



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

September 5, 2019

F. Woodrow Harris, CPMT Chair
Brunswick County CSA Program
401-B South Main Street
Emporia, VA 23847

RE: Brunswick County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 43-2019

Dear Mr. Harris,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Brunswick County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local CSA Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 17, 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 Brunswick County CSA program, our independent validation:

Concur Partially Concur Does Not Concur

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

The Brunswick County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified deficiencies indicating non-compliance with the statutory requirements of CSA. This is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Brunswick County CSA Program are detailed on page two.

SIGNIFICANT NON-COMPLIANCE – REPEAT OBSERVATION

1. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with Code of Virginia (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. review of local and statewide data provided in the management reports on the number of children served, children placed out of state, demographics, types of services provided, duration of services, service 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, relatives homes, family-like setting, or their community.

The non-compliance observation referenced in this report was also identified in the prior audit report issued March 2, 2017. The Brunswick County CPMT submitted a quality improvement plan with June 1, 2017 as the target date for completion. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure timely implementation of the plan and that the actions taken are continuously working as intended.

RECOMMENDATIONS

The Brunswick County CPMT should immediately initiate and going forward periodically review OCS financial and performance reports depicting local and statewide data as required by CSA statute to demonstrate compliance. Tools to effect a continuous quality improvement process (i.e utilization management) are available on the CSA website and listed below for your convenience.

- [CQI Dashboard](#)
 - [CQI Dashboard Instructions Manual](#)
- [CQI Dashboard Codes](#)
- [CQI Documentation Template with Instructions \(Download\)](#)
- [CQI Terms and Definitions](#)
- [CQI Training](#)

CLIENT COMMENTS

“Brunswick CSA continues to provide services only to mandated cases, lessening the impact of this item to local and state expenditures. Additionally, Brunswick has very few cases in residential placements historically.”

“Brunswick CPMT has initiated quarterly review of data available from the OCS with the 8/28/19 Brunswick CPMT meeting. The items reviewed were included in the agenda packet and will be included in the minutes of the meeting. The Brunswick CPMT Chair has attended OCS Continuous Quality Improvement training and is familiar with dashboard functionality and use.”

SIGNIFICANT NON-COMPLIANCE OBSERVATION

2. The CPMT does not meet membership requirements as established by Code of Virginia (COV) [§ 2.2-5205](#). The CPMT does not include a local elected or appointed official. There was no documentation available to evidence local efforts to fill vacant roles. The absence of the local elected or appointed official impedes the intent of CSA to create a collaborative system of services and funding that includes representation by all public officials, including the local governing authority, responsible for implementation of the Children’s Services Act. On July 10, 2019, Brunswick County CSA Office provided notification that a local government representative has been appointed to the CPMT.

3. Non-public representatives serving on the Brunswick County CPMT and Family Assessment and Planning Team (FAPT) did not complete the Statement of Economic Interest forms as required by COV [§ 2.2-5205](#) and [§ 2.2-5207](#). The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds may be reduced based on the increased possibility that required parties may not have appropriately disclosed personal interests. On July 10, 2019, Brunswick County CSA Office provided notification that the required forms have since been completed by the applicable parties.

4. Six client case files were examined to validate conclusions reported by the Brunswick County CPMT. The results of that review indicate improvement is needed in the pertaining to disbursement of CSA pool funds, which resulted in the request and reimbursement of \$1,531 (state share) in fiscal years 2018 for expenditures incurred that did not meet compliance requirements of CSA. The exception noted in the table below is deemed significant, as it is critical to evidencing compliance with CSA funding requirements.

Client File Review Exception Summary and Detailed Cost Breakdown				
Exception Rate	Description			
17% (1 of 6)	FAPT referral and assessment not completed within 14 days of placement. (COV § 2.2-5209)			
Client #	Service Description	Period	Total	State Share
003	Congregate Care Education	11/17 – 12/17	\$2,025	\$1,531

RECOMMENDATIONS

1. The CPMT should ensure that composition of the CPMT meets the minimum requirements established by CSA statutes. The CPMT should actively recruit to fill the vacancies. Documentation of recruitment efforts should be maintained.

2. The CPMT should ensure that the Statement of Economic Interest Form is completed immediately upon appointment for all required participating members serving on CPMT, and maintain filing in accordance with OCS Administrative Memo #18-02 [Statement of Economic Interest Filings for FAPT and CPMT Members](#).

3. The CSA Coordinator and the FAPT should ensure that minimum documentation requirements are met and correspondence is maintained in the client case file or readily accessible in order to substantiate services recommended to CPMT for funding authorization, to include timely referral and assessment by FAPT for emergency placements.

RECOMMENDATIONS CONTINUED

4. Someone other than the CSA Coordinator should perform periodic case reviews to establish quality control of client records and to ensure compliance with CSA Policy and statutory requirements. As a component of the quality control process, the CPMT should consider incorporating use of the [CSA Documentation Inventory](#), which is available on the CSA website.
5. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding and use of alternate funding sources where eligible and appropriate.
6. 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 that may be required.

CLIENT COMMENTS

1. "As acknowledged by the OCS Auditor, in the above paragraph, Brunswick County's Treasurer has agreed to continue serving on Brunswick CPMT, even though she no longer is the supervising entity for the CSA Coordinator."
2. As acknowledged by the OCS Auditor, in the above paragraph, completion of the required SEI forms has been done. This has been a challenge for CSA operations statewide for a number of years, given the volunteer nature of the service provided by parent and private provider reps.
3. "Brunswick CPMT is unclear as to what the exact nature of the problem cited by the Audit Manager is. The text of the draft report states that there was no FAPT referral and placement within 14 days of placement. The FAPT meeting was held on 11/8, with the placement effected by 11/22/18. The Audit Manager also raised concerns over use of the language in the last line of the quoted section above from the FAPT minutes, which stated "During Thanksgiving week, this child was placed in emergency residential at Newport News Behavioral Health." The particular concern was over the use of the term 'emergency residential.' This was simply the descriptive term used by Newport News Behavioral Health and was repeated at the FAPT meeting."

"Brunswick CPMT respectfully requests review of this item by the OCS Director, and additional information if it is determined that Brunswick CSA handled this case inappropriately."

"Brunswick CPMT would also like to thank the Audit Manager for her assistance and professionalism throughout and following the audit."

Mr. Woodrow Harris, CPMT Chair

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

Sincerely,



Stephanie S. Bacote, CIGA

Program Audit Manager

cc: Scott Reiner, Executive Director

Charlette T. Woolridge, Brunswick County Administrator

Debbie Burkett, CPMT Fiscal Agent

Linda Townsend, CSA Coordinator