

***CHILDREN'S SERVICES ACT
PROGRAM AUDIT***

Madison County

***Audit Report No. 03-2020
December 12, 2019***



Office of Children's Services
Empowering communities to serve youth

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EXECUTIVE SUMMARY

The Office of Children's Services has completed an audit of the Madison County Children's Services Act (CSA) program. The Madison County CSA program provided services and/or funding to 88 eligible youth and families in fiscal year (FY) 2019. The audit included review and evaluation of management oversight, operational, and fiscal practices. Based upon established statewide CSA performance measures reported as of FY 2018, significant achievements for the Madison County CSA program were:

- the percentage of youth with a decrease in the Child and Adolescent Needs and Strengths (CANS) child behavior/emotional domain increased 8.3% from FY 2017 and exceeded the statewide average for FY 2018 by 4.7%.
- the percentage of youth with a decrease in the CANS school domain improved by 11% from FY 2017 to FY 2018.
- foster care children in family-based placements increased 8.6% from FY 2017 to FY 2018.

However, there are additional opportunities to effect quality improvement in other areas of the CSA program. The audit concluded that there were major deficiencies¹ in compliance and internal controls particularly in reference to operational, governance, and fiscal practices. Conditions were identified that could adversely affect the effectiveness and efficient use of resources and compliance with statutory requirements. The following significant issues were identified:

- Expenditure reimbursements were requested and processed for payment of services where CSA compliance requirements were not met. Specific non-compliance items identified were: (1) administration of the mandatory CANS Assessment; (2) emergency placements through the Family Assessment and Planning Team (FAPT); (3) paying expenditures eligible for other funding (Title IV-E or Medicaid); and (4) funding services that were not recommended by an approved FAPT and/or multi-disciplinary team (MDT). The total questioned cost equals \$27,069.28 of which \$18,844.96 represents the state share.
- Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Omissions from client case file documentation included: parental co-pay assessments; expired and or incomplete consent to exchange information forms; and service plan data elements such as child and or family strengths, discharge planning, and evidence of family engagement. This observation was identified in the prior audit reports issued January 2018 and March 2017.
- Non-public members serving on CPMT did not complete the Statement of Economic Interest (SOEI) disclosure forms. This observation was identified in the prior audit report issued January 2018 and March 2017.

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

The Office of Children's Services appreciates the cooperation and assistance provided on behalf of the CPMT and other CSA staff. Formal responses from the CPMT to the reported audit observations are included in the body of the full report.



Stephanie S. Bacote, CIGA
Program Audit Manager



Annette E. Larkin, MBA
Program Auditor

INTRODUCTION

The Office of Children's Services has completed a financial/compliance audit of the Madison County Children's Services Act program. The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing (Standards). The standards require planning and performance of the audit pursuant to stated audit objectives in order to provide a reasonable basis for audit observations, recommendations, and conclusions. The audit was completed on December 12, 2019 and covered the period July 1, 2018 through June 30, 2019.

The objectives of the audit were:

- To determine whether adequate internal controls have been established and implemented over CSA expenditures.
- To determine the adequacy of training and technical assistance by assessing local government CSA staff knowledge and proficiency in implementing local CSA programs.
- To assess whether operations have maintained high standards for sound fiscal accountability and ensured responsible use of taxpayer funds by evaluating fiscal activities of the local CSA program.
- To assess the level of coordination among local government CSA stakeholders and efforts to improve CSA performance by evaluating the local CSA program's operational and utilization review practices.
- Assess implementation of quality improvement plans addressing prior audit observations reported by OCS and/or identified in the prior self-assessment evaluation completed by the Madison County. The audit report dates were January 22, 2018 and the self-assessment validation report date was March 27, 2017.

The scope of the audit included youth and their families who received CSA funded services during fiscal year (FY) 2019. Audit procedures included reviews of relevant laws, policies, procedures, and regulations; interviews with various CSA stakeholders; flowcharts of operational and fiscal processes; various tests and examination of records; and other audit procedures deemed necessary to meet the audit objectives.

