



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 2, 2017

Ms. Deborah Burkett, CPMT Chair
Brunswick County CSA Program
201 Sharp Street
Lawrenceville, VA 23868

RE: Brunswick County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 52-2015

Dear Ms. Burkett,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Brunswick 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 April 14, 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 Brunswick County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Brunswick 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 Brunswick County CSA. The explanation for our assessment results are as follows:

The Brunswick 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 major deficiencies¹ indicating non-compliance and internal control weaknesses 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. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affecting CSA funded activities, as well as monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organization's internal control structure are considered significant. Specifics pertaining to the Brunswick County CSA Program are detailed on pages two (2) through four (4).

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. The Brunswick County CPMT had not established formal performance measures and utilization management practices and procedures to assess overall program effectiveness. Monthly meeting minutes and accompanying reports did not evidence utilization management/utilization review (UM/UR) activities to include:

- 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.
- track 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.

Criteria: COV§2.2-5206, Items 6 and 13

2. Three (3) of six (6) client case files reviewed by Brunswick County CSA were selected to validate conclusions reported by the Brunswick County CSA program. The results of that review indicate improvement is needed in the documentation of service planning, funding decisions, and utilization reviews. Exceptions as noted in the table below are deemed significant as they are critical to evidencing of the appropriateness of services and compliance with CSA funding requirements. Criteria: COV§2.2-5208; CSA Policy Manual Section 3.5, Records Management

Exception Description	Error Rate
Individual Family Service Plans (IFSP) missing data elements: measurable outcomes, strengths, needs, discharge planning, duration of services, parent signatures, etc.	100% (1 of 3)
Missing Child and Adolescent Needs and Strength (CANS) Assessments (initial, reassessments, annual, and/or discharge)	33% (1 of 3)
Evidence of client case specific utilization review	33% (1 of 3)

RECOMMENDATIONS: The Brunswick County CPMT should take appropriate action to ensure that the non-compliance observations are addressed in the immediate future as follows:

1. The CPMT should establish performance criteria to monitor and analyze overall effectiveness of the local CSA program. In addition the CPMT should adopt policies/procedures to govern utilization management activities. The CPMT could initiate the discussion using the [Utilization Management Guidelines](#) published on the CSA website.
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. Periodic case reviews should be 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 adopting guidelines pertaining to [CSA Documentation Inventory](#) and [Utilization Review Guidelines](#), which are published on the CSA website.

CLIENT COMMENT:	<ol style="list-style-type: none"> 1. Currently the CPMT is revamping the utilization management criteria to conform with the OCS/CSA recommendations. 2. All documentation requirements were for each client that received substantiate services recommended by FAPT to CPMT and approved for funding.
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SIGNIFICANT INTERNAL CONTROL WEAKNESSES

1. The by-laws adopted by the CPMT had not been updated since 1993. In addition, documented local policies and procedures were not aligned with current state statutes, policies, procedures and practices as noted by the following exceptions:
 - Procedure to govern management of current client file documentation has not been documented in the policies and procedures manual. Criteria: CSA Policy Manual Section 3.5 Records Management
 - The local policy governing referrals states “the BC CPMT shall assume responsibility for the provision of State Pool funded services to the youth/family on the thirtieth day after notification of their legal residence has been established in Brunswick County, or the referral from the sending locality is complete, whichever is later”. This language conflicts with the CSA Policy that states “the receiving CPMT jurisdiction must review the current IFSP and adopt or revise within 30 calendar days.” Criteria: CSA Policy Manual Section 4.2, Payment for Services and Change of Legal Residence.
 - The local policy governing “Eligibility for Services Purchased from the Funds Pool, Item B” needs clarification to ensure consistency in application of local policies by stakeholders responsible for implementation. Specifically,
 - Bullet “a” describes cases that do not require quarterly review. It also states that foster care case meeting certain criteria established in the policy shall be reviewed no less than annually. However, language in the section titled Referral/Review/Assessment Timelines states that “all IFSPs utilizing Funds Pool resources shall be reviewed, and if appropriate, revised by the FAPT every six months. The policy should identify the cases that require quarterly review and whether all reviews are required every six months to ensure consistent implementation of local policies, procedures, and practices.
 - Bullet “b” includes an itemized list of expenditures that are exempt from FAPT review as services to support routine foster care or parental agreement placements. The list includes descriptions of services that may represent duplicative foster care maintenance expenses (up to \$300 items needed for placement, up to \$350 start-up for a new foster child, maintenance services including child care). As written, it may suggest the potential to overfund maintenance expenditures. For example, a new foster child receives \$300 for items needed for placement plus \$350 for startup expenses that could be the same as items needed for placement, and the rate established per foster care maintenance that includes items that may be needed for placement.
2. The local policy governing “Emergency Access to Pool Funds” states that the “local department of social services is authorized to spend a maximum of \$3500 per child on an emergency basis within a fourteen day period within the guidelines of the policy for emergency services and shelter care. The local policy language does not explicitly align with Children’ Services Act Section 2.2-5209 in that it does not clarify “provided the youth are subsequently assessed by the family assessment and planning team or an approved collaborative, multidisciplinary team process within 14 days of admission and the emergency placement is approved at the time of placement.”

