

# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S. Executive Director

#### OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

July 1, 2019

Ms. Emily Hogge, CPMT Chair Buckingham County CSA Program 1184 High School Rd. Buckingham, VA 23921

RE: Buckingham County Children's Services Act (CSA) Program Audit

Self-Assessment Validation, File No. 29-2019

Dear Ms. Hogge,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Buckingham 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 February 29, 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 Buckingham County CSA program, our independent validation:

Concurs	Partially Concurs	☐ Does Not Concur
with the conclusion:	reported by the Buckingham County Cl	PMT that no significant observations
of non-compliance a	nd/or internal control weaknesses were	identified in the design or operation
of the processes or s	ervices conducted on behalf of Bucking	gham County CSA. The explanation
for our assessment re	esults are as follows:	

The Buckingham 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 a deficiency 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 Buckingham County CSA Program are detailed on page two (2).

## SIGNIFICANT NON-COMPLIANCE OBSERVATION

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.

#### RECOMMENDATIONS

The Buckingham 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
- COI Dashboard Codes
- CQI Documentation Template with Instructions (Download)
- COI Terms and Definitions
- CQI Training

## **CLIENT COMMENTS**

"The CPMT met on June 20th and reviewed the draft audit report. Moving forward, we plan to implement the following actions as a team:

- Train on the use of Continuous Quality Improvement (CQI) --over the course of 6 months beginning in August
- Start using CQI once all training is completed and then use quarterly during CPMT meetings
- Train on CSA policies and procedures using e-learning modules and other resources as identified by the CPMT
- Download, review and use the CSA user guide continuously throughout the year."

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The Buckingham County CPMT has submitted a quality improvement plan as requested by the Office of Children's Services. 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 Buckingham 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 Karen Frable-Moss, CSA Coordinator during our on-site visit. Ms. Frable-Moss' 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 Rebecca S. Carter, Buckingham County Administrator Karl Carter, CPMT Fiscal Agent Karen Frable-Moss, CSA Coordinator