

***COMPREHENSIVE SERVICES ACT  
PROGRAM AUDIT***

***Danville - Pittsylvania***

***Audit Report No. 21-2013***

***July 23, 2013***



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## EXECUTIVE SUMMARY

The Office of Comprehensive Services has completed an audit of the Danville–Pittsylvania Comprehensive Services Act for At Risk Youth and Families program. Our audit concluded that there were material weaknesses in internal controls, particularly in reference to governance and accountability of the \$6.36 million combine allocation for both localities of (state and local) funding. Conditions were identified that could adversely impact the effectiveness and efficient use of resources, as well as non-compliance with statutory requirements. The following significant issues were identified:

- The CPMB has not documented a formal plan to substantiate coordination of long-range planning that includes an assessment of the current risks, strengths and needs of the existing system, as well as establishing and documenting measurable criteria for evaluating the effectiveness of the local CSA program.
- Emergency placement and services policies, procedures, and guidelines established by the CPMB are in contradiction with the requirements of the Code of Virginia.
- Fiscal practices and procedures adopted by the CPMB needs strengthening to increase the operational effectiveness, specifically relating to lines of authority and responsibility, execution of transactions, and monitoring.

The Office of Comprehensive Services appreciates the cooperation and assistance provided on behalf of the Danville –Pittsylvania Community Policy and Management Board and other CSA staff. Formal responses from the Danville –Pittsylvania Community Policy and Management Board to the reported audit observations are included in the body of the full report.

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Stephanie S. Bacote, CIGA  
Program Auditor

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Program Auditor

## INTRODUCTION

The Office Comprehensive Services has completed a financial/compliance audit of the Danville City–Pittsylvania County’s Comprehensive Services Act for At-Risk Youth and Families program. The audit was conducted in accordance with generally accepted government 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 July 22, 2013 and covered the period January 1, 2012 through December 31, 2012.

The objectives of the audit were to:

- To determine whether adequate internal controls have been established and implemented over CSA expenditures.
- To determine the adequacy of training and technical assistance by assessing local government CSA staff knowledge and proficiency in implementing local CSA programs.
- To 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.
- To 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.

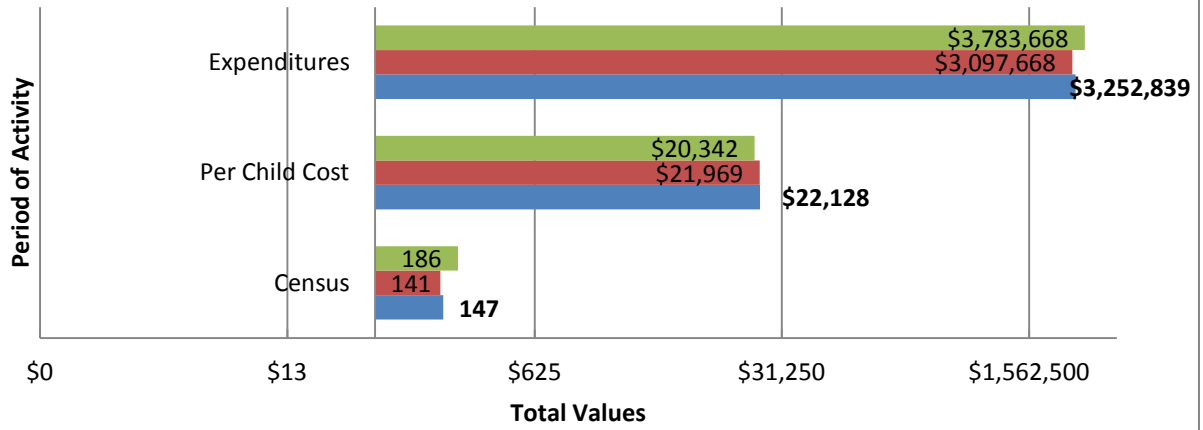
The scope of our audit included all youth and their families who received CSA funded services during calendar year 2012. Audit procedures performed included reviews of relevant laws, policies, procedure, and regulations; interviews with various CSA stakeholders; flowcharts of operational and fiscal processes; various tests and examination of records; and other audit procedures deemed necessary to meet the audit objectives.

