



# COMMONWEALTH of VIRGINIA

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

Scott Reiner, M.S.  
Executive Director

August 13, 2019

Andrew Crawford, CPMT Chair  
Bedford County CSA Program  
P.O.Box 1187  
Bedford, VA 24523

RE: Bedford County CSA Program Self-Assessment Validation, File No.22-2019

Dear Mr. Crawford,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2019, the Bedford County 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. An on-site visit was scheduled and conducted by OCS Program Auditors on June 11, 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 Bedford County CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

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

***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 Bedford County CSA Program are detailed on page 2.***

### SIGNIFANT NON-COMPLIANCE AND REPEAT OBSERVATIONS

1. Expenditure reimbursements were requested and processed for payment of services where the eligibility requirements for compliance with State CSA policies and procedures were not met. The Bedford County CSA program funded speech therapy services during the June 2018 and July 2018 that were not included in an approved Individualized Educational Program (IEP) for a student with an educational disability. The total questioned cost equals \$350 of which, \$241.12 represented the state share.

**CRITERIA:** Code of Virginia (COV) §2.2-5200; COV §2.2-5211; Individuals with Disabilities Education Act (IDEA); 34CFR §300.323

2. Written policies and procedures are not consistent with State statutes, established state CSA guidance, and/or best practices, which direct the CPMT to ensure that procedures are established to govern local CSA programs. Specifically, written policies and procedures have not been established to govern:
  1. Intensive Care Coordination (ICC),
  2. bids for new services,
  3. client appeal process, and
  4. records retention and destruction .

The non-compliance observation pertaining to ICC, bids for new services and client appeal process was also identified in the CSA audit report dated 8/1/17. A quality improvement plan (QIP) was submitted in response to the audit report, which stated that within 90 days of the issuance of the final report the policy would be updated and adopted. The purpose of a QIP is to ensure management takes appropriate action to resolve deficiencies in a timely manner. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure the implementation of the plan and the actions taken are working as intended.

**CRITERIA:** COV § 2.2-5206 item 7, 17 and 18; CSA Policy Manual 6.1 Intensive Care Coordination 3.5, Library of Virginia – Virginia Public Records Management Manual Chapter 8: Records Destruction; OCS Policy Manual 3.5 Records Management; Department of Accounts Agency Risk Management Internal Control Standards (ARMICS): Control Activities

### RECOMMENDATIONS

1. The CPMT and CSA Coordinator should ensure all expenditures are supported by an individual service plan prior to paying an invoice.
2. 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.
3. The CPMT should initiate an immediate review of their policies and procedures and update the policies where applicable to ensure full compliance with all COV statutes, CSA mandates and best practices.

**CLIENT COMMENT**


1. "Paul Baldwin, Bedford County CSA Coordinator, reviewed and shared the draft report with Bedford County CPMT at our July 25, 2019 meeting. Bedford County CPMT acknowledged that the missing items in local policy are accurate and have included the goal of reviewing and updating local policy as a part of the FY20 Strategic Plan for Bedford County."
2. "CSA Staff and BCPS staff checked to make sure an addendum had not been completed to reflect the services delivered and paid for. It was determined child received services not listed in IEP and was not suppose to receive Speech Therapy Services in extended school year months of June and July 2018. Speech therapy services for this youth are listed in the IEP as ending on May 24 2018. We are going to ask the provider to reimburse Bedford County for the two months of service paid in error. CSA staff have also contacted the provider to communicate future speech therapy services in extended school year are not to be provided and will not be paid for by Bedford County CPMT."

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. We ask that you notify this office as quality improvement 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 would like to thank the Bedford County Community Policy and Management Team 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 Paul Baldwin, CSA Coordinator during our on-site visit. Mr. Baldwin's efforts enabled the audit staff to resolve quickly any questions/concerns that 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  
Robert Hiss, County Administrator  
Petrina Grubbs, CPMT Fiscal Agent  
Paul Baldwin, CSA Coordinator