



COMMONWEALTH of VIRGINIA

Scott Reimer, M.S.
Executive Director

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

January 7, 2025

Linda Woods, CPMT Chair
Virginia Department of Health
9301 Lee Avenue
Manassas, VA 20110

RE: Manassas City CSA Program Self-Assessment Validation (SAV)
Final Report, File No. 24-2024

Dear Mrs. Woods,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2024, the Manassas City 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 Manassas City CSA program on December 18, 2023, and covering the period December 1, 2022 through November 30, 2023, our independent validation:

Concurs

Partially Concurs

Does Not Concur

The Manassas City CPMT concluded that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services. The explanation for our assessment results are as follows:

The Manassas City CPMT reported internal control weaknesses that they concluded were not significant. A summary of non-compliance observations reported by the CPMT is included in Attachment A. However, validation procedures identified deficiencies indicating non-compliance by the local CSA program that the CPMT did not identify. 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 of the Manassas City CSA Program are detailed on pages 2-4.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Observation 1 (Repeat Observation): The Family Assessment and Planning Team (FAPT) does not meet the membership requirements established by COV [§ 2.2-5207](#) due to a vacancy in the role of parent representative. The parent representative's absence potentially impedes the achievement of the highest degree of multi-disciplinary collaboration, ensuring family voice and choice in service planning activities. CPMT minutes do not document recruitment efforts to fill the vacancy. A prior OCS audit report dated December 20, 2018 identified a similar observation. The CPMT submitted a quality improvement plan (QIP). As the governing body, CPMT is responsible for ongoing monitoring of the QIP to ensure that the plan's implementation and actions are continually working as intended.

Observation 2: The Manassas City CPMT has not adopted a formal strategic plan with measurable goals/objectives, strategies, performance metrics/benchmarks, and target dates as required by COV [§ 2.2-5206](#). CPMT minutes for the review period did not evidence any discussion of long-range planning activities or progress. The absence of formal planning, coordination, and program evaluation reflecting the current operating environment ultimately impacts CPMT efforts to maximize state and community resources better to serve the needs of eligible youth and families.

Observation 3: A non-public member serving on FAPT since 2021 did not complete the statement of economic interest (SOEI) form per the requirements outlined in COV [§2.2-5207](#). OCS Administrative Memo #18-02, dated January 16, 2018, guided local CSA programs regarding filing requirements. The guidance states that non-public members must complete the "long" form defined in COV [§2.2-3117](#) upon appointment. It is to be noted that corrective action has been taken.

Observation 4: Five (5) client case files were examined to confirm that required documentation was maintained to support and validate FAPT or multi-disciplinary team (MDT) referrals and CPMT funding decisions. The results of that review indicate improvement is needed in the documentation of service planning and financial reporting. An exception was noted in 40% (2 of 5) of the client files reviewed. The exceptions noted are deemed significant, as they are critical to evidencing the appropriateness of services and compliance with CSA statutory requirements.

Client File Review Exceptions – No Fiscal Impact	
Exception Rate	Description
40% (2/5)	A. Service Planning: Client records missed the provider placement agreement and evidence of foster family participation in service planning activities. Criteria: CSA Policy 3.5 Records Management

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS- CONTINUED

Client File Review Exceptions – No Fiscal Impact

Exception Rate	Description																							
(40%) 2/5	<p>B. Data Integrity: Fiscal transactions were recorded using the incorrect expenditure category or service name description. These reporting errors represent internal control weaknesses in the reliability and integrity of the financial data used by management in decision-making and reporting to OCS. Criteria: CSA Policy 4.5 Fiscal Procedures</p> <table border="1"> <thead> <tr> <th>Error Type</th> <th>Client(s)</th> <th>Incorrect</th> <th>Correct</th> </tr> </thead> <tbody> <tr> <td>Expenditure Category</td> <td>A</td> <td>1E Congregate Care Educational Services</td> <td>2G Special Education Private Day Placement</td> </tr> <tr> <td rowspan="4">Service Names</td> <td rowspan="3">A</td> <td>29 Residential Education</td> <td>28 Private Residential School</td> </tr> <tr> <td>36 Special Education Related Services</td> <td>30 Residential Room and Board</td> </tr> <tr> <td>36</td> <td>29</td> </tr> <tr> <td>B</td> <td>10 Individual Support Services</td> <td>16 Maintenance Child Care Assistance</td> </tr> <tr> <td></td> <td></td> <td>4 Case Support</td> <td>27 Private Foster Care Support, Supervision and Administration</td> </tr> </tbody> </table>	Error Type	Client(s)	Incorrect	Correct	Expenditure Category	A	1E Congregate Care Educational Services	2G Special Education Private Day Placement	Service Names	A	29 Residential Education	28 Private Residential School	36 Special Education Related Services	30 Residential Room and Board	36	29	B	10 Individual Support Services	16 Maintenance Child Care Assistance			4 Case Support	27 Private Foster Care Support, Supervision and Administration
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RECOMMENDATIONS

OBSERVATION 1: The CPMT should ensure that the composition of the FAPT meets the minimum requirements established by CSA statute and local policy. The CPMT should actively recruit to fill the parent representative vacancy, and recruitment efforts should be documented in the CPMT minutes.

