



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 27, 2017

Ms. Angela Rose, CPMT Chair/Fiscal Agent
Nelson County CSA Program
P.O. Box 357
Lovingston, VA 22949

RE: Nelson County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 47-2015

Dear Ms. Rose,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Nelson 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 7, 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 Nelson County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Nelson County 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 a deficiency 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 Nelson County CSA Program are detailed on page two (2) of this report.

SIGNIFICANT NON-COMPLIANCE OBSERVATION

Three client case files were examined to validate conclusions reported by the Nelson County CSA program. In all of the cases reviewed, data collected through the Child and Adolescent Needs and Strengths (CANS) was not submitted to OCS utilizing a secure electronic database as required per CSA statutes and policies adopted by the State Executive Council. The assessments were documented on paper instead of using the secure application (CANVaS) developed to collect the required data. In addition, the CANS assessment was not completed upon discharge from CSA services for two of the eligible cases.

The collection of the assessment data is critical to evidencing the appropriateness of services provided and compliance with CSA funding requirements. Aggregately, this information is utilized for informed decision making by state and local stakeholders. Data that that is collected but not properly recorded affects the accuracy of the information reported and may lead stakeholders to question the reliability and integrity of the data generated pertaining to established CSA performance indicators and overall effectiveness of the CSA program.

Criteria: [CSA FY17-18 Appropriations Act](#), CSA Policy Manual Section 3.6, Mandatory Uniform Assessment Instrument, [CANS Frequency of Administration - Updated 2013](#)

RECOMMENDATION

The CPMT should ensure that periodic case reviews are performed by someone other than the CSA Coordinator to establish quality control of client records and to ensure compliance with CSA policy and statutory requirements. As a component of the quality control process, the CPMT should consider completing a reconciliation/verification of the client case file listings against assessments entered into the CANVaS application.

The Office of Children's Services respectfully requests that you submit a quality improvement plan addressing the observations detailed 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 task 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 Nelson County CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the assistance and cooperation that was provided by Allison McGarry, CSA Coordinator during our on-site visit. Ms. McGarry'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,



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Stephen A. Carter, Nelson County Administrator
Allison McGarry, CSA Coordinator
SEC Finance and Audit Committee