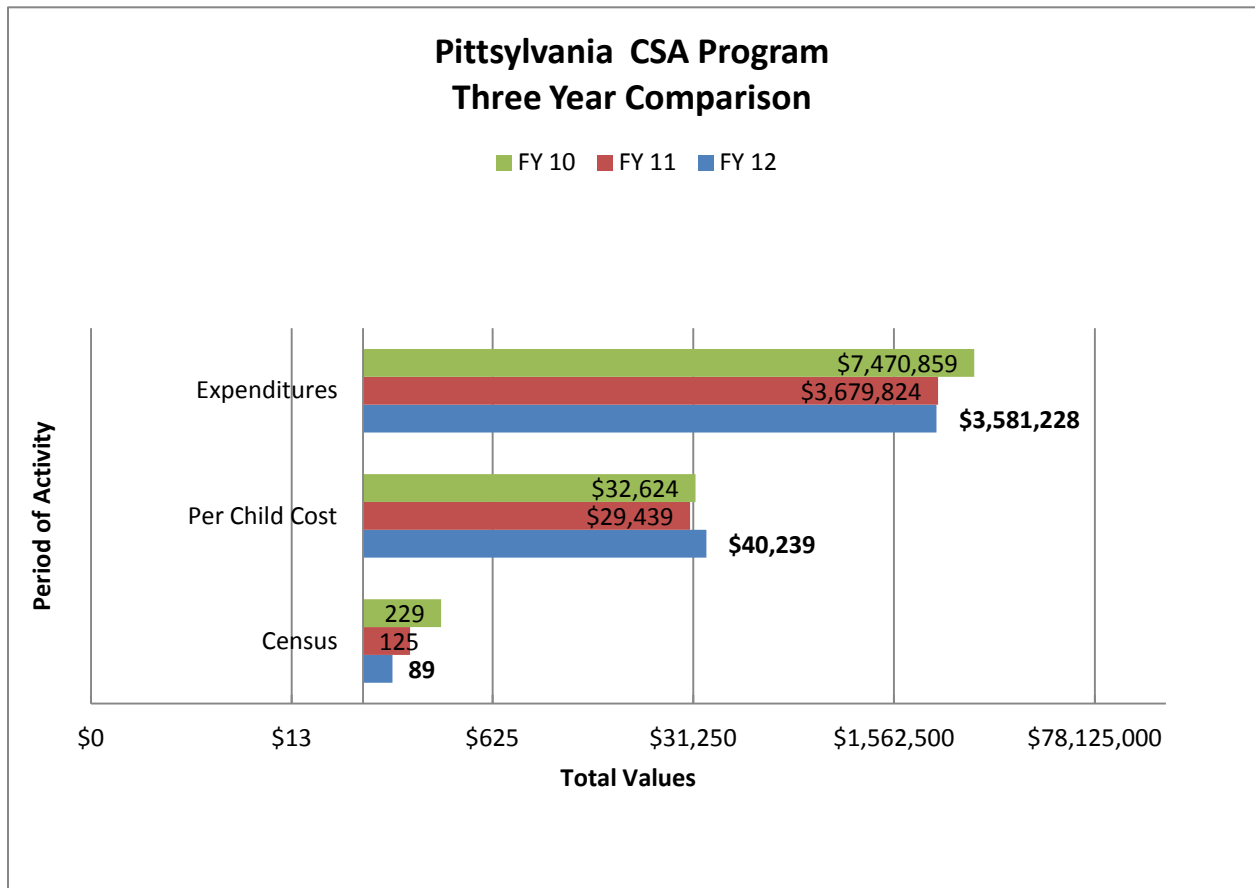
## **BACKGROUND**

The Comprehensive Services Act for At-Risk Youth and Families (CSA) is a law enacted in 1993 that establishes a single state pool of funds to purchase services for at-risk youth and their families. Of the approximate \$300 million appropriated by the Virginia General Assembly and local governments to fund CSA, the total combined state and local allocation for the Danville – Pittsylvania was \$6.36 million for fiscal year 2012 (Danville \$2.42 million and Pittsylvania \$3.94 million). The \$6.36 million was used to provide services to approximately 147 youths in the Danville City and 89 youth in Pittsylvania County. Based on reported figures for fiscal year 2012, the average per capita cost for CSA in the City of Danville \$75 and for Pittsylvania County is \$57. The total reimbursed cost for the city of Danville in FY 12 was 3.25 million and total reimbursed cost for the County of Pittsylvania in FY 12 was \$3.58 million. Danville has shown a reduction of 18% and 24% in expenditures and population served respectively between FY 2011 and FY 2010. Though expenditures and the population were on a downward trend, the unit cost per child had an increase of 8%. Between FY 2012 and FY2011, Danville experience slight increases in expenditures, population served and cost per child of 5%, 4% and 1% respectively. Conversely, Pittsylvania County has shown continual reduction in expenditures and population served since 2010. Expenditures have declined approximately 52%, while the population has been reduced by approximately 61%. Expenditure reduction in FY12 is partly attributed to the repayment agreement between OCS and Pittsylvania County, resulting from a 2010 audit conducted by the Auditor of Public Accounts. Though expenditures and the population are on a downward trend, the unit cost per child has increased 24%. The charts below depict a comparison for fiscal years 2010 through 2012 for each locality.