OBSERVATION 2:

- A. As required by CSA statute, Manassas City CPMT should coordinate long-range planning that ensures the development of resources and services needed by children and families in their community. The process should include developing a formal risk assessment process and measurable criteria for evaluating program effectiveness. The strategic plan should incorporate S.M.A.R.T. (Specific, Measurable, Attainable, Relevant, Timely) goals and objectives to facilitate effective and meaningful overall evaluations of the Manassas City CSA program.
- B. The long-range plan should include adopting the community philosophy regarding services to eligible youth and their families and identifying the current service delivery system to comply with local policy.
- C. The CPMT may use strategic planning tools on the OCS website to complete this initiative.
 - o [Strategic Planning Tools \(CQI\) Documentation Template with Instructions \(Download\)](#)
 - o [Strategic Planning Tools \(CQI\) Terms and Definitions](#)
 - o [Strategic Planning Tools \(CQI\) Training](#)

RECOMMENDATIONS CONTINUED

OBSERVATION 3: The CPMT should ensure all parties not representing a public agency complete the SOEI forms (Long Form) upon appointment and maintain filing in accordance with the Administrative Memo 18-02 dated January 16, 2018.

OBSERVATION 4:

- A. The CPMT should perform periodic case file reviews at least annually to establish quality control of client records and ensure placement agreements and evidence of foster family participation in service planning activities are in the client's record.
- B. The Fiscal Agent and the CSA Coordinator should work together to report expenses correctly (under the correct service name and expenditure category).

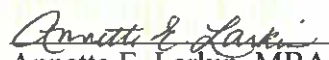
CLIENT RESPONSE


See Attachment B

The Office of Children's Services respectfully requests that you submit a quality improvement plan (QIP) to address the observations in this report by thirty (30) days from receipt of this report. In addition, we ask that you notify this office when the specified QIP tasks are completed. OCS will conduct a follow-up validation to ensure the quality improvements have been implemented as reported.

We thank the Manassas City Community Policy and Management Team, CSA staff, and partners for contributing to the CSA Self-Assessment Workbook. We also acknowledge Meaghan Turner, CSA Coordinator, who provided excellent assistance and cooperation during our review. Mrs. Turner's efforts enabled the audit staff to resolve any questions/concerns 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
Douglas Keen, Manassas Interim City Manager
Latanya Buckhalter, CPMT Fiscal Agent
Meaghan Turner, CSA Coordinator

Attachments



CSA Self-Assessment Validation
Carroll County CSA Program Audit- SAV
Summary of Self-Reported Non-compliance Observations

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/Status
<u>Governance</u> : Establish Intensive Care Coordination (ICC) policy and procedure.	COV 2.2-5206 SEC Policy 6.1 Intensive Care Coordination	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Completed 2/21/24

Auditor Comment: Manassas City CPMT self-reported the non-compliance observation in the table above as non-significant. However, compliance criteria are established in the Code of Virginia (COV). Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with state law. Further, this deficiency and the related quality improvement plan were reported in the most recent prior audit.



Joann Gainard, Chair
Family Assessment &
Planning Team (FAPT)

Linda Woods, Chair
Community Policy &
Management Team (CPMT)

9324 West Street, Manassas, VA 20110
Phone (703) 361-8277 x2335
Fax (703) 361-6933

December 23, 2024

Annette E. Larkin
Program Auditor
Office of Children's Services
1604 Santa Rosa Rd., Suite 137, Richmond, VA 23229

Dear Ms. Larkin:

Thank you for your visit to our CSA office on July 8, 2024, to perform the independent validation of our local CSA program's self-assessment, and your presentation of findings at our CPMT meeting on November 20, 2024.

As per our exit discussion, we note the following areas that must be addressed in order to bring our CSA program into full compliance:

1. Ensuring that all positions on the CPMT and FAPT are filled in accordance with the Code of Virginia. This will include active and continuous recruitment activity as vacancies occur and the documenting of such in the CPMT meeting minutes.
2. The Manassas City CPMT will ensure that there is a formal strategic plan developed and utilized to evaluate the performance of the goals, benchmarks and progress of the CSA program.
3. Completion of an official SOEI document by the non-public members of our CPMT and FAPT on an annual basis.
4. Strengthened documentation in the CSA case files to include:
 - A. Placement agreements are up to date for each child, and there is documentation that the foster families are part of the service planning for the child.
 - B. Coordinated efforts with the fiscal agent to report the correct service name and expenditure categories are being used.

We have already begun to address the above-stated deficiencies. A quality improvement plan detailing our actions in this regard will be submitted to OCS within the stated time period as per your request.



Joann Gainard, Chair
Family Assessment &
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The Manassas City CPMT appreciates your assistance in identifying areas of weakness that need to be strengthened in order to improve the quality of our CSA program and its service delivery to our community. We welcome the opportunity to effectively collaborate with the state Office of Children's Services in this regard.

Sincerely,

Signed by

A handwritten signature in black ink that reads "Linda Woods". The signature is written in a cursive style.

Linda Woods
CPMT Chair