



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

June 12, 2018

Ms. Wanda E. Rogers, CPMT Chair
City of Hampton CSA Program
1320 LaSalle Avenue, Suite 217
Hampton, VA 23669

RE: City of Hampton Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 44-2018

Dear Ms. Rogers,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the City of Hampton 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 26, 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 City of Hampton CSA program, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion reported by the City of Hampton 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 City of Hampton CSA. The explanation for our assessment results are as follows:

The City of Hampton 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 a deficiency 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 Hampton CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATION

Access to state pool funds requires completion of the mandatory uniform assessment instrument. The Child and Adolescent Needs and Strengths (CANS) assessment is the official tool adopted by CSA. A comprehensive CANS assessment is required to be completed initially, annually, and upon discharge of CSA funded services, using the online application referred to as CANVaS. The City of Hampton CSA Program incurred expenditures totaling \$8,740 in FY 2017 for one (1) of ten (10) cases examined in which an initial CANS was not documented in the CANVaS application as required. Services were initiated in April 2017. Use of state pool funds under these circumstances constitutes non-compliance with CSA statutory requirements. The state share of total questioned expenditures was \$5,923.

SERVICE DESCRIPTION	FY	QUESTIONABLE COSTS**
Special Education – Private Day (April 2017 – June 2017)	2017	\$8,740
	State Share	\$5,923
**Figures based on reports of client payment history.		

Criteria: COV [§ 2.2-5212](#), CSA Policy Manual Section 3.6 Mandatory Uniform Assessment Instrument, and [CANS Frequency of Administration - Updated 2013](#)

RECOMMENDATIONS

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

1. Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding. Adequate documentation should be maintained as justification for CPMT funding decisions. The FAPT and CSA Coordinator should ensure that CANS assessments have been completed and verified prior to submitting funding requests to CPMT for authorization.
2. Periodic case reviews should be performed by someone other than the CSA Coordinator 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 adopting guidelines pertaining to [CSA Documentation Inventory](#) and [Utilization Review Guidelines](#), which are published on the CSA website.
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.

CLIENT COMMENTS

See Attachments

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Hampton CPMT has submitted a complete and satisfactory quality improvement plan (QIP) to address the reported observation. The QIP denotes immediate implementation of the tasks identified with ongoing reviews thereafter. 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 Hampton 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 that was provided by Elizabeth Clark, CSA Coordinator during our on-site visit. Ms. Clark'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
Mary Bunting, Hampton City Manager
Karl S. Daughtrey, CPMT Fiscal Agent
Elizabeth Clark, CSA Coordinator

Attachments

ATTACHMENTS



Hampton Family Assessment and Planning Team

Child-centered, family-focused & community-based services for at-risk youth & their families

City of Hampton/Response to Self-Assessment Audit

As a locality we have always expected and performed with a high degree of fidelity to the CSA legislation both in intent and implementation. The period of review for the self-assessment audit came during a period of transition for our locality. Beginning July 1, 2016, we implemented an upgrade to both our case management systems and financial systems, the state moved to the LEDER's system for the collection of required financial and demographic data, and later in that year we moved to CANVAS 2.0. While these upgrades were imperative to maintaining and moving our system forward, there were a number of challenges that were presented during this period of transition. There was difficulty to payment processing and state reporting which we made an intentional effort to keep our state partners aware of and there were challenges in the day to day use /interactions of the upgraded systems. This information is provided to you as a point of context in our self-assessment audit. While we are disappointed in any finding, we respectfully provide the additional feedback for consideration.

