

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

***Brunswick County  
Self-Assessment Validation***

***Audit Report No. 27-2022***

**January 10, 2023**



**Office of Children's Services**  
Empowering communities to serve youth



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

January 10, 2023

Diane Edmonds, CPMT Vice-Chair  
Brunswick County Department of Social Services  
201 Sharp Street, Suite 100  
Lawrenceville, VA 23868

RE: Brunswick County CSA Program Self-Assessment Validation  
Report File No. 27-2022

Dear Ms. Edmonds:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year (FY) 2022, the Brunswick County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of the local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Brunswick County CSA program completed January 27, 2022, and covering the period of July 1, 2020 through June 30, 2021, our independent validation of CPMT governance activities:

Concur                       Partially Concur                       Does Not Concur

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

***The Brunswick County CPMT concluded that there were no significant compliance and/or internal control weakness observations noted. However, validation procedures identified significant deficiencies not originally reported by the CPMT. Such breakdowns in an organizations internal control structure are considered significant. Specifics pertaining to the Brunswick County CSA Program are detailed on pages 2 through 4.***

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS**

1. Child and Adolescent Needs and Strength (CANS) assessments were not always managed in accordance with established CSA Policy 3.6.6.B. Mandatory Uniform Assessment Instrument regarding use of the CANVaS 2.0 Online Data System and the validity of assessments for three (3) of the five (5) (60%) client case records examined. Per policy, "all users requesting access shall agree to the terms of the User Agreement required to access the CANVaS 2.0 site. The agreement addresses access, security and confidentiality, and closure (completion) of assessments within a specified timeframe. The CANVaS 2.0 Individual Confidentiality and User Agreement states: *"In signing this agreement, the User acknowledges and agrees with the following: I will close CANS assessments when completed and not allow an assessment to remain open past the sixty-day mark."* While CANS assessments were documented in CANVaS 2.0, the assessments were not closed/completed within 60 days of the assessment date."

**CLIENT A**

ASSESSMENT REASON	ASSESSMENT STATUS	LOCALITY	START DATE	CLOSED DATE
Reassessment	CLOSED	Brunswick	11/02/2021	01/27/2022
Reassessment	CLOSED	Brunswick	05/02/2021	01/24/2022
Reassessment	CLOSED	Brunswick	11/02/2020	01/24/2022
Reassessment	CLOSED	Brunswick	05/02/2020	01/20/2022
Reassessment	CLOSED	Brunswick	11/02/2019	01/20/2022

**CLIENT B**

ASSESSMENT REASON	ASSESSMENT STATUS	LOCALITY	START DATE	CLOSED DATE
Reassessment	CLOSED	Brunswick	01/07/2022	01/28/2022
Reassessment	CLOSED	Brunswick	07/07/2021	01/28/2022
Reassessment	CLOSED	Brunswick	01/07/2021	01/28/2022
Reassessment	CLOSED	Brunswick	07/07/2020	01/28/2022
Reassessment	CLOSED	Brunswick	01/07/2020	01/28/2022

**CLIENT C**

ASSESSMENT REASON	ASSESSMENT STATUS	LOCALITY	START DATE	CLOSED DATE
Reassessment	CLOSED	Brunswick	09/23/2021	01/28/2022
Reassessment	CLOSED	Brunswick	03/23/2021	01/27/2022
Reassessment	CLOSED	Brunswick	09/23/2020	01/27/2022
Reassessment	CLOSED	Brunswick	03/23/2020	01/27/2022

2. In accordance with COV [§2.2-5206](#), [§2.2-5208](#) and local policy, the Brunswick County CPMT shall require a parental contribution assessment for services funded by CSA. CSA Policy 4.5.2, Pool Fund Reimbursements states all refunds are to be reported along with pool fund expenditure reports. However, Brunswick County CSA Refund Reports (see Table B) show zero collections of:

- a. Vendor Refunds in FY 2020 – FY 2021
- b. Parental Copays in FY 2018 – FY 2021
- c. SSA, SSI, VA Benefits in FY 2018 – FY2021
- d. Support through DCSE FY 2020 – FY 2021, and
- e. Reclaimed under IVE FY 2018 – FY 2021.

