

***CHILDREN'S SERVICES ACT
PROGRAM AUDIT***

York County

Audit Report No. 05-2019

January 17, 2019



Office of Children's Services
Empowering communities to serve youth

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EXECUTIVE SUMMARY


The Office of Children's Services (OCS) has completed an audit of the York County Children's Services Act (CSA) Program. The York County CSA Program provided services and/or funding for approximately 48 youth and families in Fiscal Year (FY) 2018. The audit included review and evaluation of management oversight, operational, and fiscal practices. Based upon established statewide CSA performance measures reported as of FY 2017, significant achievements for York County and the CSA Program were:

- the percentage of youth with a decrease in the Child and Adolescent Needs and Strengths Assessment (CANS) for school and behavioral/emotional needs domains exceeded the statewide average by 29% respectively; and
- the percentage of foster care youth in family-based placements increased by 15% from the previous fiscal year.

However, there are additional opportunities to effect quality improvement in other areas of the CSA Program. Our audit concluded that there were deficiencies in internal controls that could impact the effective and efficient use of resources, as well as compliance with statutory requirements. The following significant issues were identified:

- Expenditure reimbursements were requested and processed for payment of services where CANS assessments were not completed in accordance with CSA compliance requirements establishing frequency of administration. The total questioned costs equaled \$36,453 of which \$22,280.07 represented the state share.
- Membership of the Family Assessment Planning Team (FAPT) was not consistent with state and locally established requirements. The composition of members serving on the York County FAPT did not include a parent representative as required by the Code of Virginia (COV) 2.2-5207.
- Local CSA policies and procedures have not been documented governing Intensive Care Coordination (ICC) in accordance with Code of Virginia 2.2-5206.

The Office of Children's Services appreciates the cooperation and assistance provided on behalf of the York County CPMT and other CSA staff. Formal responses from the York County CPMT to the reported audit observations are included in the body of the full report.


Stephanie S. Bacote, CIGA
Program Audit Manager


Rendell R. Briggs, CAMS
Program Auditor

INTRODUCTION

The Office Children's Services (OCS) has completed a financial/compliance audit of the York County Children's Services Act (CSA) program. The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing (Standards). The Standards require planning and performance of the audit pursuant to stated audit objectives in order to provide a reasonable basis for audit observations, recommendations, and conclusions. The audit was completed on January 16, 2019 and covered the period October 1, 2017 through September 30, 2018.

The objectives of the audit were to:

- Determine whether adequate internal controls have been established and implemented over CSA expenditures.
- Determine the adequacy of training and technical assistance by assessing local government CSA staff knowledge and proficiency in implementing local CSA programs.
- Assess whether operations have maintained high standards for sound fiscal accountability and ensured responsible use of taxpayer funds by evaluating fiscal activities of local CSA programs.
- Assess the level of coordination among local government CSA stakeholders and efforts to improve CSA performance by evaluating local CSA program's operational and utilization review practices.
- Assess implementation of quality improvements addressing prior audit observations reported by OCS and/or identified in the prior self-assessment evaluation completed by the York County CPMT. The CSA program audit self-assessment validation was completed July 19, 2016.

The scope of our audit included all youth and their families who received CSA funded services during the audit period. Audit procedures performed included reviews of relevant laws, policies, procedures, and regulations; interviews with various CSA stakeholders; various tests and examination of records; and other audit procedures deemed necessary to meet the audit objectives.

BACKGROUND

Established in 1634, York County is located in Virginia's Tidewater region. According to published estimates by the Weldon Cooper Center for Public Service-University of Virginia, York County has a population estimate of 65,187 as of July 1, 2017. The U.S. Census Bureau, State and County Quick Facts reports the median household income from 2011-2016 as \$83,410.

The Children's Services Act (CSA) is a law enacted in 1993 that establishes a single state pool of funds to purchase services for eligible youth and their families. The state funds, combined with local community funds, are managed by local interagency teams, referred to as the Community Policy and Management Team (CPMT) who plan and oversee services to youth. The York County CPMT was established to comply with this statute. The CPMT is supported in this initiative by the Family Assessment and Planning Team (FAPT) responsible for recommending appropriate services. Administrative services are managed through the local CSA office staffed by a full-time CSA Coordinator. Expenditure and demographics for fiscal years 2015 to 2018 are depicted below:

**CSA Pool & Census Data by Fiscal Year for York County
(2015-2018)**

FY	Census	Census Change	Census % Change	Pool Expenditures	Expenditures \$ Change	Expenditures % Change	Unit Cost	Unit Cost % Change
2015	32	-1	-3%	\$830,869	-\$51,602	-6%	\$25,965	-3%
2016	35	3	9%	\$964,427	\$133,558	16%	\$27,555	6%
2017	37	2	6%	\$1,146,391	\$181,964	19%	\$30,984	12%
2018	48	11	30%	\$1,656,433	\$510,042	44%	\$34,509	11%

Note: Changes recorded for FY 2014 are based on differences from fiscal year 2013 to 2014.

