



COMMONWEALTH of VIRGINIA

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

SCOTT REINER, M.S.
Executive Director

March 9, 2017

Ms. Robin Boyd, CPMT Chair
Clinch Valley Community Action
Post Office Box 188
North Tazewell, VA 24630

RE: Tazewell County CSA Program Self-Assessment Validation, File No. 30-2014

Dear Ms. Boyd,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2016, the Tazewell County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 21, 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 Tazewell County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Tazewell County CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of the Tazewell County CSA program. The explanation for our assessment results are as follows:

Tazewell County CPMT concluded that only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified major deficiencies indicating non-compliance in the local CSA program. 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 Tazewell County CSA Program are detailed on pages 2-3.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. The Tazewell County CPMT has not coordinated and documented a formal long-range plan that includes an assessment of the current risks, strengths and needs of the existing program. The CPMT has not explicitly identified and documented performance measures, objectives, strategies to aid in evaluating the effectiveness and accountability 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 formal planning, coordination, and program evaluation to ensure that the goals and objectives of the program are met may affect the integrity of the CPMT's governance activities, maximizing the use of state and community resources, and ultimately local efforts to better serve the needs of youth and families in the community.

CRITERIA: Code of Virginia (COV) 2.2-COV 2.2-5206 Item 4

2. Internal Controls established by the CSA statutes were not effectively implemented by the CPMT in order to safeguard against conflicts of interest. The SOEI form was not completed by the Parent and Private Representative on the CPMT and Private Provider Representatives on FAPT. Based on the possibility that required parties may not have appropriately disclosed personal interests and the opportunity for the same individuals to engage in both the referral and approval of CSA funded services, the effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds could be significantly reduced.

CRITERIA: Code of Virginia (COV) 2.2.-5205, 2.2.-5207

3. Policies and procedures adopted by the CPMT contain contradictory language to the COV regarding services that may be exempted from FAPT. Tazewell County CSA local policy: Utilize CSA Funding- Maintenance Payments states the following: "Family foster care maintenance payments and Independent Living Stipends will not be reviewed by the FAPT or the CPMT. These cases will have administrative reviews by case worker and supervisor to insure case is correct and information is added into the CSA data set". The COV allows for the exemption of foster care maintenance payments at the discretion of the local CPMT not be heard by FAPT. However, an Independent Living Stipend is not a foster maintenance payment; therefore, it does not meet the COV exemption.

CRITERIA: COV 2.2.-5208; Virginia Department of Social Services (VDSS) Foster Care Policy Manual Section 17 Funding Maintenance Cost

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

4. Improvement is needed with respect to consistency in the documentation and retention of service planning records. Client Case files did not always contain sufficient information demonstrating compliance with CSA requirements key to coordination and planning by FAPT. Documentation that could not be verified from the client case files and/or were not available for review included, but were not limited to, consent to exchange information and discharge CANS.

Insufficient data collection and poor document management of service planning may lead to increased operational and fiscal inefficiency/ineffectiveness of the local program. Further, the local program is at risk of potential loss of accessibility for reimbursement of the state share of pool fund reimbursements for expenditures authorized based on the service planning recommendation of the FAPT that is not fully compliant with CSA statutes and related policies and procedures required to access state pool funds.

CRITERIA: COV 2.2.-5208, CSA Policy Manual Section 3.5, Records Management, CANS Frequency of Administration updated 2013

RECOMMENDATIONS

- The Tazewell County CPMT should coordinate with CSA stakeholders to develop, document, and implement a long range plan to guide the locally administered CSA program. The process should include development of a formal risk assessment process and measurable criteria to be used for evaluation of program accountability and effectiveness. The CPMT could initiate the discussion using information collected in the most recent Annual Service GAP Survey that has been completed by the Tazewell County CPMT.
- The CPMT should ensure that the SOEI forms are completed immediately for all non-public participating members of the CPMT and FAPT. Forms should be updated annually and retained in accordance with records retention procedures.
- The CPMT should initiate an immediate review of Tazewell County documented CSA policies and procedures, which should be revised as necessary to reflect current state and local CSA practices and requirements. Specifically, in their review they should ensure that CSA Pool Fund Expenditure policy aligns with the Code of Virginia regarding services exempted from FAPT.

RECOMMENDATIONS

- 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. Periodic case reviews should be performed by someone other than the CSA Coordinator to establish quality control of client records and to ensure compliance with CSA policy and statutory requirements.

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 Tazewell County Community Policy and Management Team 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 that was provided by Ms. Shanun Smith, CSA Coordinator during our on-site visit. Her 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,



Annette E. Larkin
Program Auditor

cc: Scott Reiner, Executive Director
Patricia Green, County Administrator
and Fiscal Agent
Shanun Smith, CSA Coordinator
Stephanie Bacote, OCS Program Audit Manager
SEC Finance and Audit Committee