



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

August 31, 2018

Ms. Katie Heritage, CPMT Chair  
Fauquier County CSA Program  
10 Hotel Street  
Warrenton, VA 20186

RE: Fauquier County Children's Services Act (CSA) Program Audit  
Self-Assessment Validation, File No. 37-2018

Dear Ms. Heritage,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the Fauquier 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 29, 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 Fauquier County CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

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

***The Fauquier 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 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 Fauquier County CSA Program are detailed on pages two (2) through four (4).***

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS**

1. The CPMT has not documented a formal plan to substantiate coordination of long-range, community-wide planning as required by COV [§ 2.2-5206](#), item 4.
2. The Fauquier County CSA Program was reimbursed \$59,059 (state share) in FY 2017 for expenditures incurred that did not meet compliance requirements of CSA. A Child and Adolescent Needs and Strengths (CANS) is required initially, annually, and upon discharge of CSA funded service. The data collected is used to evaluate outcomes and to inform decision-making at the state and local level. For three (3) of ten (10) client files reviewed, an initial and/or annual comprehensive CANS assessment was not completed as required. Use of state pool funds under these circumstances constitutes non-compliance with CSA statutory requirements governing access to state pool funds. Details provided in the table below.

Client No.	Exception	Period Lapsed	Services Funded	Total Cost Note1
001	Annual: none since 9/2013	07/2016 – 06/2017	Educational	\$89,875
002	Annual: none since 3/2015	07/2016 – 12/2016	Educational	\$19,170
003	Initial: none prior to 11/2017	05/2017 – 06/2017	Community-based Behavioral Health	Note2
Total				\$109,045
<b>State Share</b>				<b>\$59,059</b>

Note1: Figures based on reports of client payment history and invoices.

Note2: Questioned costs for this client are included in observation three (3).

Criteria: COV [§ 2.2-2648](#), Item 16, [§ 2.2-5206](#), Item 12, and [CANS Frequency of Administration - Updated 2013](#)

3. Fauquier County CSA expended \$2,520 for Community-based behavioral health services (Intensive In-Home or IIH) for a non-Medicaid eligible youth wherein local practice did not comply with established CSA policy as follows:
  - A. Documentation of an assessment was not maintained that included the signature and written approval of a licensed mental health professional (with their stated credentials).
  - B. As an alternative, Fauquier County representatives did not opt to purchase an independent clinical assessment.
  - C. The CPMT did not formally request (in writing) an exception to this policy through OCS predicated on exceptional circumstances that would warrant an exception.

Per CSA Policy, state pool funds expended for community-based behavioral health services that do not comply with the established criteria shall be subject to denial of funds. CSA staff indicated that the service authorized for funding was in-home counseling. However, the FAPT approved service plan and the vendor invoice denote Intensive In-Home Therapy that are supported by the number of hours of service delivery per the vendor rate sheet and the number of hours requested by FAPT and authorized by CPMT.

Client	FY	Service	Total Costs - Note1
003	2017	Intensive In-Home Therapy	\$2,520
<b>State Share</b>			<b>\$1,942</b>

Note1: Figures based on reports of client payment history and invoices.

Criteria: COV [§ 2.2-5206](#) Item 6, [Policy Manual for the Children’s Services Act, Section 6.3 Community Based Behavioral Health Services](#)

### RECOMMENDATIONS

**The Fauquier 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 coordination of long-range planning is formally documented, which includes the establishment of locally specific goals, objectives, strategies, performance metrics (benchmarks or milestones), target dates, and responsible parties for monitoring and reporting progress toward achievement of identified goals. The CPMT should document long-range planning activities in the CPMT minutes.
2. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding, to include ensuring that required assessments have been completed and signed (where applicable) by authorized persons and/or required waivers have been granted. The CSA Office should maintain required documentation in the individual client records to evidence compliance requirements have been met.
3. 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.

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 Fauquier County CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the assistance and cooperation that was provided by Erika Visnevskiaia, CSA Coordinator during our on-site visit. Ms. Visnevskiaia'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  
Paul S. McCulla, Fauquier County Administrator  
Azita Fetterer, CPMT Fiscal Agent  
Erika Visnevskiaia, CSA Coordinator  
SEC Finance and Audit Committee