



COMMONWEALTH of VIRGINIA

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

Scott Reiner, M.S.
Executive Director

August 2, 2019

Erik Robinson, CPMT Chair
285 South 6th Street
Wytheville, VA 24382

RE: Bland County CSA Program Self-Assessment Validation, File No.39-2019

Dear Mr. Robinson,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2019, the Bland 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. An on-site visit was scheduled and conducted by OCS Program Auditors on June 6, 2019 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 Bland County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

Validation procedures of the locally prepared CSA Self-Assessment Workbook identified a deficiency 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 Bland County CSA Program are detailed on page 2 through 3.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS – REPEAT

1. 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/utilization review (UM/UR) activities to include:
 - a. reviewing local and statewide data provided in the management reports on the number of children placed out of state, demographic, types of services provided, duration of services, services 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, relative's homes, family-like settings, or their community.

Utilization management is a key element in the Community Policy and Management Team's (CPMT) monitoring activities and assessing the appropriateness and effectiveness of services purchased, which is critical to ensure the CPMT is well informed when carrying out its decision-making responsibilities.

A quality improvement plan was submitted previously on April 7, 2017, in response to the audit report dated March 3, 2017. The submitted quality improvement plan (QIP) showed this task had been implemented and would continue quarterly. The purpose of a QIP is to ensure management take appropriate action to resolve deficiencies in a timely manner. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure the implementation of the plan and the actions taken are working as intended.

CRITERIA: COV § 2.2-5206, Items 4, 6, and 13, Agency Risk Management and Internal Control Standards, (ARMICS), Control Environment, Control Activities

2. Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Three (3) case files were reviewed by the auditor to confirm that required documentation was maintained in support of and to validate FAPT and/or multi-disciplinary team (MDT) referral, and CPMT funding decisions. The results of the examination identified opportunities for improvements. All three of the cases files examined omitted documentation to demonstrate compliance with CSA requirements key to the coordination and service planning by FAPT. Data omitted from case files reviewed were discharge Child and Adolescent Needs and Strengths assessments (CANS) (1 eligible case) and individual services plans were missing required data elements such as child and family strengths, measurable goals and objectives, and strategies (2 cases).

Insufficient data collection and poor document management in service planning may affect efficiency and effectiveness of the local program. Further, this condition fosters an environment that makes the program more susceptible to potential loss of accessibility to State funding in support of local programs as a result of non-compliance with CSA statutes regarding service planning and access to pool funds.

CRITERIA: COV § 2.2-5208, CSA Policy Manual 3.6 Mandatory Uniform Assessment Instrument (*Adopted December 18, 2007, Revised December 13, 2018*); CSA Policy Manual 3.5 Records Management (*Adopted August 28, 1998*)

RECOMMENDATIONS

1. The CPMT should review and analyze data in management reports provided by OCS at least annually and provide this information to all stakeholders. To aid this effort, OCS recently developed a dashboard to assist localities in developing Continuous Quality Improvement (CQI) activities. Below is a link to the dashboard as well as training material and instructions.

<https://www.csa.virginia.gov/Resources/ContinuousQualityImprovement>

2. The CPMT should ensure that a IFSP data elements necessary for service planning are present in all service plans such as child and family strengths, measurable goals and objectives and strategies. The CPMT should periodically perform a quality assurance review on case files to ensure they are complete.
3. The CPMT and the FAPT should ensure that CANS assessments (initial, re-assessment and discharge) are completed in CANVaS and maintained in client records.

CLIENT COMMENT

1. "In response to the first finding listed above, the Bland County CPMT will annually review local and statewide data mentioned above on a quarterly basis. Thus, that data will be reviewed at the July, October, January, and April meetings. Since the July meeting has already passed for fiscal year 2020, the CPMT will review the data at its next regularly scheduled meeting in August.

In regard to tracking the utilization and performance of residential placements with the goal of 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 is a practice that is regularly conducted by the CPMT when making placement decisions, however, the CPMT has not always included that information in the meeting minutes. Moving forward, the CPMT will make sure that every effort is used to track the utilization and performance of residential placements."

2. "In response to the second finding, the CSA Coordinator has reviewed the model service plan on the OCS website and will make a formal recommendation to the CPMT to adopt the new service plan going forward. In addition, the CPMT will perform a quality assurance review on case files quarterly to ensure data elements on the service plan are included and CANS assessment have been completed.

On behalf of the Bland County CPMT, thank you again for the recent review and hopefully, our corrective action moving forward will meet with your satisfaction."

The CPMT has submitted a complete and satisfactory quality improvement plan addressing all observations, which included tasks, responsible parties, and target completion dates. OCS Program Auditors conducted a follow-up of the quality improvement plan and determined that tasks identified have been implemented.

Erik Robinson, CPMT Chair
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We would like to thank the Bland County 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 Linda Miller, CSA Coordinator during our on-site visit. Ms. Miller's efforts enabled the audit staff to resolve quickly any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Dr. Eric Workman, Bland County Administrator
and Fiscal Agent
Linda Miller, CSA Coordinator
Stephanie Bacote, Program Audit Manager