BACKGROUND

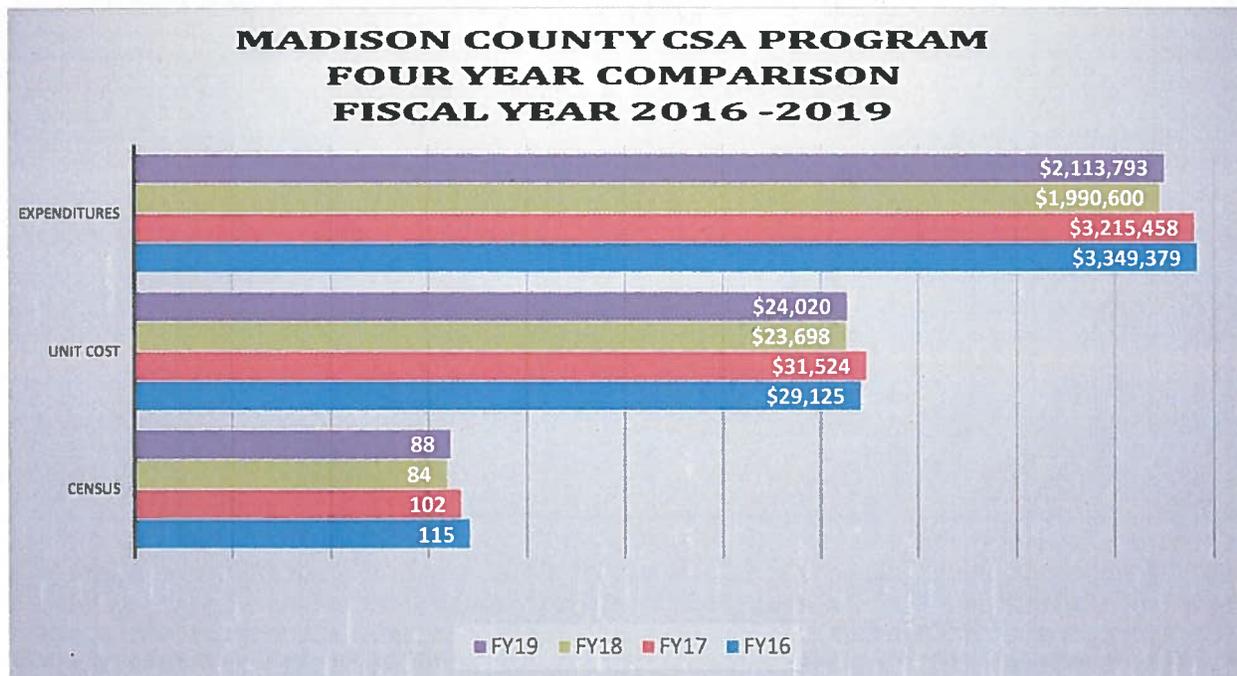
Madison County was established in 1792 and named for the family of prominent statesman James Madison, the United States' fourth President. Madison County is located in the Shenandoah Valley region of Virginia. It borders the counties of Page, Rappahannock, Culpeper, Orange and Greene. According to the U.S. Census Bureau Quick Facts, the estimated population in 2018 was 13,295 and the median household income from 2013-2017 was \$52,287.

The Children's Services Act (CSA) is a law enacted in 1993 that establishes a single state pool of funds to purchase services for eligible youth and their families. The state funds, combined with local community funds, are managed by a local interagency team, referred to as the Community Policy and Management Team (CPMT) that plans and oversees services to youth. The CPMT is supported by a Family Assessment and Planning Team (FAPT) responsible for recommending appropriate services to eligible children and families. Administrative services are managed through the local CSA office staffed by a CSA Coordinator. Expenditure demographics for fiscal 2016 to 2019 are depicted below.

