



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 15, 2019

Mr. Christopher Austin, CPMT Chair
Smyth County CSA Program
121 Bagley Circle, Suite 200
Marion, VA 24354

RE: Smyth County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 35-2019

Dear Mr. Austin,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Smyth 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 April 25, 2019 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 Smyth County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Smyth 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 with the statutory requirements of CSA. This is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Smyth County CSA Program are detailed on pages two through three.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Seven client case files were examined to validate conclusions reported by the Smyth County CPMT. At least one exception was noted in six (86%) of seven cases examined. The results of that review indicate improvement is needed in the pertaining to disbursement of CSA pool funds, which resulted in the request and reimbursement of \$12,630 (state share) in fiscal years 2018-2019 for expenditures incurred that did not meet compliance requirements of CSA. Exceptions as noted in the table below are deemed significant, as they are critical to evidencing compliance with CSA funding requirements.

Client File Review Exception Summary and Detailed Cost Breakdown					
Exception Rate		Description			
14% (1 of 7)		A. FAPT referral and assessment not completed within 14 days of placement. (COV § 2.2-5209)			
14% (1 of 7)		B. Pool funds expended where eligibility for another funding source (Title IV-E) was denied due to absence of attainable documentation. (COV § 2.2-5211).			
43% (3 of 7)		C. Evidence of CPMT authorization of funding. (COV § 2.2-5206)			
43% (3 of 7)		D. Services funded were not evidenced in an Individual and Family Services Plan (COV § 2.2-5208 and CSA Policy Manual Section 3.5, Records Management)			
43% (3 of 7)		E. Discharge Child and Adolescent Needs and Strengths (CANS) assessment was not completed. No applicable fiscal impact. (CSA Policy Manual 3.6, Mandatory Uniform Assessment Instrument)			
Client #	Exception	Service Description	Period	Total	State Share
04	C and D	Couples Counseling	4/18 – 5/18	\$560	\$495
08	A	Congregate Care	5/18	\$2,660	\$1,883
12	C	Intensive Care Coordination	3/18	\$1,679	\$1,482
12	D	Intensive Care Coordination	6/18 – 8/18	\$467	\$413
28	B	Foster Care Maintenance	4/18 – 8/18	\$4,436	\$3,399
28	B	Day Care	6/18 – 8/18	\$1,035	\$793
28	C	Parent Assessment/Counseling	5/18 – 7/18	\$2,430	\$2,146
89	D	Case Support	3/18 – 2/19	\$2,286	\$2,019
				\$15,553	\$12,630

RECOMMENDATIONS

1. Prior to service planning, 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, to include:
 - A. timely referral and assessment by FAPT for emergency placements, and
 - B. timely completion of CANS assessments.

RECOMMENDATIONS CONTINUED

2. Someone other than the CSA Coordinator should perform periodic case reviews 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 incorporating use of the [CSA Documentation Inventory](#), which is available on the CSA website.
3. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding and use of alternate funding sources where eligible and appropriate.
4. 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.

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Smyth 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 Kendra Hayden, CSA Coordinator during our on-site visit. Ms. Hayden'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
Michael L. Carter, Smyth County Administrator
Scott Simpson, CPMT Fiscal Agent
Kendra Hayden, CSA Coordinator