



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 2, 2017

Mr. Eric Benson, CPMT Chair
Page County CSA Program
735 West Main Street
Luray, VA 22835

RE: Page County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 50-2015

Dear Mr. Benson,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Page 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 13, 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 Page County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Page County Community Policy and Management Team concluded that there were no significant non-compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified a deficiency 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 Page County CSA Program are detailed on page two (2) of this report.

SIGNIFICANT NON-COMPLIANCE OBSERVATION

1. Four (4) client case files were examined to validate conclusions reported by the Page 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: strengths, needs, discharge planning, goals/objectives, outcomes, parent signatures, etc.	75% (3 of 4)
Missing IFSP (treatment services beyond foster care maintenance)	25% (1 of 4)
Missing Child and Adolescent Needs and Strength (CANS) Assessments (initial, reassessments, annual, and/or discharge)	25% (1 of 4)
Evidence of client case specific utilization review	75% (3 of 4)
Vendor documents (i.e. treatment plans, progress notes, etc.)	75% (3 of 4)

2. The Page County CSA Program was reimbursed \$17,555.96 (state share) in Fiscal Years 2015 and 2016 where the CANS assessment and an IFSP were not completed as required. Use of state pool funds under these circumstances constitutes non-compliance with CSA statutory requirements governing FAPT referrals and access to pool funds, making it local government's responsibility for funding the purchased services. Criteria: COV § 2.2-5208, § 2.2-5209, § 2.2-5212

Client	Fiscal Year	Questionable Costs**
001	2015	\$15,505.92
001	2016	\$2,050.04
Total (State Share)		\$17,555.96

**Figures were based on client payment history reports.

RECOMMENDATION

- 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.
- Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding. Adequate documentation should be maintained as justification for CPMT funding decisions. The FAPT and CSA Coordinator should ensure that IFSPs and CANS assessments have been completed and verified prior to submitting funding requests to CPMT for authorization.
- The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, including whether the questioned costs will be voluntarily restored. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director of whether the identified actions are acceptable or any additional actions that may be required.


CLIENT COMMENT

Client comments are included in the attachment.

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 Page 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 Gray, CSA Coordinator during our on-site visit. Ms. Gray'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
Amity Moler, Page County Administrator/
CPMT Fiscal Agent
Linda Gray, CSA Coordinator
SEC Finance and Audit Committee

ATTACHMENT

Page County Community Policy and Management Team, 103 South Court Street, Luray, VA 22835

March 1, 2017

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

Mr. Scott Reiner, Executive Director
Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229-5008

RE: Page County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 50-2015

Dear Mr. Reiner and Ms. Bacote:

We are in receipt of the draft report of the self-assessment audit performed on April 13, 2016 by Stephanie S. Bacote, Program Audit Manager.

We would like to respond to the significant non-compliance observations:

- Individual Family Service Plans have been changed to include both long term goals, transition and discharge planning and an IFSP Summary to summarize what we are striving for. (Copy attached)
- A UR/UM review sheet is prepared at every FAPT meeting for clients. (Copy attached)
- A Participation and Consent form from FAPT meetings was changed to reflect parent participation and consent. (Copy attached)
- A CSA Documentation Inventory form has been implemented. (Copy attached).

All of the above items were implemented after Ms. Bacote was at the CSA office performing the audit.

In regards to the CSA program being reimbursed \$17,555.96 from the state; the CPMT is in agreement with the findings that CANS and IFSPs were not completed and retained as part of the client file as statutorily required. However, we would like to ask that the state not seek reimbursement of these funds as the client was an emergency removal case by the Page County Department of Social Services, client was in foster care from July, 2014 through July, 2015 as evidenced by the court order provided with this letter. All funds paid by the CSA office were for foster care, maintenance and day care for the client and were not in any way spent for other purposes other than sole maintenance for the client.

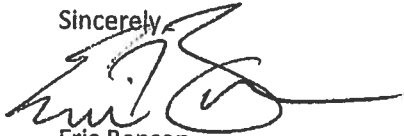
ATTACHMENT

The CSA Coordinator has been implementing appropriate procedures concerning documentation requirements; ensuring documentation is received before approval by CPMT and is adhering to all other rules, regulations and statutory requirements as she discovers changes need to be implemented.

We respectfully request that consideration of repayment of funds be reconsidered at this time. We appreciate the opportunity to submit the attached information in response to the draft audit.

Please let us know if there are any other items or information we can submit for review in this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Benson', with a long horizontal flourish extending to the right.

Eric Benson

Chairperson, Page County CPMT

cc: Amity Moler, Page County Administrator
Linda Gray, CSA Coordinator
Page County CPMT members