



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 27, 2018

Ms. Jennifer Parker, CPMT Chair
and CPMT Fiscal Agent
Rappahannock County CSA Program
PO Box 87
Washington, VA 22747

RE: Rappahannock County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 47-2018

Dear Ms. Parker,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the Rappahannock 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 May 29, 2018 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 Rappahannock County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Rappahannock County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified major deficiencies¹ 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 Rappahannock County CSA Program are detailed on pages two (2) through six (6).

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS
 and REPEAT OBSERVATIONS**

1. Membership of the CPMT and Family Assessment and Planning Team (FAPT) was not consistent with state and locally established requirements. The composition of the Rappahannock County FAPT does not include a parent representative in accordance with Code of Virginia (COV) §2.2-5207. The CPMT does not have a representative from the Department of Health as required by COV §2.2-5205. The absence of the parent representative and the Department of Health representatives impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community. This observation was also reported in the prior audit of the Rappahannock County CSA Program dated April 4, 2017. Criteria: COV §2.2-5200, §2.2-5205, and §2.2-5207

2. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with COV [§ 2.2-5206](#), items 6 and 13. CPMT monthly meeting minutes and accompanying reports did not evidence utilization management activities to include:

- A. review of local and statewide data provided in the management reports on the number of children placed out of state, demographics, types of services provided, duration of services, service expenditures, child and family outcomes, and performance measures.
- B. tracking the utilization and performance of residential placements using data and management reports to develop and implement strategies for returning children placed outside of the Commonwealth, preventing placements, and reducing lengths of stay in residential programs for children who can appropriately and effectively be served in their home, relatives homes, family-like setting, or their community.

This observation was also reported in the prior audit of the Rappahannock County CSA Program dated April 4, 2017

3. Five (5) client case files were examined to validate conclusions reported by the Rappahannock 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. This observation was also reported in the prior audit of the Rappahannock County CSA Program dated April 4, 2017.

EXCEPTION DESCRIPTION	ERROR RATE
Missing one or more key data elements from the Individual Family Services Plan (IFSP). Data elements included: strengths, needs, measurable goals/objectives, discharge plan, parent/guardian signature, and/or service end dates.	80% (4 of 5)

Criteria: COV§2.2-5208; CSA Policy Manual Section 3.5, Records Management and 4.1.2

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS
and REPEAT OBSERVATIONS - CONTINUED**

4. The Rappahannock County CSA Program was reimbursed \$5,954 (state share) in FY 2017 for expenditures incurred that did not meet compliance requirements of CSA. IFSPs did not document and CPMT's authorization of funding was not evidenced for community-based services provided to one (1) of the five (5) clients for the periods indicated below. Use of state pool funds under these circumstances constitutes non-compliance with CSA statutory requirements governing access to state pool funds. This observation was also reported in the prior audit of the Rappahannock County CSA Program dated April 4, 2017. Criteria: COV [§ 2.2-5206](#), §2.2-5208

SERVICE DESCRIPTION	FY 2017	TOTAL COST**
A. Mental Health Assessment	January 2017	\$891
B. Supervised Visitation	February 2017 – June 2017	\$1,337
C. Parent Mentoring	April 2017 – June 2017	\$3,840
D. Parent Coaching	January 2017-April 2017	\$1,468
Total		\$7,536
State Share		\$5,954
**Figures based on reports of client payment history and invoices.		

RECOMMENDATIONS

The Rappahannock County CPMT should take appropriate action to ensure that the non-compliance observations are addressed in the immediate future as follows:

- The CPMT should ensure that composition of the FAPT meets the minimum requirements established by CSA statutes. The CPMT should actively recruit to fill the vacancy. Documentation of recruitment efforts should be maintained.
- The CPMT should immediately initiate and going forward periodically review and analyze OCS financial and performance reports as required by CSA statute to demonstrate compliance. Management reports are available on the CSA website in the tab labeled "Statistics and Publications". See links below:
 - <http://www.csa.virginia.gov/OCSDData/ReportsPublications>
 - [State & Local CSA Performance Measures \(Excel Application\)](#)
 - [CSA Utilization Reports](#)
- The Rappahannock County CPMT should consider adding utilization management as a standing agenda item for their regularly scheduled CPMT meetings. The recorded minutes of the CPMT meeting should reflect a summary of CPMT's discussions and actions to be taken, if any. A copy of reports reviewed should be retained with the minutes.
- Prior to service planning, 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.

RECOMMENDATIONS CONTINUED

5. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding, to include matching the period services covered to the IFSP and documented authorization by the CPMT for the period services were incurred.
6. The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, including whether the CPMT agrees with the observations regarding questioned costs. 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 COMMENTS

See Attachment

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. 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 Rappahannock 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 Noelle Funk, CSA Coordinator during our on-site visit. Ms. Funk'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
Garrey W. Curry, Jr., Rappahannock County Administrator
Noelle Funk, CSA Coordinator
SEC Finance and Audit Committee

Attachment: Client Response

ATTACHMENT – CLIENT RESPONSE



RAPPAHANNOCK COUNTY
DEPARTMENT OF SOCIAL SERVICES

PO BOX 87

WASHINGTON, VIRGINIA 22747

540-675-3313 / FAX 540-675-3315

August 23, 2018

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

RE: Rappahannock County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 47-2018

Ms. Bacote:

Rappahannock County Community and Policy Management Team concurs with your findings of the Self-Assessment Workbook. We will submit a Quality Improvement Plan to address these concerns. With respect to the potential financial obligation, we plan to submit mitigating evidence along with our Quality Improvement Plan.

Thank you for your time.

Sincerely,

Noelle Funk
CSA Coordinator

Jennifer Parker
CPMT Chair