



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 16, 2017

Vicky Collins, CPMT Chair
City of Radford Children's Services Act Program
928 West Main Street
Radford, VA 24141

RE: City of Radford CSA Program Self-Assessment Validation, File No. 30-2015

Dear Ms. Collins,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2016, Radford 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 June 3, 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 City of Radford CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

Radford Community Policy and Management Team concluded that only non-significant 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 City of Radford CSA Program are detailed on page 2.

SIGNIFICANT NON-COMPLIANCE AND INTERNAL CONTROLS OBSERVATION

Expenditure reimbursements were requested and processed for payment for services where the requirements for compliance with State CSA policies and procedures were not met. Radford CSA program used CSA pool funds for a Medicaid funded service, treatment foster care- case management (TFC-CM) and did not seek authorization from the Department of Medicaid Services (DMAS) behavioral health administrative authorization vendor KePro (former vendor). Per the 2011 Appropriation Act, "Community Policy and Management Teams shall use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under the Children's Services Act. Effective July 1, 2009, pool funds shall not be spent for any service that can be funded through Medicaid for Medicaid-eligible children and youth except when Medicaid-funded services are unavailable or inappropriate for meeting the needs of a child." The total questioned cost for the review period totaled \$1,300.29 state share.

CRITERIA: *2011 Appropriation Act, Chapter 890, Item 274 E. CSA Policy Manual 4.4.2 Medicaid Funded Services*

RECOMMENDATION

- The CPMT should ensure full compliance with statutes regarding the use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under the Children's Service Act.
- The CPMT should ensure state pool funds are being maximized (i.e. all other available funding sources have been considered prior to uses of state pool funds attempted) to increase funding availability for services needs in the community.
- CPMT should submit a quality improvement plan, for review by the OCS Finance Office, to address whether the funds 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

See Attachment 1 for client comment

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observation outlined 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 City of Radford 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 Ms. Karen LaPlante, CSA Coordinator during our on-site visit. Her efforts enabled the audit staff to quickly 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
Program Auditor

cc: Scott Reiner, Executive Director
David Ridpath, City Manager
Patricia Cox, Fiscal Agent
Karen LaPlante, CSA Coordinator
Stephanie Bacote, Program Audit Manager
SEC Finance and Audit Committee

Attachment



RADFORD CITY DEPARTMENT OF SOCIAL SERVICES
928 WEST MAIN STREET
RADFORD, VIRGINIA 24141

March 15, 2017

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

Dear Ms. Larkin,

We received the City of Radford CSA Program Audit Self-Assessment Validation 49-2015 Draft Report. The Radford City Community Policy and Management Team met on March 2, 2017 and reviewed the draft report during the meeting. The members of the CPMT did appreciate the opportunity to provide an official response.

Upon further review, it appears that Braley and Thompson did request additional documentation in order to request payment for case management services on 4 of the 6 months in question. It does not appear that the information was submitted to Braley and Thompson as requested. During this time period, the sole foster care worker was managing 30 cases. While this is not an excuse, I wanted to provide a context for the environment in which this oversight took place. All participating professionals (FAPT, CPMT and the CSA Coordinator) believed they were supporting the best interest of the child to remain in the home with his sister and believed that KePRO had denied payment for case management services. At the time, there was no review of files and no proof of denial was requested. This situation has served as a valuable learning tool and the process will change moving forward.

The City of Radford Community Policy and Management Team is prepared to submit a quality improvement plan. However, after further research we realize that the finding will stand. Please advise regarding next steps.

We appreciate your assistance in this matter.

With kind regards,

Vicky Collins, MA, LPC

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Director, Radford City Department of Social Services

Chair, City of Radford Community Policy and Management Team