### Danville CSA Program Three Year Comparison

■ FY 10 ■ FY 11 ■ FY 12

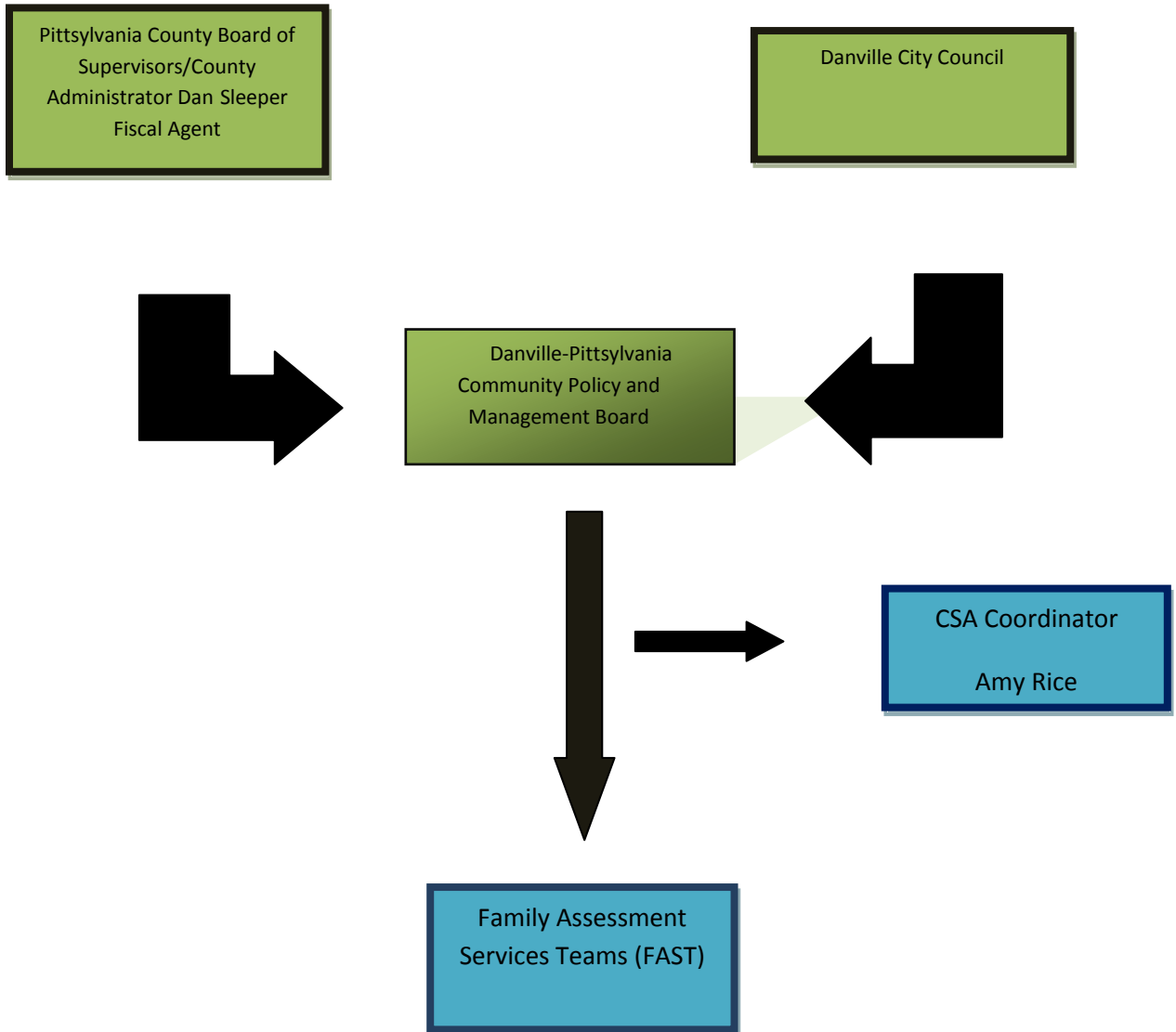




Source: CSA Website, Statewide Statistics, Pool Expenditure Reports (<http://www.csa.virginia.gov/publicstats/pool/localitybyyear.cfm>)

The state funds, combined with local community funds, are managed by local interagency teams, referred to as “Community Policy and Management Team (CPMT) who plan and oversee services to youth. The Danville –Pittsylvania Community Policy and Management Board (CPMB) was established to comply with this statute. The CPMB is supported in this initiative by two Family Assessment Services Teams (FAST) responsible for recommending appropriate services and through administrative support provided by the CSA Coordinator. The local management structure for the Danville –Pittsylvania is as follows:

*Danville-Pittsylvania Community Policy and Management Board Local Organizational Chart*



**NOTE:** Effective January 1, 2013, the City of Danville and Pittsylvania County dissolved the joint CPMB relationship and established separate community policy and management teams to represent their respective localities.



## **OBSERVATIONS AND RECOMMENDATIONS**

### **A) CPMB ADMINISTRATION**

Observation 1: The policies, procedures, and practices adopted by the CPMB (11-29-12) contain contradictory language to the Code of Virginia surrounding emergency services and placement. The policy circumvents FAPT process and the case worker makes the emergency placement or referral for services then the CPMB makes the decision regarding the appropriateness of the placement and/or service. The case does not go before FAPT within the required 14 days of placement. This practice weakens the intent of the collaborative effort of the FAPT or Multidisciplinary team in assessing families and recommending services to address the family's need(s).

Criteria: COV§2.2-509  
CSA Manual 3.1.5 Duties and Responsibilities  
DOA Agency Risk Management and Internal Control Standards, Control Activities

