

CHILDREN'S SERVICES ACT
PROGRAM AUDIT

FINAL REPORT

Rappahannock County

Audit Report No. 17-2020

May 13, 2021



Office of Children's Services
Empowering communities to serve youth

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Final Report Disclaimer

Due to the COVID-19 pandemic, onsite visits to validate management's conclusions have been suspended until further notice. In lieu of onsite visits, audit procedures were conducted remotely. Audit procedures were divided into two phases (Governance and Client Record Reviews). An interim report addressing governance activities was issued on October 21, 2020. The interim report did not include the results of an evaluation of compliance and internal controls pertaining to child/family referrals for service planning and funding as determined through client record reviews. Client record reviews were completed on February 19, 2021. This final report represents the full and completed evaluation of both phases of the audit engagement.

EXECUTIVE SUMMARY

The Office of Children's Services (OCS) has conducted an audit of the Rappahannock County Children's Services Act (CSA) program. The Rappahannock County CSA program provided services and/or funding to 41 eligible youth and families in fiscal year (FY) 2019 and FY 2020. The audit included review and evaluation of management oversight, operational, and fiscal practices. Based upon established statewide Children's Services Act (CSA) performance measures reported as of FY 19, significant achievement for Rappahannock CSA Program were:

- Sixty-one percent (61%) of youth served received community-based services out of all the youth served in Rappahannock County.
- Seventy-seven percent (77%) of children that exited foster care were placed in a permanent living arrangement, which is equivalent to the statewide average.
- Fifty percent (50%) of youth had a decrease in the Child and Adolescent Needs and Strengths (CANS) Assessment school domain. Decreases in CANS score are indicative of improved functioning.

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 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 were not met. Specific non-compliance items identified were in the area of: (1) administration of annual CANS assessments, (2) services not documented on the Individual and Family Services Plan (IFSP), (3) eligibility requirements for youth requiring placement in a private day schools or residential placement for special education services and (4) criteria to access funding for community based behavioral health services. The total questioned cost equaled \$69,137.95 of which \$41,332.45 represents the state share.
- Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Five (5) case files were examined to confirm that required documentation was maintained in support of and to validate FAPT and/or multi-disciplinary team (MDT) referral and CPMT funding decisions. Omissions from client case file documentation included IFSP data elements (child/family strengths, and needs), utilization review (UR), consent to exchange information, and parental co- pay assessments.

OCS appreciates the cooperation and assistance provided on behalf of the Rappahannock County CPMT and other CSA staff. We also would like to acknowledge the excellent assistance and cooperation that was provided by Ms. Kathy White Interim CSA Coordinator. Ms. White's efforts

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.

enabled the audit staff to quickly resolve any questions/concerns observed throughout the audit process. Formal responses from the Rappahannock County 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 conducted a financial/compliance audit of the Rappahannock 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 May 12, 2021 and covered the period April 1, 2019 through March 31, 2020. 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 on and/or identified in the prior self-assessment evaluation completed by the Rappahannock County. The audit report dates were April 4, 2017 and August 27, 2018.

The scope of the audit included a review of CPMT policy/procedure, CPMT meeting minutes, continuous quality improvement, and monitoring of fiscal management and program outcomes, strategic planning, and adherence to established federal, state, and local compliance criteria pertaining to CSA (where validations could be completed remotely).

BACKGROUND

Rappahannock County was established in 1833 and is located in the northern section of the Commonwealth. Rappahannock County is approximately 65 miles southwest of Washington, DC and borders the Virginia counties of Warren (northwest), Fauquier (northeast), Culpeper (southeast), Madison (southwest) and Page (west). According to the United States Census Bureau Quick Facts, the estimated population in 2019 was 7,370 and the median household income from 2014-2018 was \$68,438.

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, and a CSA Coordinator. Expenditure demographics for fiscal years 2017 to 2019 are depicted below.

