



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 28, 2019

Mr. Brian Stanley, CPMT Chair
Dickenson County CSA Program
334 Brush Creek Road
Clintwood, VA 24228

RE: Dickenson County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 23-2019

Dear Mr. Stanley,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Dickenson 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 December 18, 2018 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 Dickenson County CSA program, our independent validation:

Concur

Partially Concur

Does Not Concur

with the conclusion reported by the Dickenson 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 Dickenson County CSA. The explanation for our assessment results are as follows:

The Dickenson 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 Dickenson County CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. Membership of the CPMT and Family Assessment and Planning Team (FAPT) was not consistent with state and locally established requirements. Specific concerns noted were:
 - A. The CPMT and FAPT do not have designated parent representatives as required by Code of Virginia (COV) [§ 2.2-5205](#) and [§ 2.2-5207](#). A parent representative was appointed to FAPT. However, the FAPT parent representative attended only one FAPT meeting during the fiscal year that ended June 30, 2018.
 - B. The CPMT does not have a private provider representative in accordance with COV [§ 2.2-5205](#). However, a private provider representative is a member of the FAPT. The role of private provider is optional for FAPT.

The absence of the parent and private provider representatives impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community. There was no documentation available to evidence local efforts to fill vacant roles. In addition, the CPMT would have met compliance requirements regarding the private provider representative had the private provider serving on the FAPT been appointed to CPMT.

On January 28, 2019, Dickenson County CSA Office provided notification that a parent representative has been appointed to the FAPT and a private provider representative has been appointed to the CPMT.

2. 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.
3. Non-public representatives serving on the Dickenson County FAPT did not complete the Statement of Economic Interest forms as required by COV [§ 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 January 28, 2019, Dickenson County CSA Office provided notification the required forms have since been completed by the applicable parties.

RECOMMENDATIONS

The Dickenson County CPMT should take appropriate action to ensure that the non-compliance observations are addressed in the immediate future as follows:

1. The CPMT should ensure that composition of the CPMT and FAPT 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 Dickenson County CPMT should immediately initiate and going forward periodically review of OCS financial and performance reports as required by CSA statute to demonstrate compliance. Management reports are available on the CSA website in the tab labeled "Statistics and Publications". See links below:
 - o <http://www.csa.virginia.gov/OCSDData/ReportsPublications>
 - o [State & Local CSA Performance Measures \(Excel Application\)](#)
 - o **CSA Utilization Reports**
3. The CPMT should ensure that the Statement of Economic Interest Form is completed immediately for all required participating members serving on the FAPT.

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 Dickenson 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 Ambra Deel, CSA Coordinator during our on-site visit. Ms. Deel'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, CIQA
Program Audit Manager

cc: Scott Reiner, Executive Director
G. David Moore, Jr., Dickenson County Executive
Susan B. Mullins, CPMT Fiscal Agent
Ambra Deel, CSA Coordinator