



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 2, 2017

Dr. Tonia Taylor, CPMT Chair
Southampton County Public Schools
21308 Plank Road
Courtland, VA 23837

RE: Southampton County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 52-2015

Dear Dr. Taylor,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Southampton 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 5, 2016 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 Southampton County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Southampton County CPMT. We agree that no significant internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of Southampton County CSA. However, we do not agree with the Southampton County CPMT's conclusion that there were no significant non-compliance observations. The explanations for our assessment results are as follows:

Validation procedures of the locally prepared CSA Self-Assessment Workbook noted deficiencies that resulted in non-compliance with the Children's Service Act by the local CSA program. Non-compliance with the statutory requirements of the Children's Services Act is deemed significant because the local program is not fully operating in accordance with the laws of the Commonwealth of Virginia. Specifics pertaining to the Southampton County CSA Program are detailed on page 2 of this report.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS	
	<p>1. Statements of Economic Interest Forms were not completed by the parent and private provider representatives of the Community Policy and Management Team (CPMT) and the Family Assessment and Planning Team (FAPT). The Code of Virginia (COV) Children’s Services Act requires an annual disclosure of the economic interests of non-public members of the CPMT and FAPT to safeguard against conflicts of interest pertaining to the referral of services and authorization of CSA Pool Funds on behalf of eligible youth and families. <i>Criteria:</i> COV § 2.2-5205 and COV § 2.2-5207</p>
	<p>2. Child and Adolescent Needs Strengths (CANS) assessments were not always completed in accordance with CSA policies. A discharge CANS assessment was not completed for the two (2) applicable cases out of the three (3) cases selected for validation. A comprehensive CANS assessment is required initially, annually, and upon discharge of CSA funded services. The data collected is used to evaluate outcomes and to inform decision making at the state and local level, which is dependent upon complete, accurate, and reliable information. <i>Criteria:</i> <u>CANS Frequency of Administration - Updated 2013</u></p>
Recommendation	<p>1. The Southampton County CPMT should take appropriate action to ensure that Statements of Economic Interest Forms are obtained immediately and establish a process to ensure continued compliance.</p> <p>2. The Southampton County FAPT should ensure that a discharge CANS is completed once services have ended. A quality assurance process should be developed to include periodic reviews of client case files to ensure required information has been collected and retained.</p>
Client Comment	<p>1. In accordance with the direction and guidance we received during the self-assessment validation process, Statements of Economic Interests forms were promptly obtained from the identified FAPT and CPMT members.</p> <p>2. The addition of CANS data and information (e.g. status of staff CANS certifications, completion of required CANS assessments) to monthly/quarterly UM reports has improved the CPMT’s ability to monitor compliance with statutory requirements.</p>

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The Office of Children's Services respectfully request 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 task are completed. OCS will conduct a follow-up validation to ensure quality improvements are implemented as reported.

We would like to thank the Southampton County CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the assistance and cooperation that was provided by Amy Lehman, CSA Coordinator during our on-site visit. Ms. Lehman's efforts enabled the audit staff to quickly 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 W. Johnson, Southampton County Administrator
Lynette Lowe, CPMT Fiscal Agent
Amy Lehman, CSA Coordinator