Source: CSA Continuous Quality Improvement (CQI) Dashboard

At-A-Glance

<u>FY 2017</u>	<u>FY 2018</u>	<u>FY 2019</u>	<u>FY 2020</u>
39	34	41	41
Distinct Child Count	Distinct Child Count	Distinct Child Count	Distinct Child Count
1.0M	1.1M	1.3M	1.5M
Gross Expenditures	Gross Expenditures	Gross Expenditures	Gross Expenditures
1.0M	1.1M	1.3M	1.4M
Net Expenditures	Net Expenditures	Net Expenditures	Net Expenditures
\$25,894	\$31,914	\$31,849	\$35,038
Average Expenditure	Average Expenditure	Average Expenditure	Average Expenditure
0.4199	0.4199	0.4199	0.4199
Base Match Rates	Base Match Rates	Base Match Rates	Base Match Rate
0.3843	0.3804	0.4108	0.4126
Effective Match Rate	Effective Match Rate	Effective Match Rate	Effective Match Rate

OBSERVATIONS AND RECOMMENDATIONS

A) FISCAL ACTIVITIES

Observation #1:

Criteria:

Compliance and Internal Control – Repeat Observation

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. Per Code of Virginia § 2.2-5212, access to the state pool of funds includes determination through the use of a uniform assessment instrument and process. The Child and Adolescent Needs and Strengths (CANS) Assessment is the approved uniform assessment instrument per CSA policy adopted in 2009. The CANS assessment is required initially, annually, and upon discharge from the CSA process. An annual CANS had not been completed for three (3) client case files examined, resulting in \$55,376 in questioned costs of which \$32,194 represents the state share. This non-compliance observation was identified in the OCS audit report dated April 4, 2017. Rappahannock CSA Office subsequently reported to OCS that the quality improvement plan submitted in response to the observations reported had been implemented. The CPMT, as the governing body, is responsible for on-going monitoring of the quality improvement plan to ensure timely implementation of the plan and the actions taken are continuously working as intended. Refer to the summary Table A for a detail breakdown of the questioned cost applicable to Clients A through C.
2. Rappahannock County CSA program funded family support services (counseling services) between April 2019 through July 2019 for one (1) client that was not documented on an individual family service plan (IFSP) resulting in questioned cost \$6,764.78 of which \$4,976.93 represents the state share. This non-compliance observation was identified in the OCS audit report dated August 27, 2018. Rappahannock CSA Office subsequently reported to OCS that the quality improvement plan submitted in response to the observations reported had been implemented. The CPMT, as the governing body, is responsible for on-going monitoring of the quality improvement plan to ensure timely implementation of the plan and the actions taken are continuously working as intended. Refer to the summary Table A for a detailed breakdown of the questioned cost applicable to Clients A.
3. SEC policy 6.3 Community-based Behavioral Health Services (CBBHS) requires the FAPT to maintain documentation that a child meets the criteria established by the Department of Medical Assistance Services (DMAS) eligibility for specific CBBHS to access state pool funds. An assessment by a licensed mental health professional was not provided as verification for one client where CSA funded Intensive In-home (IHH) services, resulting in questioned cost \$6,753.50 of which \$3,917.71 represents the state share. Refer to the summary Table A for a detailed breakdown of the questioned cost applicable to Client A.

4. Per Code Virginia (COV) [§ 2.2-5212](#), eligibility to access state pool funds requires placement for purposes of special education in approved private school educational programs which is evidenced by the student's approved individualized education program (IEP). One (1) student did not have an approved IEP when services were rendered. Questioned costs totals \$3,635.28 of which \$2,108.83 represents the state share. Refer to the summary Table A for a detailed breakdown of the questioned cost applicable to Client B.
5. Expenditures incurred for CSA funded services were not always recorded in the correct expenditure category for financial reporting. One transaction for client D was recorded as a community-based service (CBS) expense instead of private day educational cost resulting in an overpayment of \$243.60 (state share) which is depicted in Table B.

Table A

Client	Error Type	Period of Services	Total Expenditures	State Share
A	1	Nov. 2019 – Apr. 2020	\$8,869.30	\$5,145.08
	2	Jul. 2019	\$6,764.78	\$4,976.93
	3	Jul. 2019 – Oct. 2019	\$6,753.50	\$3,917.71
B	1	Apr. 2019 – Dec. 2019	\$26,229.89	\$15,215.96
	4	Oct. 2019 – Nov 2019	\$3,635.28*	\$2,108.83*
C	1	Apr 1, 2019 – Jul. 31, 2019	\$20,276.88	\$11,833.18
			\$68,894.35	\$41,088.85
Error Description 1- No CANS; 2-Services not on IFSP; 3-missing assessment 4- No IEP				
*Included in total expenditures for Error Type 1. Highlighted separately in this table to show the fiscal impact of the Error 2 only. This figure is not included in the total expenditures for all error types as it has already been included in total for Error Type 1.				