CSA Pool & Census Data by FY for the Madison County (2016-2019)

| FY | Census | Census Change | Census % Change | Pool Expenditures | Expenditures \$ Change | Expenditures % Change | Unit Cost | Unit Cost % Change |
|----|--------|---------------|-----------------|-------------------|------------------------|-----------------------|-----------|--------------------|
| 16 | 115 | 5 | 5 | \$3,349,379 | \$475,961 | 17 | \$29,125 | 11 |
| 17 | 102 | -13 | -11 | \$3,215,458 | -\$133,921 | -4 | \$31,524 | 8 |
| 18 | 84 | -18 | -18 | \$1,990,600 | -\$1,224,858 | -38 | \$23,698 | -25 |
| 19 | 88 | 4 | 5 | \$2,113,793 | \$123,193 | 6 | \$24,020 | 1 |

Note: Changes recorded for FY 16 are based on difference from fiscal year 2015 to 2016



**SECTION 1 MAJOR DEFICIENCIES
OBSERVATIONS AND RECOMMENDATIONS**

A) FISCAL ACTIVITIES

Observation #1:

Criteria:

Compliance and Internal Control

Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State and local CSA policies and procedures were not met as follows:

1. An initial CANS had not been completed for one (1) client, resulting in \$13,599.45 (state share) in questioned costs. Per CSA Policy Manual Section 3.6.5 Frequency of CANS Administration Items B and C, the initial CANS is required to determine and/or support the child's eligibility for CSA and must be completed prior to the initiation of CSA funded services described on a service plan.
2. CSA pool funds were used in lieu of Title IV-E funds for foster care maintenance expenses for Title IV-E eligible youth. The foster care maintenance costs paid by CSA on behalf of three (3) clients were not refunded to the state pool fund. The state share of questioned cost equals \$1,663.65.
3. The COV §2.2-5209 requires emergency placements to be assessed by FAPT or MDT within 14 days of the placement. In one (1) instance, the FAPT assessment did not occur until 18 days after placement. The prorated state share cost for February 2019–March 2019 was \$1,780.84.
4. CSA pool funds were improperly expended for Medicaid eligible services (treatment foster care – case management and mental health skill building) for Medicaid eligible clients. The total questioned cost equals \$858.12 (state share). The services were denied authorization for Medicaid funding or ineligible for CSA funding based on the following:
 - A) Required documentation was not submitted timely (treatment foster care – case management), and
 - B) The service provider did not request funding authorization from Medicaid because the provider determined that the client did not meet medical necessity criteria for the purchased service (mental health skill building). Thus, a formal denial of funding authorization was not obtained from Medicaid. Consequently, CSA Policy 6.3 Community-based Behavioral Health Services (Adopted July 2013) states “For purposes of determining the use of Pool Funds for the purchase of community-based behavioral health services, the OCS shall apply the regulations established by the Department of Medical Assistance Services (“DMAS”) regarding the appropriateness of such services.... The CPMT may request an

exception to this policy through the OCS when the CPMT believes there are exceptional circumstances that warrant exception to this policy and/or a Medicaid enrolled provider of a needed service is not available³ for Medicaid-eligible children and youth. Such requests shall be made in writing and shall state the reason(s) and describe the circumstances supporting the CPMT's claim." However, no such exception request was submitted to OCS.

- Services were funded for one (1) eligible client that had not been assessed and recommended by a properly staffed FAPT or MDT. The IFSP, with completed signatures, documented that the meeting attendees included both parents and one FAPT representative that also serves as the agency case manager. Per Madison County CSA Local Policy and Procedures, a "quorum for all FAPT meetings is 50% of its core members or designees, including an officer. A simple majority of the quorum will determine decisions." The total questioned cost equals \$943 (state share).

Refer to the table below for the breakdown of questioned cost.

| Client | Error Type | Period | Total Expenditures | State Share |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|--------------------|--------------------|
| A | 5 | Apr. 19 - May 19 | \$1,133.00 | \$943.00 |
| B | 3 | Feb. 19 - Mar. 19 | \$2,608.00 | 1,780.84 |
| | 4 | Mar. 19 - May 19 | \$979.50 | \$650.88 |
| C | 1 | Sept 18 - May 19 | \$19,763.95 | \$13,599.45 |
| D | 4 | May 19 | \$249.00 | \$207.24 |
| E | 2 | Oct. 18 | 1,672.00 | \$1,111.04 |
| F* | 2 | Mar. 19 | 210.81 | \$175.46 |
| G* | 2 | Mar. 19 | 453.02 | \$377.05 |
| Total | | | \$27,069.28 | \$18,844.96 |
| Error Description 1 - No initial CANS; 2 - Refund due from Title IV-E.; 3- 14 -day emergency placement requirement 4 - service funded for ineligible FAPT/MDT; 5 - No Authorization for a Medicaid eligible service. | | | | |
| *Exceptions Identified from Title IV-E Compliance Report | | | | |

CSA Policy 4.6 Denial of Funds (Adopted June 2011), states that CSA pool funds can be withheld if a locality fails to comply with, or is in violation of statutory requirements and policies, whether they are specific to the CSA or promulgated by participating agencies.