Case reviews are completed by a number of individuals in addition to the CSA Coordinator. Current practice includes review by not only CSA staff but members of the FAP team who review the record with every staffing, payment, or activity entered. We currently complete CANS assessments upon referral, during every staffing, and upon discharge for all youth. While we have multiple reviews of a case record, in this instance there was still an error. The CANS assessment noted was a special education student and the expenditure was for a private day school placement. In an effort to minimize the potential for errors, we have implemented a checklist to be completed by CSA staff at the time of referral. We have also modified existing forms that we utilize for our utilization review activities (ongoing and upon discharge) from our local CSA program. These efforts include the verification of the CAN's assessment in CANVAS prior to the authorization of funding. We acknowledge the error that was made but respectfully ask that it be viewed in the context of the total scope of work. As a locality we have reviewed our current system for completing the CANS and have implemented several strategies to increase the internal controls to ensure that CANS is completed and entered into the CANVAS system prior to the approval of funding; upon the referral, ongoing, and at the time of discharge. These activities include the identification of a team member at all stakeholder agencies who will ensure the completion and verification of CAN's upon referral to the FAPT team by their agency. These individuals will also work with our designated report preparer to address any concerns or issues with CAN's requirements. Additionally, we have provided updated training to current CSA staff and team members to insure clarity regarding expectations and requirements when completing utilization review activities. Please note these activities have been occurring but in light of the finding, we have reviewed and updated our process to ensure continued compliance.

As a result of our self-assessment and the discussion during and after the validation process we have attached a corrective action plan for our locality which includes not only required changes but updates that we felt would enhance our local CSA program. Resources are never unlimited and as we have examined our system, we always see opportunities for growth. In an effort to strengthen our CSA program, we recognize the need to continue to promote and strengthen our stakeholder relationships and responsibilities for the successful outcomes for our CSA youth and families. The corrective action plan that we have submitted is reflective of our localities commitment to ensuring full compliance with our statutory requirements as well as ensuring the continuing positive outcomes for the children and families of the City of Hampton.

We would like to thank Ms. Bacote for her guidance and feedback during this process. Her clarity and knowledge regarding CSA has allowed us to increase the transparency and efficiency of our CSA program. Her professionalism and approach to the process has been one of development of the local program while adhering to the fidelity to the CSA model and the statutory requirements. We value the continued partnership with our State office and thank you for your time in reviewing this information for consideration.

Sincerely,

Elizabeth Clark

CSA Administrator, City of Hampton

City of Hampton, CSA Correction Action Plan

ACTION ITEM	CORRECTIVE ACTION	TIMELINE
<p>CAN's/CANVAS- The initial CAN's assessment was completed into CANVAS was entered with the fourth quarter review date, not the date of referral.</p>	<p>In review of current practice, it was determined that in an effort to minimize the potential for this to occur there needs to be a more formalized process in place to verify CANVAS submission prior to funding approval. Our current utilization review checklist has now been revised to three separate checklists (initial checklist, ongoing utilization reviews and discharge checklist). CSA staff will complete an initial check list upon referral which includes required elements (eligibility, releases, CANVAS entry, etc.) prior to staffing. Additionally, the agency representative for each stakeholder agency will review the referral packet prior to submission to ensure all required documentation is completed. All CSA staff and FAPT representative have received additional training and updates to ensure further transparency and accountability.</p>	<p>Implemented Immediately, review of new processes will be evaluated by monthly meetings with CSA staff and FAP team and review of checklists completed to ensure compliance.</p>
<p>By-Laws Updated</p>	<p>As a result of the review, it was established that our current by-laws had not been updated for a significant period of time and did not reflect current code language. The by-laws were updated by our City Attorney and have been provided to CPMT and are scheduled to be voted on during the June 2018 CPMT meeting.</p>	<p>June 2018</p>

Discharge Utilization Review	An observation was made during the validation process about the current manner of documentation of UR activities at discharge. Our current documentation has been revised to clearly denote required UR activities completed upon discharged from CSA system.	June 2018
CPMT Financial Reports and Minutes	During the validation process, recommendations were provided to the current format of reports and documentation to CPMT. After a review of the reports and discussion regarding information provided to CPMT was provided with additional options were discussed during March and April 2018 CPMT meetings. The CPMT minutes have been re-formatted to more effectively show approval of financial reports and additional reports are now provided to show increased breakdown of expenditures by youth and category.	May 2018
CPMT Designee	During the validation process, an observation was made regarding the CSA Coordinator's role as the CPMT designee for funding authorization. The IFSP/ and authorization for funding forms were revised to clearly delineate the CSA coordinator's signature as the CPMT designee as reflected in local policy.	April 2018

Wanda E. Rogers, Director of Social Service

CPMT

Elizabeth Clark

CSA Administrator