



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

July 10, 2019

Ms. Sandra Crawford, CPMT Chair
Augusta/Staunton/Waynesboro CSA Program
6 E. Johnson Street
Staunton, VA 24401

RE: Augusta/Staunton/Waynesboro Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 28-2019

Dear Ms. Crawford,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Augusta/Staunton/Waynesboro 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 February 25, 2019 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 Augusta/Staunton/Waynesboro CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Augusta/Staunton/Waynesboro CPMT that 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 Augusta/Staunton/Waynesboro CSA. However, all significant non-compliance observations were not addressed in the assessment submitted for review and validation by OCS. The explanation for our assessment results are as follows:

The Augusta/Staunton/Waynesboro CPMT concluded that there were significant non-compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified other deficiencies, not identified by the locality, indicating non-compliance with the statutory requirements of CSA. This is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Augusta/Staunton/Waynesboro CSA Program are detailed on pages two (2) and three (3) of this report.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. Membership of the CPMT was not consistent with state and locally established requirements during the period of review (November 2017 – October 2018). The CPMT does not have a private provider representative in accordance with COV [§ 2.2-5205](#). However, a private provider representative serves as a member of the two (2) out of the three (3) Family Assessment and Planning Teams (FAPT). The role of private provider is optional for FAPT. The absence of the private provider representative impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community. The CPMT would have met the Children’s Services Act compliance requirements regarding the private provider representative had they elected to have the private provider serving on the FAPT appointed to CPMT instead. The CPMT has since advised of the appointment of a provider representative to the CPMT on April 11, 2019.
2. Six (6) client case files were examined to validate conclusions reported by the by Augusta/Staunton/Waynesboro CPMT. Two (2) cases from each locality were reviewed. At least one (1) exception was noted in each of the six cases examined. The results of that review indicate improvement is needed in the documentation of service planning and funding decisions, which resulted in the request and reimbursement of \$62,044.46 (state share) in fiscal years 2018-2019 for expenditures incurred that did not meet compliance requirements of CSA. Exceptions as noted in the table below are deemed significant, as they are critical to evidencing the appropriateness of services and compliance with CSA funding requirements.

Client File Review Exception Summary and Detailed Cost Breakdown						
Exception Rate		Description				
83% (5 of 6)		Initial or annual comprehensive Child and Adolescent Needs and Strengths (CANS) assessments were not completed. Where an annual comprehensive CANS was required, the reassessment version was documented instead.				
16% (1 of 6)		CPMT authorization of funding was not evidenced for community-based services recommended by FAPT and were documented in an IFSP.				
Locality	Client ID	Exception	Service Description	Period	Total	State Share
Augusta	B	1	Special Education Private Day	10/2017 - 10/2018	\$ 75,899.00	\$ 61,979.12
Waynesboro	I	2	Intensive Care Coordination	Nov-17	\$ 80.01	\$ 65.34
Exception Description Legend:				Total	\$75,979.01	\$62,044.46
1 Missing initial CANS						
2 Missing evidence of CPMT funding authorization						

Criteria: COV [§ 2.2-5206](#); [§ 2.2-5208](#); [§ 2.2-5212](#); CSA Policy Manual Sections 3.5, Records Management and CSA Policy Manual Section 3.6, Mandatory Uniform Assessment Instrument

RECOMMENDATIONS

1. The Augusta/Staunton/Waynesboro CPMT should ensure that composition of the CPMT meets the minimum requirements established by CSA statute. The CPMT should actively recruit to fill vacancies when they occur. Documentation of recruitment efforts should be maintained.
2. Prior to service planning, the CSA Coordinator and the FAPT should ensure that minimum documentation requirements are met and correspondence is maintained in the client case file or readily accessible in order to substantiate services recommended to CPMT for funding authorization. Someone other than the CSA Coordinator should perform periodic case reviews 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 incorporating use of the [CSA Documentation Inventory](#), which is available on the CSA website.
3. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding, to include matching the period of services covered to the IFSP and documented authorization by the CPMT for the period expenditures were incurred.
4. 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 of whether the identified actions are acceptable or any additional actions that may be required.

CLIENT COMMENTS

1. The Augusta/Staunton/Waynesboro CPMT did actively recruit to fill vacancies. Documentation of recruitment has been maintained. A Private Provider Representative was officially appointed on April 10, 2019 by the Augusta County Board of Supervisors in response to our recruitment efforts.
2. ICC services for Waynesboro case "T" were authorized by CPMT for six months. The service continued for four days past the CPMT authorization. FAPT had met and approved the additional time however the addition four days did not go before CPMT for an additional authorization as our local CPMT policy at that time stating that expenditures below \$15,000 did not require CPMT approval.
3. The Augusta/Staunton/Waynesboro CPMT has been aware of our areas of deficiency in receiving CANS Assessments on school cases. This was acknowledged as an area of concern in several CPMT meetings, as evidenced by our CPMT meeting minutes. We have sought additional support and clarification from OCS in this area. A response dated August 20, 2018, from Kristi Schabo, provided the Augusta/Staunton/Waynesboro CPMT with the clarification needed for how the CANS requirement applied to IEP Private Day cases. At that time the Augusta/Staunton/Waynesboro CPMT implemented a corrective action plan with our three local school divisions. Since that time, beginning with 2018-2019 school year, there have been drastic improvements in CANS compliance with our school partners on IEP private day cases. This particular case reviewed was missing the CANS from the 2017-2018 school year. Since Augusta/Staunton/Waynesboro CPMT has already taken actions to address our deficiencies in this area, we would respectfully request to not be penalized for the 2017 CANS

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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 Augusta/Staunton/Waynesboro 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 provided by Crystal Breeden, CSA Coordinator during our on-site visit. Ms. Breeden'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
Timothy Fitzgerald, Augusta County Administrator
Stephen F. Owen, Staunton City Manager
Michael G. Hamp, II, Waynesboro City Manager
Lisa Dunn, CPMT Fiscal Agent
Crystal Breeden, CSA Coordinator