Recommendation: The CPMB for both localities should revise their emergency placement/service policy to align with the requirements of the Code of Virginia and OCS policies to ensure compliance with the applicable statutes.

Client Comments: Pittsylvania- "Please find the attached Policies and Procedures, page 27 has the 14 day policy add to our local policy. This policy was revised and adopted January 24, 2013". (See appendix)

Danville- "There is no information available to mitigate this finding; however a new D-CPMT Policy & Procedure Manual has been developed and will reflect statutory compliance, as it relates to OCS and the Code of Virginia."

Observation 2: Internal controls established by CSA statutes were not effectively implemented by the CPMB in order to safeguard against conflicts of

interest pertaining to the referral of services and approval of access to CSA pool funds by eligible youth and their families. One instance was observed that demonstrated that the established controls were not working as intended.

- Statement of Economic Interest Forms were not completed by Danville CPMB and FAST members that did not represent a public agency. In addition, the Danville-Pittsylvania CPMB did not verify that team members representing public agencies that were required to file such forms complied with the requirement.

The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds are significantly reduced, based on the increased opportunity for possibility that interest were not appropriately disclosed by required parties.

Criteria: COV Sections: § 2.2-3100; § 2.2-3101; § 2.2-3117; § 2.2-5205; COV § 2.2-5207;  
DOA Agency Risk Management and Internal Control Standards, Control Activities

Recommendation: The CPMB for the City of Danville and Pittsylvania County should ensure that the Statement of Economic Interests Form is completed immediately for all non-public participating members of the CPMB and FAST. Forms should be updated annually and retained in accordance with records retention procedures. In addition, both CPMB should identify public employees required to complete such forms and implement a process to confirm and document compliance with the requirement.