Table B

Client	Incorrect Expense Category	Match Rate	Correct Expense Category	Match Rate	Variance		
					Total Expense	Differential	Overpayment
D	2F (CBS)	0.02099	2G Special Education (SPED)	0.04199	\$1,160	0.2100	\$243.60

Recommendation

- Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding. Adequate documentation, such as but not limited to, administration of annual CANS assessment, documentation on service plan and eligibility determination and current IEPs should be maintained as justification for CPMT funding decisions.
- The CPMT and/or the fiscal agent should implement a quality assurance review of all transactions to ensure transactions are recorded properly in the Local Expenditure Data and Reimbursement System (LEDRS) prior to the submission of the monthly pool fund reimbursement report.

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 based on SEC approved policy 4.7 Response to Audit Findings of whether the identified actions are acceptable or any additional actions that may be required.

Client Comment

See Attachment A for Management Responses

Observation #2:

Criteria

Compliance and Internal Control

Adequate measures were not always consistently applied to ensure effective and efficient use of financial resources that could be used to offset the costs incurred for CSA pool funded services. Assessments of parental co-payments were not documented to evidence parental ability to share financial responsibility for costs associated with services provided to three (3) eligible youth, including non-educational services provided to youth meeting the special education mandate criteria. In a review of the LEDRS refund report it was determined that zero (\$0) co-payment collections were reported from 2012 through 2020. Under these conditions, the opportunity lost for collection of additional funds is significant and could materially impact the local program's ability to increase funding availability for services required to meet the needs of the community.

Recommendation

The CPMT should ensure that the FAPT and the CSA Coordinator documents parental ability to pay, supported by verification of stated income in accordance with the COV §2.2-5208 item 6. The amount assessed should be reported to the CPMT along with the request for approval for funding of FAPT referred services. Such documentation should be retained in the case file for the required records retention period.

Client Comment

See Attachment A for Management Responses

B) PROGRAM ACTIVITIES

Observation #3:

Criteria

Compliance and Internal Control

COV §2.2-5210 requires that consent-to-exchange information be obtained from the parent and/or legal guardian to share client information collected by partnering agencies and other providers with the local CSA representatives. The consent to exchange information form was missing in one (1) of five (5) 20% files tested, which was applicable to client special education services. Failure to document that consent was properly obtained increases the likelihood of non-compliance with CSA and other agency statutory requirements and potential liability due to the unauthorized exposure of protected information. OCS Administrative Memo #18-01, issued January 11, 2018, informs local CSA program that: “Without such information, CPMTs cannot verify that the students are statutorily eligible for CSA funded services and would therefore be unable to authorize the use of CSA funds to cover the costs of private educational placements required by the student’s IEP.” Where the local CSA office is unable to confirm eligibility to access state pool funds due to the absence of consent, the local school division would have been responsible for \$34,826.25 in expenditures incurred that were funded by CSA during the audit period. Without parental consent, local school divisions cannot share student’s educational records (including IEPs) with the CPMT. This includes the student’s “directory information” as well as the educational record. Such disclosure without parental consent constitute a violation of Family Educational Rights and Privacy Act (FRRPA). It should be noted that the client began receiving CSA funded services prior to the issuance of Administrative Memo #18-01.

Recommendation

The Rappahannock County CSA Office and FAPT should ensure that consent to exchange information forms have been completed at the time of referral or immediately prior to the start of the FAPT meeting for all CSA funded cases, including IEP referrals, to be in compliance with OCS directives and the Family Educational Rights and Privacy Act.

Client Comment

See Attachment A for Management Responses

Observation #4:

Criteria

Compliance and Internal Control

Documentation of utilization review (UR) in service planning activities requires strengthening to ensure compliance with program requirements and best practices. Utilization reviews of services documented in the approved service plans and funded by the state pool were not performed in 3 of the 5 client records examined. COV §2.2-5208 item 5 (iv) task the FAPT to “provide regular monitoring and utilization review of the services and residential placement for the child to determine whether the services and placement continue to provide the most appropriate and effective services for the child and his family”.