Recommendations:

- Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding and/or other appropriate funding sources. Adequate documentation, should be maintained as justification for CPMT funding decisions.
- Upon notification that a client has been determined Title IV-E eligible, the CSA office should immediately initiate actions to recover the state share of CSA pool funds expended by ensuring the locality completes and documents refunds for all applicable foster care maintenance cost.
- 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 Comment:

“Concur”

B) PROGRAM ACTIVITIES

Observation #2:
Criteria: Compliance and Internal Control –Repeat Observation

Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Ten (12%) out of 88 client case files were examined to confirm that required documentation was maintained in support of and to validate FAPT and/or MDT referral and CPMT funding decisions. CSA Policy Manual Section 3.5 Records Management (Adopted August 1998) states “Each CPMT shall ensure collection of child-specific documentation to demonstrate compliance with the CSA.” Documentation missing from case files reviewed are listed in the table below.

| Description | # of Cases | Error Rate |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------|
| A. Missing parental co-pay assessments (2 eligible cases); COV§ 2.2-5208 and CSA Policy 3.5 | 2/2 | 100% |
| B. Missing data elements on IFSP (child and family strengths, discharge planning, and parent (biological or foster) participation in FAPT meetings; CSA Policy 3.5 (Repeat) | 7/10 | 70% |
| C. Missing/incomplete/or expired consent to exchange information forms; COV§ 2.2-5210 and CSA Policy 3.5 (Repeat) | 3/10 | 30% |

The non-compliance observations pertaining IFSP data elements and consent to exchange information were also identified in the CSA audits completed January 2018 and the March 2017. After each audit, a quality improvement plan was developed notating an action step to ensure adequate documentation would be maintained as justification for CPMT funding decisions. However, the controls implemented are not working as intended.

Insufficient data collection and poor document management in service planning may lead to increased operational and fiscal inefficiency and ineffectiveness of the local program. Further, this condition fosters an environment that makes the program susceptible to potential loss of access to State funding as a result of non-compliance with CSA statutes and/or policies.

Recommendations:

1. The FAPT and/or the CSA Coordinator should ensure that minimum documentation requirements are met and maintained in client case files, and all IFSP data elements are documented.
2. The CPMT should establish a quality assurance review of client case files at least annually to ensure compliance with CSA policies and statutory requirements. Someone other than the CSA Coordinator should perform this review as an independent and objective assessment.

Client Comment:

“Concur”

C) CPMT GOVERNANCE

Observation #3:

Criteria:

Compliance and Internal Control - Repeat Observation

The parent representative serving on the CPMT did not complete the statement of economic interest (SOEI) form as required by COV §2.2-5205. The CPMT misinterpreted the statutory requirement, believing that parent representatives were only to complete the SOEI disclosure form if he/she received a stipend. The parent representative on the Madison County CPMT receives no compensation. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds are reduced based on the increased opportunity that an individual may not properly disclose personal financial interest.

This non-compliance observation was also identified in the CSA audits completed January 2018 and March 2017. After each audit, a quality improvement plan was developed notating an action step to ensure required documentation would be maintained. However, the controls implemented are not working as intended.

Recommendations:

The CPMT should ensure all parties not representing a public agency complete the SOEI forms immediately upon appointment and maintain filing in accordance with the Administrative Memo 18-02 dated January 16, 2018.

Client Comment:

“Concur”

Observation #4:

Criteria:

Compliance and Internal Control

The CPMT has not documented a formal plan to substantiate coordination of long-range planning that includes an assessment of the current risks, strengths and needs of the existing system, as well as establishing and documenting measurable criteria for evaluating the effectiveness of the local CSA program. The ability and likelihood of the CPMT to adequately monitor and provide oversight of the local CSA program is an essential component of organizational governance. The absence of a formal planning, coordination, and program evaluation to ensure that the goals and objectives of the program are met ultimately impacts the CPMT efforts to better serve the needs of youth and families in the community and to maximize the use of state and community resources.