Client Comments: Pittsylvania- “The Pittsylvania County Community and Management Board adopted a March 28, 2013 policy in regards to the Statement of Economic Interest form. We currently have all required board members Statement of Economic Interest form.”

Danville- “There is no information available to mitigate the findings for FY12. To date, D-CPMT members and Alternates have Statements of Economic Interest and Confidentiality Statements on file. FAPT members have been provided with both documents.”

Observation 3: The CPMB has not documented a formal plan to substantiate coordination of long-range planning that includes an assessment of the current risks, strengths and needs of the existing system, as well as establishing and documenting measurable criteria for evaluating the effectiveness of the local CSA program. The ability and likelihood of the CPMB to adequately monitor and provide oversight of the local CSA program is an

essential component of organizational governance. The absence of formal planning, coordination, and program evaluation to ensure that the goals and objectives of the program are met ultimately impacts the CPMB efforts to better serve the needs of youth and families in the community and to maximize the use of state and community resources.

Criteria: [COV § 2.2-5206](#), Items 4, 6, and 13, CSA Manual 3.1.5 Duties and Responsibilities, Toolkit [Coordinated Long Range Planning](#)  
DOA Agency Risk Management and Internal Control Standards, Control Environment

Recommendation: As required by CSA statute, the City of Danville and Pittsylvania County CPMB must develop procedures for documenting long-range planning that ensures the development of resources and services needed by children and families in the City of Danville and Pittsylvania County communities. The process should include development of a formal risk assessment process and measurable criteria to be used for evaluating program effectiveness, including but not limited to: (1) 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, (2) preventing placements, and (3) reducing lengths of stay in residential programs for children who can appropriately and effectively be served in their home, relative's homes, family-like setting, or their community.

Client Comments: Pittsylvania – “The Pittsylvania County Community and Policy Management Board will develop procedures for 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 length of stay in residential programs for children. Our target date for completion is March 2014.”

Danville- “To date, the D-CPMT has begun the development of a strategic plan specific to the City of Danville and the needs of its constituents. There is no information available to mitigate the FY12 findings. Universal UR/UM Forms have been created to provide guidance and uniformity in UM/UR processes for agency case managers, as well as the CSA Coordinator.”

Observation 4: Opportunities exist for the CPMB to improve communication of the local CSA program’s philosophy, ethics, goals, objectives, and performance outcomes. While members of CPMB, FAST, and Case Managers that have been a part of the CSA program for an extended period of time understand the philosophy and goals of the CSA program, new members

are not well informed. A formal written philosophy, ethics statement, goals and objective will ensure all CSA stakeholders are aware and it will promote a consistent message of the CPMB. This information should be shared with community stakeholders and families to create greater awareness and understanding regarding accessibility to services, and also to demonstrate high standards for sound fiscal accountability and responsible use of taxpayer funds.

Criteria:

[COV § 2.2-5200](#)

CSA Manual Section 1, Items 4 through 6

CSA Manual Section 3.1.5.c, Toolkit [Family Engagement Policy adopted by SEC](#)

DOA Agency Risk Management and Internal Control Standards, Control Environment (Governance) and Control Activities (Monitoring)

Recommendation:

Since the Danville –Pittsylvania CPMB has split; this presents a great opportunity for both teams to implement a process to effectively communicate with youth, families, and community stakeholders to promote their local CSA programs and share information on accessing services, philosophy, ethics, goals, performance, etc. Actions to be considered that could be instituted immediately, if adopted, would include: (1) adopting the code of ethics established by the local governing body with reference made in the CPMT by-laws and or policies and procedures and (2) creating a webpage and/or brochure/handout that can be placed in the FAPT waiting room on days when FAPT meetings are scheduled. The same brochure can be distributed to participating agencies for dissemination when referring families to FAPT for services.

Client Comments:

Pittsylvania – “The Pittsylvania County Community and Management Board will assist the CSA office and coordinator in writing and approving a formal written philosophy, ethics statement, goals, and objectives to ensure that CSA stakeholders are aware and giving a consistent message to members. The board’s target date of completion is March 2014.”