Recommendation

In accordance with COV §2.2-5208 item 5 (iv) and local policy, the CPMT should ensure that the FAPT performs UR of all services recommended and funded by the state pool. Periodic review of individual client records should be conducted by person(s) independent of FAPT to verify compliance.

Client Comment

See Attachment A for Management Responses

CONCLUSION

This audit concluded that there were major deficiencies in compliance and internal controls over the Rappahannock CSA, particularly in reference to governance and fiscal practices. Conditions were identified that could affect the effective and efficient use of resources, as well as compliance with statutory requirements. An exit conferences were conducted on October 14, 2020 and April 14, 2021, to present the audit results to the Rappahannock County CPMT. Persons in attendance representing the CPMT were:

Both Exit Conferences

Christopher Parrish, Rappahannock Board of Supervisors

Garrey Curry, County Administrator (Former Acting CPMT Chair/Fiscal Agent)

Shannon Grimsley, Rappahannock County Public Schools

Gail Giese, Private Provider Representative

October 14, 2020 (only)

Jennifer Parker, Department of Social Services (Former CPMT Chair)

Mary Pitts, Court Services Unit

Mark Raiford, Parent Representative

Jennifer Driggers, Former CSA Coordinator

April 14, 2021 (only)

Gail Crook, Department of Social Services, CPMT Chair/Fiscal Agent (As of April 2021)

Cathy White, Department of Social Services (Former Acting CSA Coordinator)

Ira Holland, Court Services Unit

Tiffany Matthews, Parent Representative

Tracey Pauley, CSA Coordinator (as of April 2021)

Representing the Office of Children's Services was Annette Larkin, Program Auditor. We would like to thank the Rappahannock 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
Garrey Curry, Rappahannock County Administrator
Gail Crook, CPMT Chair/Fiscal Agent
Director, Rappahannock Department Social Services
Tracey Pauley, CSA Coordinator



RAPPAHANNOCK COUNTY
DEPARTMENT OF SOCIAL SERVICES

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May 12, 2021

Ms. Annette E. Larkin, MBA.
Program Auditor
Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, Virginia 23229

Dear Ms. Larkin,

Thank you for your presentation of the results of the financial/compliance audit conducted by the Office of Children's Services on the Rappahannock County Children's Services Act (CSA) program for the period of April 1, 2019 through March 31, 2020. We appreciated the diligence demonstrated in the communication of the findings to ensure the members of the Rappahannock CPMT understood the findings and had opportunity to ask questions to seek further clarification.

The paragraphs that follow are Rappahannock CSA program management's response to the findings contained in the audit. We look forward to working within our organization and with our stakeholders to ensure successful resolution to all concerns noted. The response utilizes the order and structure of the audit report. The finding statements as contained in the audit report were edited to remove the specific case examples cited as well as any attached dollar amounts to support a focus on the deficiency condition.

Observation #1:	Criteria:	Compliance and Internal Control – Repeat Observation
1. Per Code of Virginia §2.2-5212, access to the state pool of funds includes determination through the use of a uniform assessment instrument and process. The Child and Adolescent Needs and Strengths (CANS) Assessment is the approved uniform assessment instrument per CSA policy adopted in 2009. The CANS assessment is required initially, annually, and upon discharge from the CSA process. An annual CANS had not been completed for three (3) client case files examined. This non-compliance observation was identified in the OCS audit report dated April 4, 2017. Rappahannock CSA Office subsequently reported to OCS that the quality improvement plan submitted in response to the observations reported had been implemented. The CPMT, as the governing body, is responsible for on-going monitoring of the quality		

improvement plan to ensure timely implementation of the plan and the actions taken are continuously working as intended.

