



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

August 27, 2019

Ms. Kaki Dimock, CPMT Chair  
City of Charlottesville CSA Program  
P. O. Box 297  
Charlottesville, VA 22902

RE: City of Charlottesville Children's Services Act (CSA) Program Audit  
Self-Assessment Validation, File No. 30-2019

Dear Ms. Dimock,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the City of Charlottesville 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 11, 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 City of Charlottesville CSA program, our independent validation:

Concur

Partially Concur

Does Not Concur

with the conclusion reported by the Charlottesville 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 Charlottesville CSA. The explanation for our assessment results is as follows:

***The Charlottesville CPMT concluded that there were no significant non-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 City of Charlottesville CSA Program are detailed on pages two and three of this report.***

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS**

1. Membership of the CPMT was not consistent with state and locally established requirements during the period of review. The CPMT does not have a private provider representative in accordance with Code of Virginia (COV) [§ 2.2-5205](#). However, a private provider representative serves as a member of the Family Assessment and Planning Team (FAPT). The role of private provider is optional for FAPT. The absence of the private provider representative impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community. The CPMT would have met the Children’s Services Act compliance requirements regarding the private provider representative had they elected to have the private provider serving on the FAPT appointed to CPMT instead.
2. Ten (10) client case files were examined to validate conclusions reported by the by Charlottesville 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 \$803 (state share) in fiscal year 2018 for expenditures incurred that did not meet compliance requirements of CSA. The state share of expenditures have been reimbursed for one client as of April 2019. Thus, the remaining state share of questioned cost is \$409. Exceptions as noted in the table below are deemed significant, as they are critical to evidencing compliance with CSA funding requirements.

**Client File Review Exception Summary and Detailed Cost Breakdown**

Exception Rate	Description					
20 (2 of 10)	1. Pool funds were expended where other funding sources were available, such as Medicaid and Title IV-E. (COV <a href="#">§ 2.2-5211</a> and <a href="#">Chapter 836, 2017 General Assembly Session</a> ).					
10% (1 of 10)	2. An initial Child and Adolescent Needs and Strengths (CANS) assessment was not completed. (COV <a href="#">§ 2.2-5212</a> )					
Client #	Exception	Service Description	Period	Total	State Share	Reimbursed April 2019
18	2	Community-based	Feb-Jun'18	\$320	\$270	\$0
44	1	Treatment Foster Care Case Management (Medicaid Eligible)	Oct-Nov'17	\$200	\$139	\$0
48	1	Foster Care Maintenance – Clothing (Title IV-E Eligible)	May '18	\$465	\$394	\$394
				\$985	\$803	\$394
<b>NET QUESTIONED COSTS</b>				<b>\$409</b>		

### RECOMMENDATIONS

1. The Charlottesville CPMT should ensure that composition of the CPMT meets the minimum requirements established by CSA statute. The CPMT should actively recruit to fill vacancies when they occur. Documentation of recruitment efforts should be maintained.
2. Prior to service planning, the CSA Coordinator and the FAPT should ensure that minimum documentation requirements, to include required CANS assessments, 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. 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.
3. 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.
4. 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 of whether the identified actions are acceptable or any additional actions that may be required.

### CLIENT COMMENTS

See Attachment

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. 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 City of Charlottesville 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 Katie Ralston, CSA Coordinator during our on-site visit. Ms. Ralston'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  
Dr. Tarron J. Richardson, Charlottesville City Manager  
Charles Philippin, CPMT Fiscal Agent  
Katie Ralston, CSA Coordinator

# ATTACHMENT – CLIENT COMMENTS



## Charlottesville CPMT



### VISION:

Children live safely and productively with their families and in their schools and communities

August 23, 2019

Stephanie S. Bacote  
Commonwealth of Virginia  
Office of Children's Services  
1604 Santa Rosa Road, Suite 137  
Richmond, VA 23229

Dear Ms. Bacote:

We are in receipt of the City of Charlottesville Children's Services Act (CSA) Program Audit Self-Assessment Validation, File No. 30-2019, report sent on July 19, 2019. We appreciate the effort and feedback on our performance.

As you are aware, the Charlottesville CPMT has actively addressed the non-compliance observations identified during its CSA Self-Assessment and subsequent validation review conducted by OCS. Information on our response to these issues was included in the CPMT's Self-Assessment documentation and will be in the CPMT's quality improvement plan as well. The Charlottesville CPMT is pleased to report formal CPMT membership of a local private provider as of the July 2019 meeting. In addition, proactive steps have been taken to ensure documentation requirements are met for all CSA cases and CSA expenditures are both allowable and appropriate.

Thank you very much.

Sincerely,

Kaki Dimock  
CPMT Chair

### CORE VALUES:

**CONNECTED.**  
Young people thrive with caring adults and families

**ENGAGED.**  
Families and young people are engaged in decisions about their care

**PRODUCTIVE.**  
Services are meaningful and responsive to children's needs

**LOCAL.** Children are best served in their home communities