



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

December 5, 2024

Hope Mothershead, CPMT Chair  
Richmond County CSA Program  
5860 Richmond Road  
Warsaw, VA 22572

RE: Richmond County CSA Program Self-Assessment Validation (SAV)  
Final Report, File No. 036-2024

Dear Hope Mothershead,

Per the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2024, the Richmond County 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. Based on the review and examination of the self-assessment workbook and supporting documentation completed by the Richmond County CSA program on February 29, 2024, and covering the period November 1, 2022 through October 31, 2023, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

The Richmond County CPMT concluded that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services. The explanations for our assessment results are as follows:

***Validation procedures detected deficiencies indicating non-compliance by the local program and internal control weaknesses that the CPMT did not identify. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully following state law. An adequate system of internal controls is contingent upon the consistent and proper application of established policies and procedures and 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 of the Richmond County CSA Program are detailed on pages 2-3.***

Hope Mothershead, CPMT Chair

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS  
 AND INTERNAL CONTROL WEAKNESS**

**Observation 1:** Data irregularities were observed in the documentation of client service planning and funding decisions. At least one (1) exception was observed in three (3) of the five (5) client records examined to validate compliance. (state share). These errors undermine the reliability and integrity of data supporting the appropriateness of services funded and the accuracy of reported expenditure data. Notable non-compliance observations and internal control weaknesses are detailed below.

<b>Client File Review Exception Summary</b>	
<i>Criteria: COV 2.2 -5208; CSA Policy 3.5 Records Management; and CSA Policy 4.5. Fiscal Procedures</i>	
<b>Exception Rate</b>	<b>Description</b>
60% (3/5)	A. Service planning/Data Collection. Individual client records did not document evidence of utilization review monitoring/outcomes and discharge planning.
40% (2/5)	B. Financial Reporting/Data Integrity. The service name description for reported expenditure transactions was miscoded in financial reporting systems. Private Foster Care Support/Supervision/Administration (27) was incorrectly coded as Treatment Foster Care – Case Management (41).

**RECOMMENDATIONS**

1. FAPT and CPMT should ensure that utilization review activities are recorded for all clients. Following the established utilization review schedule and guidelines, documentation should capture progress or lack thereof with the recommended interventions.
2. Ensure all data fields on the service plan are filled (no blanks). Use the Model Individual and Family Services Plan (IFSP) and Utilization Review (UR) forms to record discharge planning and UR outcomes.
  - a. [Model IFSP](#)
  - b. [Model UR Form](#)
3. The CSA Coordinator and CPMT Fiscal Agent should establish month-end procedures to review fiscal transactions to ensure accurate reporting of service name descriptions and immediately correct identified errors.
4. Periodic case file reviews should be performed by someone other than the CSA Coordinator to establish quality control of client records and to ensure compliance with CSA statutory requirements.

### **SIGNIFICANT NON-COMPLIANCE OBSERVATIONS AND INTERNAL CONTROL WEAKNESS – REPEAT OBSERVATION**

**Observation 2:** CPMT monthly meeting minutes and accompanying reports did not evidence Continuous Quality Improvement/utilization review (CQI/UR) activities to include:

- A. Reviewing 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, child and family outcomes, and performance measures.
- B. Tracking the utilization and performance of 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, relative’s homes, family-like settings, or their community.

This observation was reported in the prior audit of the Richmond County CSA program dated July 17, 2019. A quality improvement plan was developed to address the deficiency, but it is not working as intended. CPMT, as the governing body, is responsible for ongoing monitoring of the QIP to ensure timely implementation of the plan and that the actions taken are continuously working as intended.

**Criteria:** COV [§ 2.2-5206](#) and [§ 2.2-3707](#)

### **RECOMMENDATIONS**

1. The CPMT minutes should document the outcome of CQI activities and report strategic planning progress. Utilization management tools and resources are available on the CSA website to support local program efforts to meet compliance requirements. Supporting documentation should be maintained with the recorded minutes. Use the template below at least annually to document CQI activities. Source data is available through the Data and Outcome Dashboard and CSA Utilization Reports.
  - a. [Strategic Planning Tools \(CQI\) Documentation Template with Instructions \(Download\)](#)
  - b. Data and Outcomes Dashboard  
(<https://csa.virginia.gov/Resources/CQIDashboardReport>)
  - c. CSA Utilization Reports  
(<https://csa.virginia.gov/Resources/ContinuousQualityImprovement>)
2. Supporting documentation should be maintained with the recorded minutes.

OCS respectfully requests that you submit a quality improvement plan (QIP) to address the observations in this report by thirty (30) days from the date of receipt of this report. In addition, we ask that you notify this office when the specified QIP tasks are completed. OCS will conduct a follow-up validation to ensure that quality improvements have been implemented as reported.

We thank the Richmond County Community Policy and Management Team, CSA staff, and partners for contributing to the CSA Self-Assessment Workbook. We also acknowledge Vanesa Livingstone, CPMT Fiscal Agent/CSA Coordinator, who provided excellent assistance and cooperation during our review. Ms. Livingstone's efforts enabled the audit staff to resolve any questions/concerns observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



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Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Vanesa Livingstone, CPMT Fiscal Agent/CSA Coordinator  
Katie Chilton, CSA Coordinator