Danville- “To date, the D-CPMT has created a mission statement specific to the City of Danville’s risk/needs assessment. There is no information available to mitigate the FY12 findings”

**B) PROGRAM ACTIVITIES**

Observation 5:

Based on inquiry of staff and review of case files it was determined that documentation of utilization management and utilization review (UM/UR) practices, policies and procedures was not evident in monitoring activities to assess the validity and effectiveness of the services purchased.

Danville- Pittsylvania has adopted a UR/UM Policy as of September 2012; however, staff informed the auditors that the policy had not been implemented which the auditors corroborated through the review of the cases files from both localities.

Criteria: COV § 2.2-2648 D.15  
COV § 2.2-5208 (5)  
2011 Appropriations Act, Chapter 890, Item 274 § B. 3.  
CSA Manual 8.1 and Toolkit “Utilization Management”  
Danville-Pittsylvania Community Policy and Management Board  
Utilization Management Plan September 2012

Recommendation: The City of Danville and Pittsylvania County should review the current policy and revise (as necessary) to fit the needs of their respective localities. The UM/UR policies and procedures should reflect at a minimum the requirements in the above stated guidelines to ensure compliance and efficiency of the local CSA program.

Client Comments: Pittsylvania –“It was noted that the CSA Coordinator did ask for guidance and training from the technical support staff during this timeframe with no response. The Pittsylvania County Community and Management Board will ask for assistance and implement a UM/UR practice, policy, and procedure with a target date of March 2014.”

Danville- “To date, the D-CPMT has created a UM/UR System which involves service provider visits for the purpose of facility assessment and utilization review of the client. UM/UR Forms have been created to provide guidance for the person completing the review. There is no information available to mitigate the FY12 findings.”

Observation 6: Individual and Family Service Plans (IFSPs) are not developed according to the locally adopted policy, which establish as documentation criteria: (1) identification of measurable short and long term goals, (2) time lines for period of service, (3) detailed information about the providers and costs of services, and (4) evidence of FAST, case manager and parent collaboration. Danville-Pittsylvania IFSP did not contain measurable short term and long terms goals to effectively monitor family progress in achieving the state goals and objectives.

Criteria: CSA Manual 3.2.5 FAPT Duties and Responsibilities  
CSA Manual 8.1 and Toolkit “Utilization Management”

Recommendation: The CPMB for both localities should establish a policy for the development of IFSPs that is consistent with CSA guidelines. The CPMB should ensure that local procedures are implemented and conduct periodic reviews to ensure compliance with their polices.

Client Comments: Pittsylvania- “The Pittsylvania County Community Policy and Management Board will instruct CSA coordinator to have yearly training with FAPT members and case managers to review the IFSP and the importance of the short and long term goals, time lines for period of service, detailed information about the providers and costs of services and evidence of FAST, case manager and parent collaboration. The Board will not approve IFSP without appropriate documentation after training. Training will be completed by March 2014”.

Danville- “Training will be implemented, beginning July 16<sup>th</sup>, for referring agency case managers, on how to create and devise measurable goals and objectives. In-Service Trainings will be held once per quarter for all CSA agencies and every other month for FAPT. An IFSP has been created to aid in addressing all statutory requirements associated with the development and content of the IFSP. Parent Satisfaction Surveys have been created to ensure parent involvement is tracked.”

Observation 7: Documentation of client case files requires strengthening to ensure compliance with program requirements. Fifteen case files were reviewed in the City of Danville and ten case files were reviewed in Pittsylvania County to confirm that documentation was maintained to validate that the FAPT process was administered appropriately. The results of the examination, identified opportunities for improvements as follows:

1. The CANS assessments were either missing or outdated, which is required in order to access pool funds. The table below depicts the estimated questioned cost associated with case files reviewed.

Locality	# of Exceptions	Period	Amount
Danville	4/15	1/1/12 – 12/31/12	\$11,778.75
Pittsylvania	2/10	1/1/12-12/31/12	\$11,205.00

2. Two (20%) of the cases reviewed in Pittsylvania County had missing or out dated consent to release information forms.
3. One (7%) case reviewed in Danville City assessed parental co-pay but there was no evidence that it was collected or subsequently waived by the CPMB. Additionally, there have been no parental co-pay collections reported by the City of Danville since FY 2009.