Utilization data indicates the locality has provided services and funding on average for sixteen (16) foster care clients for FY 2018 – FY 2021. Under these conditions, the opportunity lost for collection of funds is significant and could materially affect the local program’s ability to increase funding availability for services required to meet the needs of the community.

Financial Reporting Errors – Refunds								
FY	Vendor Refunds	Parental Copay	SSA, SSI, VA Benefits	Support through DCSE	Foster Care Count	Reclaimed Under IVE	Other	Total
2021	-	-	-	-	15	-	-	-
2020	-	-	-	-	15	-	-	-
2019	\$3,072.00	-	-	\$135.00	16	-	-	\$3,207.00
2018	-	-	-	\$436.00	16	-	-	\$436.00

**RECOMMENDATIONS**

1. During service planning and/or utilization review, the FAPT and CSA Office should ensure that CANS assessments are completed in accordance with CSA policies and CANVaS 2.0 user agreements. Exception reports should be documented and shared with CPMT periodically to foster accountability by all stakeholders for ensuring established internal controls are consistently working as intended.
2. The CPMT should establish and implement quality assurance policies and procedures to include periodic review of client case files, and monitor results to ensure compliance with CSA statutes, policies, procedures etc.
3. In accordance with SEC-approved policy 4.5.2, the CPMT should determine if there were any reclaimed IV-E reimbursements, Parental Copays, SSA/SSI/VA Benefits, and/or DCSE collections for the current and previous fiscal years. The CPMT should ensure that recoveries are refunded and reported to OCS with their next pool fund reimbursement.
4. Collection and reporting procedures should be established to ensure that the amount received for all refund reporting categories are recorded accurately and timely.

**CLIENT COMMENT**

“We concur with the findings.”

**INTERNAL CONTROL WEAKNESS**

3. Brunswick County CSA policies and procedures (last revised 07/2021) are not consistent with established state CSA requirements and/or best practices, to govern local CSA programs. Clear policies are necessary to facilitate and communicate the CPMT’s expectations in implementing CSA and to ensure the program is administered in accordance with state and local requirements. Opportunities for policy alignment and to clarify inconsistencies were noted as follows:
- A. Eligibility. Page 3, Section 2.2.1 Eligible Population C.D.E. The local policy includes outdated language pertaining to special education and foster care services. The local policy includes outdated verbiage regarding foster care services and omits special education transitional services. This section should be updated to reflect language that is consistent with COV.2.2-5212 and 63.2-905.
  - B. Foster Care Maintenance. Page 10, State Pool Funds, 3. B. addresses exemptions from FAPT review that do not align with COV requirements and foster care maintenance policies. This section should be updated to reflect language that is consistent with COV 2.2-5209 Virginia Department of Social Services (VDSS) Policy Manual, Section E. Foster Care, Funding Maintenance Cost 18.11.
  - C. Emergency Access to Pool Funds. Page 13, 3.7, Respite Care. The local policy states “the agency providing emergency respite services is authorized to spend a maximum of \$3,500 per child within a fourteen-day period. If services must be provided for more than fourteen days, the child shall be referred to FAPT for emergency review.” The existing policy warrants clarification. As written, it circumvents the statutory requirement for FAPT review of all services funded by CSA, except maintenance (where applicable) regardless of the length of time the service is funded.

**RECOMMENDATIONS**

- 1. The CPMT should immediately review and revise local policies and procedures to ensure alignment with COV statutes and policies promulgated by state child-serving agencies that are applicable to youth accessing state pool funds.
- 2. The CPMT should establish a process whereby local policies are periodically reviewed and updated accordingly. As a best practice, policy/procedure reviews should occur annually, but not less than every three years.

**CLIENT COMMENT**

“We concur with the finding.”

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 thirty (30) days from receipt of this report. In addition, we respectfully 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 Brunswick County CPMT and CSA staff and partners 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 Linda Townsend, CSA Coordinator and CSA staff during our review. Ms. Townsend'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,

  
Rendell R. Briggs, CAMS  
Program Auditor

  
Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Leslie R. Weddington, Brunswick County Administrator  
Joseph R. Blakenship CPMT Fiscal Agent  
Linda Townsend, CSA Coordinator