



# COMMONWEALTH of VIRGINIA

## OFFICE OF CHILDREN'S SERVICES

*Administering the Children's Services Act*

Scott Reiner, M.S.  
Executive Director

May 21, 2020

Ms. Ginger Ploeger, CPMT Chair  
City of Virginia Beach, CSA Program  
3432 Virginia Beach Blvd.  
Virginia Beach, VA 23452

RE: City of Virginia Beach CSA Program Self-Assessment Validation, File No. 30-2020

Dear Ms. Ploeger:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2020, the City of Virginia Beach Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Services Act (CSA) Program. An on-site visit was scheduled and conducted by OCS Program Auditors on January 27, 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 City of Virginia Beach CSA program, our independent validation:

Concur

Partially Concur

Does Not Concur

with the conclusion reported by the City of Virginia Beach CPMT that significant non-compliance and/or weaknesses were found in the design or operation of internal controls applicable to the processes or services conducted on behalf of the City of Virginia Beach CSA program. A summary of significant non-compliance observations and/or internal control weaknesses reported by the Virginia Beach CPMT are included as attachment to this report. While the CPMT reported non-compliance and/or internal control weaknesses, validation procedures of the locally prepared CSA Self-Assessment Workbook identified additional deficiencies not originally reported by the CPMT. Specifics pertaining to the City of Virginia Beach CSA Program are detailed on page two (2).

**INTERNAL CONTROL WEAKNESSES**

Expenditure reporting errors were identified in two (2) of the five (5) client records examined. Expenditures incurred for CSA funded services were not properly reported in the correct expenditure category and/or service name description. The errors lessen the reliability and integrity of data used in CSA Pool Expenditure Reports and Utilization Reports. The specific exceptions are noted below.

1. Expenditure reporting category was misclassified for a transaction occurring in Fiscal Year 2019. This financial reporting error resulted in overpayment of \$353.36 local share.

Client	Service	Period	Incorrect Expense Category	Match Rate	Correct Expense Category	Match Rate	Total Expense	Local Share Overage
Client A	Case Support	10/01/18 - 12/31/18	RCC PA*	\$0.4461	CBS*	\$0.1784	\$ 1,320.00	\$ 353.36
*RCC PA-Residential Congregate Care-CSA Parental Agreement; *CBS- Community Based Services								

2. The service name description was not appropriately referenced indicating the service that was actually provided. This detail is provided in reports used to support continuous quality improvement monitoring efforts, which is dependent upon complete, accurate, and reliable data.

Client	Incorrect Service Name Code	Correct Service Name Code	Period
Client A	#24 Other	#4 Case Support	10/01/18 – 12/31/19
Client B	#24 Other	#4 Case Support	10/01/18 – 04/30/19

**CRITERIA:** Code of Virginia §2.2-5206, Department of Accounts (DOA) Agency Risk Management and Internal Control Standards (ARMICS), Control Activities.

**RECOMMENDATIONS**

The CSA Office and fiscal staff should periodically review completed financial reports to ensure transactions are accurately recorded in the appropriate expenditure categories and utilize the correct service name descriptions. Identified discrepancies should be immediately corrected.

**CLIENT COMMENTS**

“I concur with findings 1A and B above.

A. Locality is using Service Name Code: Other -24 in place of the correct service name code of case support 04 – CORRECTED. The Service Name Code Other - 24 was changed in Harmony on 3/3/20 to reflect the correct State Service Name Code of Case Support. To ensure that all Coding is correct, the CSA Accountant did a full review on 3/31/20. Going forward, the CSA Accountant will do a quarterly review of all the coding. The first quarterly review was done on 4/13/20.

B. Community Based Services were mis-classified as Residential Congregate Care services – CORRECTED. The Community Based Services service code was mis-classified as Residential Congregate. Care Services. The error was addressed with the finance staff and they were re-educated on selecting the correct codes on 3/3/20.”

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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 City of Virginia Beach 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. Becky China, CSA Coordinator and the CSA office staff, during our on-site visit. Their efforts enabled the audit staff to quickly resolve any questions and concerns observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Rendell R. Briggs, CAMS  
Program Auditor



Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Thomas Leahy, Acting Virginia Beach City Manager  
Dawn Rykheart, CPMT Fiscal Agent  
Becky China, CSA Coordinator

Attachment



**CSA Self-Assessment Validation**  
**Virginia Beach CSA Program Audit- SAV**  
**Summary of Self-Reported Significant Non-Compliance Observations**

<b>Observations</b>	<b>Criteria</b>	<b>Prior Audit Repeat Observation</b>	<b>Quality Improvement Plan Submitted</b>	<b>Quality Improvement Plan Action Date</b>
1. Submit to the Department of Behavioral Health and Developmental Services information on children under the age of 14 and adolescents ages 14 through 17 for whom an admission to an acute care psychiatric or residential treatment facility licensed pursuant to Article 2 (§ <a href="#">37.2-403</a> et seq.) of Chapter 4 of Title 37.2, exclusive of group homes, was sought but was unable to be obtained by the reporting entities.	<a href="#">§ 2.2-5206</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2020
2. Establish policies to assess the ability of parents or legal guardians to contribute financially to the cost of services to be provided and, when not specifically prohibited by federal or state law or regulation, provide for appropriate parental or legal guardian financial contribution, utilizing a standard sliding fee scale based upon ability to pay;	<a href="#">§ 2.2-5206</a> <a href="#">§ 2.2-5208</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	12/09/2019
3. Establish policies for providing intensive care coordination services for children who are at risk of entering, or are placed in, residential care through the Children's Services Act program, consistent with guidelines developed pursuant to subdivision D 22 of § <a href="#">2.2-2648</a> ;	<a href="#">§ 2.2-5206</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	01/22/2020
4. All public agencies that have served a family or treated a child referred to a family assessment and planning team shall cooperate with this team. The agency that refers a youth and family to the team shall be responsible for obtaining the consent required to share agency client information with the team.	<a href="#">§ 2.2-5210</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	11/13/2019



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5. Effective February 23, 2000, the CPMT shall consider the following criteria when determining whether parental contributions are appropriate: Parents of children in out-of-home placements should not be charged a payment for services in addition to the child support order. Instead, for out-of-home care, the CPMT shall implement existing state law and policy requiring referral of such cases to the Division of Child Support Enforcement (DCSE). The non-custodial parents of children in out-of-home care are to be referred to the DCSE for the collection of child support. (Statutory authority: COV §63.2-1910)	CSA Policy Manual Section 4.5.4 Parental Contributions for Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2020
6. <u>Comprehensive Services Records</u> . This series documents services to high-risk youth as part of the Comprehensive Services Act (CSA). This series may include, but is not limited to: counseling records, court ordered program placement, and payment for foster care. Code of Virginia 2.2-5206 and 2.2-5208. Series No. 000174 – Retain 3 years after last review then destroy in compliance with No. 8 on the schedule cover page.	Records Retention and Disposition Schedule GS-15, Social Services (Feb 2012)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	03/10/2020