Criteria: Code of Virginia §2.2-5206  
 Code of Virginia § 2.2-2648 D.11  
 Code of Virginia § 2.2-5210  
 Code of Virginia § 2.2-2648.D.13  
 Code of Virginia § 2.2-5206 (3)

Recommendation: Danville City and Pittsylvania County should develop policies and procedures to ensure that all information is maintained in the client case file to document compliance with CSA Statutes and policies. Periodic review of the case file by the CSA Coordinator will aid in ensuring files are maintained with all required documentation. A resource that both localities can use is CSA Documentation Inventory Checklist. The CPMB for both localities should refund the state share of the cost for services paid without a valid CANS assessment for their respective localities.

Client Comments: Pittsylvania- “After reviewing the above cases for Pittsylvania County it was determined that the CANS were missed due to staff changes. The CSA office will continue to review and not approve cases without all appropriate documentation in the future.”

Danville- “DP-CPMB policy stated that parents would receive invoices regarding payment. This was not inclusive in any case files; therefore the Danville CSA Office has created invoices for parents and will submit monthly, as services are reported. If parents fail to pay within the specified timeframe, the account will be sent to the City Attorney’s Office for collection. CANS Assessments will be requested from case managers before the case reaches FAPT for review. This has been written into D-CPMT policy.”

Observation 8: Opportunities exist for both CPMB to improve their documentation efforts relating to Purchase of Service Orders (POS), FAST notes and IFSP to strengthen the ease of review of financial and programmatic records. We

observed 3 POS in Danville and 2 POS in Pittsylvania that were altered/or revised to increase funding levels; however, the same POS number was used.

In addition, FAST notes and IFSP lacked specificity regarding client progress in returning to a less restrictive environment. Case notes on the IFSPs were not always updated to match the recommended placement and/or service levels. We also observed instances where IFSPs were altered to reflect FAST meeting dates changes, dollars amount adjustments and period of services date changes. These changes were not initialed or dated to document who authorized the change(s) and when the change occurred. In addition, notes for the changes were not always documented on the IFSP. Such changes make it increasingly difficult to follow the chronology of the case events, which could lead the reviewer to draw inaccurate conclusions regarding the case.

Criteria: Code of Virginia Section 2.2-5209  
CSA Manual 3.2.5 FAST Duties and Responsibilities  
CSA Manual 3.1.5 CPMB Duties and Responsibilities

Recommendation: Both CPMB should develop minimum documentation policies and procedures surrounding POS, FAST notes, and IFSP to facilitate the review of fiscal and programmatic records. When changes to the original POS are deemed necessary, a new POS should be generated referencing back to the original as a revised PO or denote on the new POS as “version 2” with an explanation for the change. FAPT and IFSP notes should provide the details of the client’s progress in returning to a less restrictive environment, explanation for the recommended placement and/or services. In addition, the notes should be updated on each IFSP to agree to the recommended placement and/or services. Moreover, when there are several corrections needed on the IFSP a revised IFSP should be completed with an explanation for the changes. The original IFSP should be subsequently voided to avoid confusion.

Client Comments: Pittsylvania- “Pittsylvania County Community Policy and Management Board will develop minimum documentation policies and procedures surrounding POS, FAST notes, and IFSP’s to facilitate the review of fiscal and programmatic records. Our target date to complete this is March 2014.”

Danville- “On-going training will be provided on documentation and the importance of accuracy and precision of IFSPs and PSOs.”



## C) FISCAL ACTIVITIES

Observation 9: Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with local and State CSA policies and procedures were not met. Fiscal records reviewed indicated instances of procedural non-compliance and internal control weaknesses in reviews, approvals/authorizations, and documentation. Examples of the non-compliance and internal control weaknesses identified are below:

- Danville expended \$15 for “finger printing services” of a client’s grandmother that are not eligible for CSA funding. When the provided services are within an agency's scope of responsibility then CSA pool funds cannot be accessed.
- Payments for services not identified on the IFSP. Danville paid for transportation for a client’s relative. Although this may be an allowable expense, all services must be recommended by the FAPT as evident in the family’s IFSP. The total provided to the family member was \$50.00.
- Danville Social Services sought reimbursement for foster care expenditures that were not supported by case action form, receipts or an invoice. Expenditures for \$450.00 and \$68.91 were reimbursed payable to a miscellaneous vendor for two different cases. The auditor could not determine the services provided to the clients.