Recommendations:

As required by COV§2.2-5206, the CPMT should coordinate long-range planning. The results of those efforts should be documented in a formal plan.

Client Comment:

“Concur”

**SECTION 2- OTHER DEFICIENCIES
OBSERVATIONS AND RECOMMENDATIONS**

D) CPMT GOVERNANCE

Observation #5:

Criteria:

Internal Control

Supervised visitation is primarily the responsibility of the local department of social services (LDSS). However, CSA pool funds were expended for supervised visitation in 6 of the 8 (75%) eligible foster care cases examined. Upon further review of FY 2019 CSA expenditure data, Madison County CSA spent approximately \$67,267 on supervised visitation for 19 clients that accounted for 3% of the county’s total CSA expenditures for the fiscal year and 35% of their current foster care caseload. Total actual funding could not be easily determined because expenditure data is not collected by the specific service name. Madison County’s Department of Social Services (MCDSS) representatives provided the following explanation for utilization of CSA funds for supervised visitation:

- MCDSS is small agency with limited staff to perform mandated and non-mandated services. Currently, Madison has 55 youth or young adults in foster care and only 4 foster care workers to case manage all aspects of the foster care episode.

- High level of turnover in MCDSS. Retention of workers is a challenge due to the stressors of the job and extremely low salaries.
- As a safety service, use of supervised visitation is assessed on a case by case basis. If there are safety concerns regarding substance abuse, physical neglect, physical abuse and cognitive challenges, it is pertinent to have someone monitor the visit, help reinforce positive parenting techniques, and provide a neutral party to assess and document the parent-child interaction. "Most parents are more receptive and provide a natural interaction pattern when their DSS foster care worker is not in that capacity."
- Visits between parent and child will be greatly impacted in Madison County without supervised visitation services, as it would be impossible to provide 1-3 visitation opportunities for the children and their families.

Fifty-five (55) foster care cases distributed among four (4) service workers is within the acceptable caseload criteria adopted by the VDSS as established in Section 17.6 of the VDSS Foster Care Manual. VDSS Foster Care Manual Section 4.8.2 details the levels of supervision during a visit (supervised, monitored and unsupervised) and provides guidance pertaining to responsibility of the service worker. Lastly, not all visitations are required to be supervised.

Staffing challenges do not relieve the LDSS of their administrative responsibility to supervise visitation (where appropriate) of families to children in foster care. Thus, the FAPT should assess whether the level of service is required based on the needs of the child and family and not based on the staffing levels of the LDSS. Consequently, the CPMT has a responsibility to evaluate the effectiveness and efficient use of state pool funds where such circumstances are present.

Recommendations:

1. The FAPT should ensure that the rationale for all recommended services is clearly documented in the service plan, especially where the service recommended is the within the scope responsibility of another agency and that is funded separately from the state pool (COV §2.2-5211).
2. Periodically, the CPMT should identify services funded that may be within the scope of responsibility of another agency. Once identified, the CPMT should review and analyze aggregated expenditures to assess potential supplanting of funds and that costs are effectively managed.

Client Comment:

See Attachment 1

Auditor Response:

See Attachment 2

CONCLUSION

This audit concluded that there were major deficiencies in compliance and internal controls over the Madison County CSA program, particularly in reference to operational, governance, and fiscal practices. Conditions were identified that could adversely affect the effective and efficient use of resources, as well as compliance with statutory requirements. An exit conference was conducted on November 12, 2019, to present the audit results to the Madison County CPMT. Persons in attendance representing the Madison County CPMT were as follows:

Charlotte Hoffman, Madison Board of Supervisors
Martha Carroll, CPMT Chair
16th District J&DR Court Services
Mary Jane Costello, CPMT Fiscal Agent
Madison County Director of Finance/Assistant County Administrator
Wade Kartchner, Virginia Department of Health
Jeanette Alexander, Madison County Public Schools
Taisha Chavez, Rappahannock Rapidan Community Services
Vassi Griffis, Private Provider
Valerie Ward, Madison DSS
Brenda Allen, Parent Representative
Tiffany Woodward, CSA Coordinator

Representing the Office of Children's Services was Annette Larkin, Program Auditor. We would like to thank the Madison County CPMT and related CSA staff for their cooperation and assistance on this audit.