FY	Pool Expenditures
2015	\$830,869
2016	\$964,427
2017	\$1,146,391
2018	\$1,656,433

FY	Census
2015	32
2016	35
2017	37
2018	48

FY	Unit Cost
2015	\$25,965
2016	\$27,555
2017	\$30,984
2018	\$34,509

OBSERVATIONS AND RECOMMENDATIONS

A) FISCAL ACTIVITIES

Observation #1	Criteria	Compliance and Internal Control
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Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with state and local CSA policies and procedures were not met. Exceptions were noted as follows:

Per Code of Virginia (COV) 2.2-5212, access to the state pool of funds includes the use of a uniform assessment instrument and process. The Child and Adolescent Needs and Strengths (CANS) Assessment is the approved uniform assessment instrument per CSA policy adopted in 2009. The CANS assessment is required initially, annually and upon discharge from the CSA process. A CANS was not completed timely for two (2) cases (25%) out of the eight (8) client case files examined, resulting in \$36,453 in questioned costs of which \$22,280.07 represents the state share. Refer to the table below for the breakdown of the client expenditures.

Client	Type (Initial or Annual)	Lapsed Period	Expenditure	Questioned Cost State Share
A	Annual	10/01/17 - 05/10/18	\$4,508.00	\$2,755.29
B	Annual	10/01/17 - 08/28/18	\$31,945.00	\$19,524.78
Total				\$22,280.07

The CANS assessment is an instrument to assist child-serving professionals in the planning and management of services to children and their families, by identifying the strengths and needs of the child and family. In addition, to service planning activities, CANS is used to measure progress and to identify the most commonly occurring needs and strengths at the individual, local, and statewide levels. The data collected is used to evaluate outcomes and to inform decision making at the state and local levels, which is dependent upon complete, accurate, and reliable information.

Recommendation

- Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding and other appropriate funding sources. Adequate documentation should be maintained as justification for CPMT funding decisions, such as, but not limited to, CANS (initial and annual) have been completed.
- 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 based on SEC approved Policy 4.7 Response to Audit Findings of whether the identified actions are acceptable or any additional actions may be required.

Client Comment

See Attachment (Client Response)

B) GOVERNANCE ACTIVITIES:

Observation #2

Criteria Compliance and Internal Control – Repeat Observation

Membership of the Family Assessment and Planning Team (FAPT) was not consistent with state and locally established requirements. The composition of members serving on the York County FAPT did not include a parent representative as required by the COV 2.2-5207. The absence of a parent representative was identified in the previous audit report dated July 19, 2016. CPMT minutes or other available documentation were insufficient in evidencing recruitment efforts during the audit period. After initiating this audit, the York County CPMT secured a parent representative for the FAPT effective November 1, 2018. The absence of the parent representative from the team responsible for service planning could potentially impede the achievement of the highest degree of multi-disciplinary collaboration ensuring family advocacy as service planning is contingent upon active participation by all required members.

Recommendation

The CPMT should ensure that the composition of the FAPT meets the minimum requirements as established by the COV and locally established policies and procedures. The CPMT minutes and applicable documentation should be retained to reflect all recruitment efforts and/or campaigns to secure CPMT/FAPT membership.

Client Comment

“It is noted that a Parent Representative was also listed our 2016 Audit, however, efforts have been made continuously to find a parent representative at the CSA level although documentation was not in the CPMT minutes of the recruitment efforts. Securing a parent representative has been a difficult process with the commitment of time and the type of cases that are reviewed by our FAPT Team. Currently, the York County FAPT meets the minimum requirements as established by COV. The locally established policies will note the minimum requirements for FAPT representation. In the future, CPMT minutes will reflect discussion notifying the CPMT of vacancies or potential vacancies and recruitment efforts on a monthly basis when a vacancy is noted. When potential candidates are secured; the minutes will reflect the CPMT discussion and potential approval of said candidate.”

Observation #3**Criteria****Compliance and Internal Control – Repeat Observation**

The York County CPMT has documented a formal local policy manual to govern the local CSA program as required. However, the CPMT has not established policies for providing Intensive Care Coordination (ICC) services for children who are at risk of entering, or are placed in, residential care through the CSA Program in accordance with the Code of Virginia 2.2-5206, Item #17. While a policy was not documented as required, ICC services were provided and/or funded in FY 2018 by York County CSA.

