Tyree, CPMT Fiscal Agent  
Megan Sparks, CSA Coordinator