2. Rappahannock County CSA program funded family support services (counseling services) between April 2019 through July 2019 for one (1) client that was not documented on an individual family service plan (IFSP). This non-compliance observation was identified in the OCS audit report dated August 27, 2018. Rappahannock CSA Office subsequently reported to OCS that the quality improvement plan submitted in response to the observations reported had been implemented. The CPMT, as the governing body, is responsible for on-going monitoring of the quality improvement plan to ensure timely implementation of the plan and the actions taken are continuously working as intended.
3. SEC policy 6.3 Community-based Behavioral Health Services (CBBHS) requires the FAPT to maintain documentation that a child meets the criteria established by the Department of Medical Assistance Services (DMAS) eligibility for specific CBBHS to access state pool funds. An assessment by a licensed mental health professional was not provided as verification for one client where CSA funded Intensive In-home (IHH) services.
4. Per Code Virginia (COV) 6.2-5212, eligibility to access state pool funds requires placement for purposes of special education in approved private school educational programs which is evidenced by the student's approved individualized education program (IEP). One (1) student did not have an approved IEP when services were rendered.
5. Expenditures incurred for CSA funded services were not always recorded in the correct expenditure category for financial reporting.

Recommendation

1. Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding. Adequate documentation, such as but not limited to, administration of annual CANS assessment, documentation on service plan and eligibility determination and current IEPs should be maintained as justification for CPMT funding decisions.
2. The CPMT and/or the fiscal agent should implement a quality assurance review of all transactions to ensure transactions are recorded properly in the Local Expenditure Data and Reimbursement System (LEDRS) prior to the submission of the monthly pool fund reimbursement report.
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 based on SEC approved policy 4.7 Response to Audit Findings of whether the identified actions are acceptable or any additional actions that may be required.

Client Comment

Management agrees with the auditor's comments and the following actions are either underway or proposed to address the deficiencies noted.

- The local policy manual is being reviewed for opportunities to provide more specific instruction and description of roles and responsibilities in the areas of: case documentation forms, documentation content, eligibility determination, emergency funding documentation, and other areas that support the timely and accurate service planning, funding authorization, reimbursement reports, and management review; as well as other deficiencies in policy content that may be found during the review.
- Appropriate check lists, tips sheets, FAQs and other tools will be created as appropriate to case manager, FAPT Member, CPMT member needs.
- A Quality Improvement Plan will be developed and submitted by the CPMT for review by the OCS Finance Office that will identify CPMT's position on the specific observations related to questioned costs and will provide action plans with timeframes that will target the areas noted for remediation or improvement. The QIP will, with the permission of the OCS Finance Office, build upon the existing QIP currently underway and may include an extension of timelines included in the current QIP.

While the agency acknowledges that findings contained in this current audit report are the same or similar to findings in prior year audit reports, the agency also notes that full and sustained deployment of corrective actions initiated in response to the earlier findings were hindered by an extended period of instability in the CSA Coordinator position as well as turn-over in other key positions. New staff members in the Rappahannock Department of Social Services with responsibilities in the Rappahannock CSA program are anticipated to greatly enhance the locality's success in achieving sustained improvement in the areas noted in the audit.

Observation #2:**Criteria****Compliance and Internal Control**

Adequate measures were not always consistently applied to ensure effective and efficient use of financial resources that could be used to offset the costs incurred for CSA pool funded services. Assessments of parental co-payments were not documented to evidence parental ability to share financial responsibility for costs associated with services provided to three (3) eligible youth, including non-educational services provided to youth meeting the special education mandate criteria. In a review of the LEDRS refund report it was determined that zero (\$0) co-payment collections were reported from 2012 through 2020. Under these conditions, the opportunity lost for collection of additional funds is significant and could materially impact the local program's ability to increase funding availability for services required to meet the needs of the community.

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Recommendation

The CPMT should ensure that the FAPT and the CSA Coordinator documents parental ability to pay, supported by verification of stated income in accordance with the COV §2.2-5208 item 6. The amount assessed should be reported to the CPMT along with the request for approval for funding of FAPT referred services. Such documentation should be retained in the case file for the required records retention period.

Client Comment

Management agrees with the auditor's comments and is in the process of conducting a review of current policies and forms related to parental co-pays. As stated in Client Comment for Observation #1, the local policy manual is being reviewed for opportunities to provide more specific instruction and description of roles and responsibilities which will include the responsibilities of communicating the role of parental co-pays to families accessing CSA funded services and in the timely and accurate completion of clear, user-friendly parental pay assessment forms/good cause determination forms; as well as retaining documentation in the case record.