SIGNIFICANT INTERNAL CONTROL WEAKNESSES

RECOMMENDATION: The Brunswick County CPMT should take appropriate action to ensure that the identified weaknesses in internal controls are addressed in the immediate future. The CPMT should review and revise local CPMT and FAPT bylaws and policy/procedure manuals to ensure: (a) alignment with current CSA statutes and policies adopted by the State Executive Council for Children's Services (SEC), (b) removal of outdated references, and (c) establishment of policies to govern intensive care coordination, records management, and parental copayments. In addition, the CPMT should adopt a policy that will address the frequency of review of current policies.

CLIENT COMMENT:	The Brunswick County CPMT has updated our Strategic Plan and SOP's. We have begun revising the Bylaws and Policy/Procedure Manuals to align with CSA statutes and policies. This is an arduous task, especially since we do not have a full-time CSA Coordinator. We do not receive adequate Administrative funding; therefore, only 20% of the Brunswick CSA Coordinator's time is allotted to CSA workload and activities.
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The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observation outlined on this page 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 Brunswick 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 Linda Townsend, CSA Coordinator during our on-site visit. Ms. Townsends' efforts enabled the audit staff to quickly 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
Charlette T. Woolridge, Ph.D., Brunswick County Administrator
Jacqueline Mangrum, CPMT Fiscal Agent
Linda Townsend, CSA Coordinator

Attachment

Brunswick County Department of Social Services

201 Sharp Street
Lawrenceville, Virginia 23868
434-848-2142, Fax: 434-848-2828
February 21, 2017

Deborah W. Burkett
Director II

Ms. Stephanie Bacote, CIGA
Program Audit Manager
Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, Virginia 23229-5008

Re: Brunswick County CSA Program
Audit Self-Assessment Validation,
File No. 52-2015

Dear Ms. Bacote:

Attached is the Brunswick County's CPMT's response to the Draft Self-Assessment Audit results of our local CSA Program. As you know we continued using the Brunswick County CSA's IFSP form which had been approved by previous reviewers of our program. We have revised our form to reflect the weaknesses you identified during your audit and have been using it the past nine months. Also, our CSA Coordinator, Linda Townsend had all vendor agreements in the record which she has provided you copies of via fax transmittal. Ms. Townsend has been successful retrieving some CANS for C14-004 and C14-006 that were missing from the files; however, due to a staffing change with the case managers we are still waiting to receive some CANS missing from the case files.

We appreciate your willingness to work with us through the Self-Assessment Audit process. Our CPMT reviewed your preliminary findings yesterday and have already developed an action plan to address some of the issues.

Please let me know if you would like me to send you the CANS and any other documentation you believe is missing from the files and I have it sent to you. Thank you again for working with

ATTACHMENT

us. Please call me if you have any questions.

Sincerely,

Deborah W. Burkett

Deborah W. Burkett
CPMT Chair

Enclosure:

cc: Scott Reiner, M.S., Executive Director OCS
Charlette T. Woolridge, Ph.D., Brunswick County Administrator
Jacqueline Mangrum, CPMT Fiscal Agent
Linda Townsend, CSA Coordinator