



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

July 25, 2018

Ms. Anne Bueche, CPMT Chair
King George County CSA Program
POB 1239
King George, VA 22485

RE: King George County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 41-2018

Dear Ms. Bueche,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the King George 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 May 17, 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 King George County CSA program, our independent validation:

Concurs

Partially Concurs

Does Not Concur

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

The King George 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 a deficiency indicating non-compliance. 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 King George County CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Services provided to children and families funded by CSA pool funds are required to be documented in an individual and family services plan (IFSP). For one (1) of ten (10) client files examined, the IFSPs reviewed from July 2016 to March 2017 did not include residential treatment services among the recommendations. The FAPT did complete and sign the Certificate of Need for Admission to Residential Psychiatric Treatment (CON). However, the CON lacks data elements of the IFSP that identifies: strengths, long/short-term goals and objectives, expected outcomes, target date for achievement, progress updates, and duration of services to be provided. While Medicaid funds reimbursed treatment services, congregate care educational costs were borne by CSA. Educational services were provided by the private-day school operated by the residential treatment provider (i.e. congregate care educational services). The placement in a residential setting was not for educational purposes, but rather intensive treatment services.

The IFSP was not properly documented to evidence appropriateness of service planning decisions relating to non-educational treatment services and to allow for adequate monitoring that ensures services recommended continue to provide the most appropriate and effective services for the child and his/her family, regardless of funding source (CSA or Medicaid). Use of state pool funds under these circumstances constitutes non-compliance with CSA statutory requirements governing FAPT referrals, making it local government's responsibility for funding the purchased services associated with the placement decision. The King George County CSA Program incurred \$18,706 in congregate care educational expenditures, of which \$11,851 was reimbursed as the state share. However prior to the residential placement, the CPMT authorized funding for special education-private day services covering the same period that congregate care educational services were provided. Thus, the fiscal impact of the questioned costs is null.

Criteria: COV § 2.2-5208 Items 4 and 5, § 2.2-5209, § 2.2-2648, Item 20

SERVICE DESCRIPTION	FY 2017	Allowable Costs	Questionable Costs*
Special Education Private Day	07/2016 – 03/2017	\$22,686	\$0
Congregate Care Education	09/2016 – 03/2017	\$0	\$18,706
	State Share	\$14,458	\$11,851
	Net Fiscal Impact**		\$0
*Figures based on reports of client payment history.			
**Allowable cost exceeds questionable costs, thus fiscal impact is zero or null.			

RECOMMENDATIONS

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

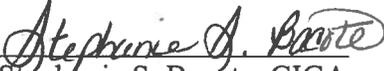
- The CSA Coordinator and the FAPT should ensure that minimum documentation requirements are met and correspondence is maintained in the client case file or readily accessible in order to substantiate services recommended to CPMT for funding authorization.

RECOMMENDATIONS CONTINUED
<ul style="list-style-type: none">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 King George County CPMT has submitted a quality improvement plan to address the observations outlined in this report. 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 King George 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 Serita Parlett, CSA Coordinator during our on-site visit. Ms. Parlett'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
Neiman C. Young, King George County Administrator
Dave Coman, CPMT Fiscal Agent
Director, King George County Department of Social Services
Serita Parlett, CSA Coordinator

Attachments

ATTACHMENT – CLIENT RESPONSE



Ann M. Bueche
 CPMT Chair
 P.O. Box 1239
 King George, VA 22485
 Telephone: (540) 775-5833
 Fax: (540) 775-2165

July 24, 2018

Ms. Stephanie Bacote
 Program Audit Manager
 Office of Children’s Services
 1604 Santa Rosa Road
 Suite 137
 Richmond, Virginia 23229-5008

RE: King George Children’s Services Act (CSA) Program Audit Self- Validation, File No. 41-2018

Dear Ms. Bacote:

After close review of the drafted findings letter dated July 16, 2018, we concur with your finding that King George County Children’s Services Act (CSA) Program is out of compliance. Outlined below are the facts of the client file cited in your letter.

Timeline	Case Manager 1- DSS	Case Manager2- Schools
June 2016- Client in Therapeutic Foster Care (TFC) and IEP-private day school placement at Charterhouse.	Requested Basic Maintenance, Enhanced Maintenance and Private Foster Care Support, Supervision & Administration from Intercept Youth Services to cover 7/01/16 – 9/30/16.	Requested Private Day services from Charterhouse to cover 7/01/16 – 8/30/17.
August 2016- Client removed from TFC placed in UMFS (Medicaid funded). Client remained in private day school.	Brought Certificate of Need to emergency FAPT for approval signatures as required. No funding requests were presented; child was covered by Medicaid. CSA funding for residential not required.	No action needed. IEP services still be delivered in same location and placement (private day school). IEP team not obligated to reconvene as educational placement of student did not change. Previous goals and objectives and June 2016 IFSP remain in place.
December 2016	No action required as CSA funding not utilized and no longer required.	Brought case to FAPT for review. No additional funding requests presented.
January 2017	Unencumbered funds for Intercept Youth Services with Finance Dept.	No Action
March 2017	Requested Basic Maintenance, Enhanced Maintenance and Private Foster Care Support, Supervision & Administration from Intercept Youth Services to cover 3/01/17 – 6/30/17.	Brought case to FAPT for review. No funding requests presented.

ATTACHMENT – CLIENT RESPONSE

The non-compliance observations focus on the lack of the development of an IFSP including residential placement for the student. At the time we did not believe that another IFSP was required to come to FAPT in August for approval as the client's residential assignment was being funded by Medicaid. While there was no lapse in services for the client for the duration of this period, we certainly strive to follow all regulations set forth by the Children's Services Act. We have already taken measures to self-correct and will add those to our annual CSA training, and make it part of our FAPT policy. Thank you for the opportunity to address your letter. As requested, attached you will find a Quality Improvement Plan to address non-compliance. If you have any further questions or concerns please contact me at (540) 775-8621.

Respectfully,



Ann M. Bueche
King George CPMT Chair

Enclosures: Quality Improvement Plan

cc: Dave Coman, CPMT Fiscal Agent
Serita Parlett, CSA Coordinator

ATTACHMENT – CLIENT RESPONSE

QUALITY IMPROVEMENT PLAN KING GEORGE CSA

QUALITY IMPROVEMENT PLAN DETAILS

Condition No. and description	Quality Improvement Task	Responsible Party	Target Date	Self-Reporting Status		
				In Progress	Completed	Date Completed
Services provided to children and families funded by CSA pool funds are required to be documented in an individual and family services plan (IFSP). The IFSP must document appropriateness of service planning decisions relating to non-educational treatment services and to allow for adequate monitoring that ensures services recommended continue to provide the most appropriate and effective services for the child and his/her family, regardless of funding source (CSA or Medicaid).	1- Update annual training to include additional information about IFSPs for non-funded clients and clients with multiple case managers including: -Updating coding (when to change coding to Congregate care -Case Closure -Case Review of clients not funded through CSA	CSA Coordinator	January 2019	X	<input type="checkbox"/>	
	2- Revise FAPT policy to reflect IFSP procedures for non-CSA funded clients	CSA Coordinator	January 2019	X		

Effective 7/24/2018