Observation #3:

Criteria

Compliance and Internal Control

COV §2.2-5210 requires that consent-to-exchange information be obtained from the parent and/or legal guardian to share client information collected by partnering agencies and other providers with the local CSA representatives. The consent to exchange information form was missing in one (1) of five (5) 20% files tested, which was applicable to client special education services. Failure to document that consent was properly obtained increases the likelihood of non-compliance with CSA and other agency statutory requirements and potential liability due to the unauthorized exposure of protected information. OCS Administrative Memo #18-01, issued January 11, 2018, informs local CSA program that: "Without such information, CPMTs cannot verify that the students are statutorily eligible for CSA funded services and would therefore be unable to authorize the use of CSA funds to cover the costs of private educational placements required by the student's IEP." Where the local CSA office is unable to confirm eligibility to access state pool funds due to the absence of consent, the local school division would have been responsible for \$34,826.25 in expenditures incurred that were funded by CSA during the audit period. Without parental consent, local school divisions cannot share student's educational records (including IEPs) with the CPMT. This includes the student's "directory information" as well as the educational record. Such disclosure without parental consent constitute a violation of Family Educational Rights and Privacy Act (FRRPA). It should be noted that the client began receiving CSA funded services prior to the issuance of Administrative Memo #18-01.

Recommendation

The Rappahannock County CSA Office and FAPT should ensure that consent to exchange information forms have been completed at the time of referral or immediately prior to the start of

the FAPT meeting for all CSA funded cases, including IEP referrals, to be in compliance with OCS directives and the Family Educational Rights and Privacy Act.

Client Comment

Management agrees with the auditor's comments and took immediate action to review all active CSA cases for an appropriately executed and current Consent to Release Information Form; create a Consent to Release Information Form that reflects all categories of information to be shared, identifies by name all entities that are party to the consent, and clearly states an expiration date/event; contacted parents/legal guardians where case records did not contain a current Consent to Release Information form and corrected the deficiency; and is in process of replacing all existing consent forms with the revised form as the case returns to FAPT. As an additional step, the Consent to Release Information Form will be included in the checklist tools kit referenced in the Client Comment attached to Observation #1.

Observation #4:**Criteria****Compliance and Internal Control**

Documentation of utilization review (UR) in service planning activities requires strengthening to ensure compliance with program requirements and best practices. Utilization reviews of services documented in the approved service plans and funded by the state pool were not performed in 3 of the 5 client records examined. COV §2.2-5208 item 5 (iv) task the FAPT to "provide regular monitoring and utilization review of the services and residential placement for the child to determine whether the services and placement continue to provide the most appropriate and effective services for the child and his family".

Recommendation

In accordance with COV §2.2-5208 item 5 (iv) and local policy, the CPMT should ensure that the FAPT performs UR of all services recommended and funded by the state pool. Periodic review of individual client records should be conducted by person(s) independent of FAPT to verify compliance.

Client Comment

Management agrees with the auditor's comments and plans to strengthen local policy and procedures to more clearly define roles and responsibilities as well as include UR activities/documentation in the checklist tools kit referenced in the Client Comment attached to Observation #1. The CPMT will review potential sources of regular, periodic independent review, either by staff of CPMT member organizations or other qualified party, to ensure UR is a consistent practice in all CSA cases.

The Rappahannock CPMT and staff working within the Rappahannock CSA program appreciate the importance of rectifying the deficiencies noted in the audit report and are committed to full resolution in the timeliest manner possible. Our goal is to enhance and expand as needed the local

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framework of policy and practice to reduce the opportunity for error or lapses in performance; support the on-boarding of new staff; facilitate the transfer of knowledge during transitions in key positions; maintain accountability to stakeholders; but most of all, ensure our children and families access the most appropriate services in the most effective and timely manner through the proper ways and means.

Following the release of the final report, Rappahannock CPMT will submit an updated and expanded Quality Improvement Plan that, once accepted by the OCS Finance Office and OCS Executive Director, will be a standing agenda item for CPMT until the plan's full completion. Periodic review of status of action plan outcomes will be part of future CPMT agendas to ensure sustained success. We look forward to working with OCS on this endeavor and it is our hope that with this commitment of current and future resources to the oversight of CSA activities, OCS will render a favorable decision regarding the questioned costs contained in the program audit report.

Respectfully,



Gail Crooks
CPMT Chair/Director of Social Services
Rappahannock County