Recommendation

The CPMT should establish and document policies governing the provision of Intensive Care Coordination (ICC) services. The CPMT should periodically review and update the policy manual to ensure all required elements are present.

Client Comment

“York County CPMT and the Consortium CPMT have committed to adding an ICC policy into the CPMT/FAPT policies to be adopted in February 2019 and effective on March 1, 2019. A standing ICC MOA between Colonial Behavioral Health and York CPMT was submitted along with documents used to monitor and establish ICC services for York County cases. Although a specific policy was not included in the local policies as required; ICC services were provided following the OCS policies as identified on the state OCS website. As an identified grantee, York County CPMT was in compliance with the requirements of the Virginia’s System of Care Expansion and Sustainability Grant, which is awarded by the U.S. Substance Abuse and Mental Health Services Administration through DBHDS in its practice and procedures for ICC services. York County CPMT is proud to be the one grantee in our region that completed the first ICC case in the second year of the grant and effectively closed the case to CSA funded services with great success for the client and family. A majority of the funds used for York County ICC were reimbursed back to York County CSA through sustainability funds from the grant.”

CONCLUSION

Our audit concluded that there were deficiencies in compliance and internal controls over the York County CSA program. Conditions were identified that could impact the effectiveness and efficient use of resources as well as compliance with statutory requirements. An exit conference was conducted on January 16, 2018 to present the audit results to the York County CPMT. Persons in attendance representing York County CPMT were:

Ms. Kimberly Irvine, CPMT Chair, Director of York County Department of Social Services,
Mr. Rick Verilla, Assistant Director of York County Department of Social Services,
Ms. Amy Santiago, CPMT Fiscal Agent, York County Department of Social Services
Ms. Cynthia Bauer, CSA Coordinator, York County Department of Social Services, and
Ms. Tedra Collins, CSA Administration, York County Department of Social Services.

Representing the Office of Children's Services was: Rendell R. Briggs, Program Auditor. We would like to thank the York County CPMT and related CSA staff for their cooperation and assistance on this audit.

REPORT DISTRIBUTION

Scott Reiner, Executive Director
Office of Children's Services
Neil Morgan, York County Administrator
Kimberly Irvine, CPMT Chair
Amy Santiago, CPMT Fiscal Agent
Cynthia Bauer, CSA Coordinator
SEC Finance and Audit Committee

ATTACHMENT CLIENT RESPONSE

Quality Improvement Plan

York County CMPT

January 2019

Response to Audit No: 05-2019

Period 10/1/17-9/30/18

1. Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding and other appropriate funding sources. Adequate documentation should be maintained as justification for CPMT funding decisions, such as, but not limited to, CANS (initial and annual) have been completed.
 1. Two (2) Designated Super Users/Report Administrators have been assigned for York County. These DSU/RA are the CSA coordinator (Cynthia Bauer) and the CSA Administrative Assistant (Tedra Collins)
 2. The York County CSA had developed a spreadsheet of all CSA clients receiving funded services. These clients are now identified by dates of Initial CANS, reassessment CANS and Discharge CANS when appropriate. This spreadsheet is developed and monitored by the CSA Administrative Assistant (Tedra Collins). The purpose of this spreadsheet is to monitor that CANS are completed as required prior to funding being approved or invoices paid. The spreadsheet will encompass CANS from the date of January 1, 2017 to current date.
 3. York County Schools has designated one School Social Worker (Cathy Anthony) to monitor all CANS for School CSA cases. She is also a member of the York County FAPT team. She works collaboratively with the School Student Services personnel and the school staff to stay current on new and ongoing CSA funded students.
 4. On an ongoing basis (monthly/quarterly), the CSA Coordinator will utilize the CANS reports to monitor CANS submissions. The report results will be submitted to the CPMT chair. CanVaS 2.0 reports to be utilized to include the Open Assessment Report, Closed Assessment Report, Reassessment Report; Open 60 day Report; Individual Progress Report, Case Manager Assessment Report, and the Staff Certification Report.
 5. Prior to FAPT funding request recommendations being submitted to CPMT for approval; the CSA Coordinator will verify that all required CSA paperwork is completed to include but not limited to current initial or reassessment CANS.
 6. At the closing of a CSA case, the Case Manager will be notified, by CSA Coordinator to complete a Discharge CANS within five (5) business days of the case closing and last invoices paid.