



COMMONWEALTH of VIRGINIA

OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

Scott Reiner, M.S.
Executive Director

April 10, 2020

Denise Gallop, CPMT Chair
Norfolk Department of Human Services
741 Monticello Ave
Norfolk, VA 23510

RE: City of Norfolk CSA Program Self-Assessment Validation, File No. 31-2020

Dear Mrs. Gallop,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2020, the City of Norfolk 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 February 20, 2020 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 City of Norfolk CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the City of Norfolk 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 City of Norfolk 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 City of Norfolk CSA Program are detailed on pages 2-3.

SIGNIFICANT NON-COMPLIANCE OBSERVATION

1. Internal controls established by CSA statutes were not effectively implemented by the CPMT in order to safeguard against conflict of interest in the recommendation of services for eligible youth and their families. Specifically, non-public members (i.e., parent representative) serving on a Family Assessment and Planning Team (FAPT) did not complete the required Statement of Economic Interest (SOEI) submission. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds are significantly reduced based on the increased opportunity for possibility that personal interest were not appropriately disclosed by required parties. Upon notification, the parent representative completed and filed the required SOEI form.

Criteria: Code of Virginia (COV) Sections § 2.2-3100; § 2.2-3101; § 2.2-3117; § 2.2-5207; OCS Administrative Memo #18-02 [Statement of Economic Interest Filings for FAPT and CPMT Members](#)

RECOMMENDATION

The CPMT should ensure upon appointment that non-public members serving on the FAPT complete the statement of economic interest form in accordance with COV statutes and Office of Children Services (OCS) Administrative Memo 18-02.

CLIENT COMMENT

“Concur”

INTERNAL CONTROL WEAKNESS

2. Written policies and procedures are not consistent with COV statutes, established State CSA guidance, and/or best practices. A review of the City of Norfolk policies and procedures manual for the administration of the Children’s Service Act noted that Section F (*Services for youth over 18*) establishes provisions for funding the completion of residential treatment services for a youth meeting the Child in Need of Services (CHINS) Parental Agreement criteria past their 18th birthday. There is no statutory authority or legal mechanism to access CSA funding to serve those young adults. Although the policy would permit such practices, a cursory review of financial reports depicting expenditures for clients classified as CHINS-Parental Agreement did not indicate that CSA funded any services beyond the clients 18th birthday.

Criteria: (COV) Sections §16.1-228; SEC Policy 4.1 Eligible Populations

RECOMMENDATIONS

1. The CPMT should conduct an immediate review of all policies and procedures to ensure alignment with COV statutes, established State CSA guidance, and/or best practices.
2. The revised, approved policy should be distributed to all CSA stakeholders.

CLIENT COMMENT

“Concur.”

Denise Gallop, CPMT Chair
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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. 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 City of Norfolk 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 Pamela Wong, CSA Coordinator during our on-site visit. Mrs. Wong'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,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Larry Filer, Norfolk City Manager
Christine Garczynski, CPMT Fiscal Agent
Pamela Wong, CSA Coordinator