

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

**City of Norton
*Self-Assessment Validation***

Final Audit Report No. 39-2022

July 25, 2023



Office of Children's Services
Empowering communities to serve youth

Report Disclaimer

Due to the COVID-19 pandemic, onsite visits to validate management's conclusions were suspended. In lieu of onsite visits, self-assessment validation activities were conducted remotely.



COMMONWEALTH of VIRGINIA

Scott Reimer, M.S.
Executive Director

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

July 25, 2023

Glenda Collins, CPMT Chair
Lonesome Pine Office on Youth
PO Box #568
Big Stone Gap, VA 24219

RE: City of Norton CSA Program Self-Assessment Validation (SAV)
Final Report, File No. 39-2022

Dear Ms. Collins,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2022, the City of Norton 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. Based on the review and examination of the self-assessment workbook and supporting documentation completed by the City of Norton CSA program on January 25, 2022, and covering the period November 1, 2020 through October 31, 2021, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion of the City of Norton CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services on behalf of the City of Norton CSA Program. However, validation procedures documented a significant non-compliance observation not identified by the CPMT. 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 are detailed on page 2 of this report.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

During the period of review, expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State and local CSA policies and procedures were not met. Notable exceptions were present in two (2) client records examined. Itemized below are the specific issues observed. Refer to Table A for a detailed breakdown of the applicable questioned costs.

- A. Per Code of Virginia (COV) § 2.2-5212, access to the state pool of funds includes determination through a uniform assessment instrument and process. The Child and Adolescent Needs and Strengths (CANS) Assessment is the approved uniform assessment instrument per CSA policy adopted in 2009. The CANS assessment is required initially, annually, and upon discharge from the CSA process. An initial CANS had not been completed for one (1) client case file examined, resulting in \$1,946.14 (state share) in questioned costs. Refer to Client A in the table below.
- B. CSA funded foster care maintenance costs totaling \$360.64 (state share) on behalf of a Title IV-E eligible client. Exceptions were validated by analyzing CSA and Title IV-E payments reported in the Local Expenditure Data and Reimbursement System (LEDRS) and verification of Title IV-E eligibility determination forms. COV [§ 2.2-5211](#) states, the community services board, the local school division, local social services agency, court service unit or Department of Juvenile Justice shall continue to be responsible for providing services identified in individual family service plans that are within the agency's scope of responsibility and that are funded separately from the state pool" Refer to Client B in the table below.

Client	Exception Type	Period of Service	Total Cost	State share
A	A	Dec 2020 – Feb 2021	\$ 2,884.88	\$1,946.14
B	B	Apr 2021 – May 2021	\$534.60	\$ 360.64
Total			\$3,419.48	\$2,306.78

RECOMMENDATIONS

1. Before authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding (i.e., all federal and state requirements). Adequate documentation should be maintained as justification for CPMT funding decisions, such as, but not limited to, CANS (initial and annual) have been completed and ensuring that expenditures are not eligible for other funding sources such as Title IV-E.
2. As a part of the CPMT's quality assurance review and monitoring efforts, the CPMT should track CSA-funded cases pending title IV-E eligibility determination and confirm reimbursement of CSA pool funds for foster care maintenance costs where appropriate.
3. The CPMT should submit a quality improvement plan for review by the OCS Finance Office, including whether the CPMT agrees with the observations regarding questioned costs. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director based on SEC-approved policy 4.7 Response to Audit Findings of whether the identified actions are acceptable or any additional actions that may be required.

CLIENT COMMENTS

“We have completed a deep search for any documentation to dispute these findings and have found none. The Community Policy and Management Board met on July 24 and reviewed these findings. We agree with the auditors’ findings. We do plan to correct these findings moving forward by: before authorizing funding, the CPMT will make every effort to ensure that the proposed expenditure meets the criteria for CSA funding. Our QI reviews will ensure that adequate documentation will be maintained as justification for CPMT funding decisions, such as CANS have been completed and ensuring that expenditures are not eligible for other funding sources such as Title IV-E.

As a part of the CPMT's quality assurance review and monitoring efforts, the CPMT will track CSA-funded cases pending title IV-E eligibility determination and confirm reimbursement of CSA pool funds for foster care maintenance costs where appropriate.

The CPMT will submit a quality improvement plan for review by the OCS Finance Office.”

The Office of Children's Services respectfully requests that you submit a quality improvement plan (QIP) to address the observation outlined in this report no later than 30 days from receipt of this report. We ask that you notify this office as QIP 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 thank the City of Norton Community Policy and Management Team, CSA staff, and partners for contributing to the CSA Self-Assessment Workbook. We also acknowledge the excellent assistance and cooperation provided by Abe Rutherford, DSS Director and acting CSA Coordinator. Mr. Rutherford’s efforts enabled the audit staff to resolve any questions/concerns we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Fred L. Ramey, Jr., Norton City Manager
Barbara Muir, CPMT Fiscal Agent
Abe Rutherford, DSS Director/Acting CSA Coordinator