REPORT DISTRIBUTION

Scott Reiner, Executive Director

Office of Children's Services

Jack Hobbs, Madison County Administrator

Martha Carroll, CPMT Chair

Mary Jane Costello, CPMT Fiscal Agent,

Madison County Director of Finance/Assistant County Administrator

Tiffany Woodward, CSA Coordinator

Attachment 1

December 9, 2019

Madison DSS Response to CSA Program Audit Findings

November 2019

Excerpt from Madison County CSA Program Audit Report 11/19.....

D) CPMT GOVERNANCE

Observation #5:

Criteria: Internal Control

Supervised visitation is primarily the responsibility of the local department of social services (LDSS). However, CSA pool funds were expended for supervised visitation in 6 of the 8 (75%) eligible foster care cases examined. Upon further review of FY 2019 CSA expenditure data, Madison County CSA spent approximately \$67,267 on supervised visitation for 19 clients that accounted for 3% of the county's total CSA expenditures for the fiscal year and 35% of their current foster care caseload. Total actual funding could not be easily determined because expenditure data is not collected by the specific service name. Madison County's Department of Social Services (MCDSS) representatives provided the following explanation for utilization of CSA funds for supervised visitation:

- MCDSS is small agency with limited staff to perform mandated and non-mandated services. Currently, Madison has 55 youth or young adults in foster care and only 4 foster care workers to case manage all aspects of the foster care episode.
- High level of turnover in MCDSS. Retention of workers is a challenge due to the stressors of the job and extremely low salaries.
- As a safety service, use of supervised visitation is assessed on a case by case basis. If there are safety concerns regarding substance abuse, physical neglect, physical abuse and cognitive challenges, it is pertinent to have someone monitor the visit, help reinforce positive parenting techniques, and provide a neutral party to assess and document the parent-child interaction. "Most parents are more receptive and provide a natural interaction pattern when their DSS foster care worker is not in that capacity."
- Visits between parent and child will be greatly impacted in Madison County without supervised visitation services, as it would be impossible to provide 1-3 visitation opportunities for the children and their families.

Fifty-five (55) foster care cases distributed among four (4) service workers is within the acceptable caseload criteria adopted by the VDSS as established in Section 17.6 of the VDSS Foster Care Manual. VDSS Foster Care Manual Section 4.8.2 details the levels of supervision during a visit (supervised, monitored and unsupervised) and provides guidance pertaining to responsibility of the service worker.

Lastly, not all visitations are required to be supervised. Staffing challenges do not relieve the LDSS of their administrative responsibility to supervise visitation (where appropriate) of families to children in foster care. Thus, the FAPT should assess whether the level of service is required based on the needs of the child and family and not based on the staffing levels of the LDSS. Consequently, the CPMT has a responsibility to evaluate the effectiveness and efficient use of state pool funds where such circumstances are present.

Recommendations:

1. The FAPT should ensure that the rationale for all recommended services is clearly documented in the service plan, especially where the service recommended is the within the scope responsibility of another agency and that is funded separately from the state pool (COV §2.2-5211).
2. Periodically, the CPMT should identify services funded that may be within the scope of responsibility of another agency. Once identified, the CPMT should review and analyze aggregated expenditures to assess potential supplanting of funds and that costs are effectively managed.

RESPONSE:

An August 2019 VDSS agency case review identified the frequency of visits that Madison DSS provides as a significant area of strength....

"The agency provides parents and children with frequent visitations in as natural setting as possible. Such frequent and quality visitations are essential to ensuring that children and families are unified timely and these efforts should be commended. These frequency visitations are provided through private providers in the community and the service is funded through CSA funds. However, per conversation with the agency director following the agency case review, this practice was an audit finding during the agency's recent CSA audit. As the agency is a PIP agency, the agency was encouraged to bring up this issue during the CSA day scheduled for the December CFSR PIP meeting."