Criteria: COV § 2.2-5209; COV § 2.2-5211  
2011 Appropriations Act, Chapter 890, Item 274, § B.1.e.  
CSA Manual Section 2.1.3, Duties of the SEC Toolkit, Policies Regarding Denial of Funding to Local Governments (CPMBs) not in Compliance with Provisions of the Comprehensive Services Act for At-Risk Youth and Families (CSA)  
CSA Manual Section 3.1.5.b. Referrals to Family Assessment and Planning Teams  
CSA Manual Section 3.2.6. Access to Pool Funds from Community Policy & Management Teams  
CSA Manual Section 4.5.8, Fund Audit  
Danville-Pittsylvania Reimbursement Flow Procedures

Recommendation: CPMB for Danville should reimburse the Commonwealth for the state share for the above mentioned questioned cost. Both CPMB should ensure that current fiscal practices comply with statutory requirements

regarding allowable costs. Both CPMB should establish practices to periodically monitor fiscal transactions to ensure compliance.

Client Comments: Danville- Concur

Observation 10: Practices and procedures adopted by the CPMB for contracting and purchasing of services need strengthening to increase the operational effectiveness in terms of establishing clear lines of authority and responsibility, execution of transactions, and monitoring.

While reviewing contracts and POS, we observed that the CSA Coordinator is signing the contract as the locality representative and the POS as the CPMB representative. This presents an internal controls weakness in segregation of duties as the same person should not execute contracts and be responsible for the daily procurement activities. The CPMB should consider designating a member of the CPMB, preferably the chair, to sign the contracts and the CSA Coordinator to sign the POS.

Criteria: [COV § 2.2-5205](#) ; CSA Manual Section 3.1.2.b Agency Representatives. Danville-Pittsylvania CPMB Policies Procedures 9-10-12  
DOA Agency Risk Management and Internal Control Standards, Control Activities

Recommendation: Since Danville-Pittsylvania has separated, the two locality's CPMB should develop and adopt policies and procedures that align with the above best practices for proper internal controls. The individual boards should consider having the Board chair sign contracts and have the CSA Coordinator sign POS since this is a routine task.

Client Comments: Pittsylvania- "The Community Policy and Management Team became aware of this issue and have resolved it. All new contracts for the new year are signed by the Board Chair."

Danville- "On-going training will be provided on documentation and the importance of accuracy and precision of IFSPs and PSOs."

## CONCLUSION

Our audit concluded that there were material weaknesses in internal controls over the Danville – Pittsylvania’s CSA program, particularly in reference to governance and accountability of the \$6.36 million of allocated (state and local) funding. Conditions were identified pertaining to the management structure in place between January 1, 2012 –December 31, 2012, operating, and fiscal practices of the locally administered program that could adversely impact the effectiveness and efficient use of resources, as well as non-compliance with statutory requirements. An exit conference was conducted on July 8, 2013 to present the audit results to the Danville CPMT and Pittsylvania CPMT. Persons in attendance representing the Danville CPMT were Michelle Johnson, CPMT Chairperson Tammi Warren, CPMT Member, Danville, Debbie Mahan, Danville DSS and Lillie Jones, CSA Coordinator. Persons in attendance representing Pittsylvania CPMT were Sherry Flanagan CPMT Chairperson, William Sleeper, County Administrator/ CPMT Fiscal Agent and Kim Van der Hyde, Finance Director, Pittsylvania County. Representing the Office of Comprehensive Services was: Stephanie Bacote, Program Auditor and Annette Larkin, Program Auditor.

We would like to thank the Danville-Pittsylvania Policy and Management Team and related CSA staff for their cooperation and assistance on this audit.

## **REPORT DISTRIBUTION**

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Office of Comprehensive Services

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Sherry Flanagan, CPMT Chair  
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