



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

June 4, 2020

Ms. Cindy DeBusk, CPMT Chair
Nottoway County CSA Program
POB 103
Nottoway, VA 23995

RE: Nottoway County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 40-2020

Dear Ms. DeBusk,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2020, the Nottoway 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 March 2, 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 Nottoway County CSA program, our independent validation:

Concur Partially Concur Does Not Concur

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

The Nottoway County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. A summary of internal control weaknesses reported by the CPMT are included as an attachment to this report. While the CPMT reported internal control weaknesses, validation procedures of the locally prepared CSA Self-Assessment Workbook identified a significant internal control weakness not originally reported by the CPMT.

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 Nottoway County CSA Program are detailed in the table below.

SIGNIFICANT INTERNAL CONTROL WEAKNESS				
<p>Child and Adolescent Needs and Strengths (CANS) assessments were not always managed in accordance with established CSA policy and guidelines adopted by the State Executive Council regarding the frequency and validity of assessments for 40% (2 of 5) of client case records examined. Per CSA Policy 3.6.5, “the CANS assessment is required annually.” Further, the CANVaS 2.0 Individual Confidentiality and User Agreement states:</p> <p><i>“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. I understand that assessments which remain open after sixty days of the assessment date will be deleted from CANVaS 2.0 and cannot be retrieved.”</i></p> <p>While annual assessments were documented in the secure electronic database known as CANVaS 2.0, the assessments were not closed/completed within 60 days of the assessment date. The timing outlined in the assessment history also suggests that the entries may have been created in January 2020 rather than the assessment date listed (see examples below). Such discrepancies undermine the integrity, reliability, and validity of CANS assessment data that is used to inform State and local decision-making.</p>				
Client A				
ASSESSMENT REASON	ASSESSMENT STATUS	LOCALITY	START DATE	CLOSED DATE
Reassessment	CLOSED	Nottoway	03/12/2019	01/15/2020
Reassessment	CLOSED	Nottoway	03/07/2018	01/15/2020
Reassessment	CLOSED	Nottoway	01/15/2020	01/15/2020
Client B				
ASSESSMENT REASON	ASSESSMENT STATUS	LOCALITY	START DATE	CLOSED DATE
Reassessment	CLOSED	Nottoway	11/01/2019	01/23/2020
Reassessment	CLOSED	Nottoway	11/01/2018	01/24/2020
Reassessment	CLOSED	Nottoway	11/08/2017	01/24/2020

RECOMMENDATIONS

1. During service planning and/or utilization review activities, 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 ensure compliance with CSA statutes, policies, procedures etc. to include periodic review of client case files.

CLIENT COMMENT

“We appreciate the opportunity to give feedback and we are developing a plan of corrective action that will include a more stringent UR/UM process, CANS training for all those required to complete the CANS, and additional training opportunities and network meetings. We thank you for your support and your thoughtful consideration during this difficult time.”

The Office of Children’s Services respectfully requests that you submit a quality improvement plan addressing the observations detailed in this report 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 Nottoway 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 Hope Hodgson, CSA Coordinator during our on-site visit. Ms. Hodgson’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,



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Ronald E. Roark, Nottoway County Administrator
Katy Tomer, CPMT Fiscal Agent
Hope Hodgson, CSA Coordinator

Attachment



CSA Self-Assessment Validation
Nottoway County CSA Program Audit- SAV
Summary of Self-Reported Internal Control Weakness (Non-significant)

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date
Provide more in person network and training and include outcome and data reports. These have been identified and planned for in the Three Year Plan. Data and outcome reports have been shared with CPMT.	ARMICS ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	05/31/2020

¹ARMICS (Agency Risk Management and Internal Control Standards):

- Control Environment, Workforce Competence
- Information and Communication