Looked at in isolation, OCS is concerned with the percentage of pool funds being spent on funding for contracted supervised visitation. Madison CPMT would like to point out the overall decrease in pool expenditures from 2016 to 2019—overall expenditures have decreased by \$1,235,586. As a locality FAPT and CPMT have assessed this service as necessary to ensure the safety of children in foster care due to the safety and risk factors related to the extreme lack of resources addressing safe housing and substance abuse treatment that would allow for a faster progression from supervised to monitored to unsupervised visitation. Madison DSS states that the investment in this safety service has allowed for shorter stays in foster care and a safe option to offer families to continue and strengthen family relationships while other treatment is taking place. Children and youth are experiencing shorter foster care episodes when this level of visitation is being provided; thus providing greater impact in overall child welfare services.

In Section E: of the Foster Care annual, Foster Care Opening and Maintaining the Case, FSS are directed to address their visitation and communication plans in their foster care service plan, at Family Partnership Meeting, and in a formal visitation plan. (Perhaps, CSA IFSPs should be specifically mentioned in this guidance.) Within the scope of DSS' work with children in their custody, consideration is made for visitation for be in "a setting that is age appropriate and ensures the safety of the child." "Service workers should be creative in implementing visitation to ensure frequent and positive visitation. Limiting visits to what is convenient for the agency limits the agency's knowledge of the parents' ability to learn and demonstrate how to care for their children." Consideration of progress in treatment and services has made it difficult to lessen the amount of supervision required to ensure the safety of children. Contracting with a private provider through CSA processes for this service has allowed for compliance with foster care guidance.

In alignment with DSS guidance from the Texas Best Practices for Visitation guide.....

"Very young children need physical contact to maintain attachment with parent(s) or other primary caretakers. Caseworkers need to identify a child's attachment figures and arrange for infants and toddlers to have frequent and consistent physical contact to ensure the child's physical, social, emotional and cognitive development. Infants and toddlers need to know that their parent(s) care(s) for them. Children placed in care between the ages of 6 months to 3 years are particularly vulnerable to separation from their attachment figure(s) and need more visitation opportunities for this reason. Research indicates that infants and toddlers benefit from daily visitation, at the very least every two to three days.

YOUNG SCHOOL-AGED CHILDREN

School-age children need the availability of attachment figure(s) and are able to use language to help them cope with separation. Secure attachment relies on a child's trust that their parent(s) are available, responsive and protective caregivers. School-age children can use the phone, e-mail, and utilize other forms of contact (i.e. Skype, Facebook and Facetime) to communicate with their parent(s). This group would benefit from face to-face contact on a weekly basis with their parent(s) and siblings provided appropriate supports are in place to facilitate the frequency of face-to-face visitation. As appropriate, school age children should be involved in the development of the visitation plan. Best practice indicates that this group benefits from face-to-face contact occurring 2-3 times weekly."

Madison FAPT and CPMT have approved the use of contracted visitation supervision to ensure that the safety, permanency, and well-being needs of children in foster care are met. Supporting formal documentation on IFSPs perhaps has been lacking, but discussions have been taking place within DSS, at FAPT, and at CPMT about the use of supervised visitation. Moving forward implementation of formal visitation plans, inclusion of those plans in CSA IFSPs can happen. Madison DSS would respectfully ask that the locality's assessment of the appropriateness of this safety service be respected by OCS and the state share disallowance be reconsidered.

Active consultation with VDSS has taken place and moving forward training for foster care workers will take place re the implementation and regular review of a formal written visitation plan for every child in foster care. FAPT reviews and IFSP documentation will include details of factors being considered in making visitation supervision progression decisions. Follow up can take place at the CFRP PIP/CSA meeting on December 13, 2019.

In closing, there is no alternative DSS funding source for funding for this service. Any possible DSS funds for such a thing were included in pools of money that were combined to make CSA Pool funds. Suggestions for the use of Promoting Safe and Stable Families funds are not possible under the existing annual PSSF plan; in that, a community stakeholder's group jointly determines how Madison County can best use PSSF funds and those funds are allocated in the support of other local programs and initiatives. Madison County has determined that the use of the CSA process is the only way this need can be met. Moving forward, this need can be better documented in IFSPs.

Attachment 2

Auditor Response:

We have received your response to the internal control audit observation regarding supervised visitation. There were no questioned cost associate with the observation. We advised the CPMT Chair to consult OCS program consultants for further clarification and discussion.