



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 27, 2018

Mr. Rob Hiatt, Acting CPMT Chair
Department of Juvenile Justice
55 Commerce Street
Pulaski, VA 24301

RE: Wythe County CSA Program Self-Assessment Validation, File No. 26-2018

Dear Mr. Hiatt,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2018, the Wythe 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 25, 2018 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 Wythe County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Wythe County CPMT concluded that no significant non-compliance observations and/or internal control weaknesses were noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified 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 Wythe County CSA Program are detailed on pages two (2) through four (4).

SIGNIFICANT NON-COMPLIANCE and REPEAT OBSERVATIONS

1. Membership of the Family Assessment and Planning Team (FAPT) was not consistent with state and locally established requirements. The composition of the Wythe County FAPT does not include a parent representative in accordance with Code of Virginia (COV) §2.2-5207. The absence of the parent representative impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community.

CRITERIA: Code of Virginia (COV) §2.2-5200 and §2.2-5207

2. Six (6) client files were selected to validate conclusions reported by the CPMT. The results of that review indicate improvement is needed in the documentation of service planning, funding decisions, and utilization reviews. At least one exception was noted in 66% (4 of 6) of the case files reviewed. The exceptions described below are deemed significant, as they are critical to evidencing compliance with CSA funding requirements regarding eligibility to access funds and appropriateness of services.

EXCEPTION DESCRIPTION	ERROR RATE
A. Missing documentation: Virginia Enhanced Maintenance Assessment Tool (VEMAT), independent living agreement, or provider treatment plan and provider progress reports	50% (3 of 6)
B. Missing key data element from the Individual Family Services Plan (IFSP): discharge planning.	50% (3 of 6)

CRITERIA: COV 2.2-5205; 2.2-5208; 2.2-5210; 2.2-5212; Policy Manual for the Children’s Services Act (CSA Policy Manual), Section 3.5 Records Management VDSS Child and Family Services Manual E Foster Care Section 17 Funding Maintenance Cost

3. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with COV 2.2-5206, items 6 and 13. CPMT monthly meeting minutes and accompanying reports did not evidence utilization management/utilization review (UM/UR) activities to include:

- A. reviewing local and statewide data provided in the management reports on the number of children placed out of state, demographic, types of services provided, duration of services, services expenditures, child and family outcomes, and performance measures.
- B. tracking the utilization and performance of residential placements using data and management reports to develop and implement strategies for returning children placed outside of the Commonwealth, preventing placements, and reducing lengths of stay in residential programs for children who can appropriately and effectively be served in their home, relative’s homes, family-like setting, or their community.

Utilization management is a key element in the CPMT’s monitoring activities and assessing the appropriateness and effectiveness of services purchased, which is critical to ensure the CPMT is well informed when carrying out its decision-making responsibilities. This non-compliance observation was also identified in the prior audit report issued May 9, 2017.

CRITERIA: (COV) 2.2-5206 items 6, and 13

SIGNIFICANT NON-COMPLIANCE and REPEAT OBSERVATIONS - CONTINUED

4. Expenditure reimbursements were requested and processed for payment of services where the requirement for compliance with State CSA policies and procedures were not met. Exceptions were noted as follows for 50% (3 of 6) of client files reviewed:
 - A. The Virginia Enhanced Maintenance Assessment Tool (VEMAT) was not completed within the 60-day window allowable per Virginia Department of Social Services (VDSS) foster care policies governing enhanced maintenance. VDSS policy states, "If the LDSS does not conduct the VEMAT within the state definition of 60 days, local only funds shall be used from the first of the month following until the VEMAT is completed." However, CSA funded enhanced maintenance payments continued beyond the allowable 60-day period for one (1) of the six (6) client files examined. The total questioned cost equaled \$817 (state share).
 - B. Per the COV 2.2-5212, access to funding for services through the state pool of funds requires determination through use of a uniform assessment instrument and process and by policies of the CPMT. The Child and Adolescent Needs and Strengths (CANS) assessment is the approved uniform assessment instrument per CSA policy adopted in 2009. An annual CANS had not been completed for one (1) of the six (6) case files examined, resulting in \$3,287(state share) in questioned costs. This non-compliance observation was also identified in the prior audit report issued May 9, 2017.
 - C. CPMT authorized \$2,700 to fund community-based services for one (1) of six (6) client files reviewed. However, the total amount expended exceeded the funding authorized by CPMT by \$1,950. The total questioned cost equaled \$1,686 (state share).

Client	Error Type	Services	Period	Total Cost	State Share
A	1	Foster Care Maintenance	Oct 2018	\$1,120	\$817
B	2	Independent Living Stipend	Jul 2017 – Feb 2018	\$4,508	\$3,287
C	3	Assessment/Evaluation	Sept 2017	\$1,950	\$1,686
Total				\$7,578	\$5,790

Error Type: 1-VEMAT; 2- Annual CANS; 3- CPMT Funding Authorization

CRITERIA: COV 2.2-5206; 2.2-5212; SEC Policy 3.6 - Virginia Children and Adolescents Needs Strength (CANS) Assessment; [CANS Frequency of Administration - Updated 2013](#); and _VDSS Child and Family Services Manual, Section E.17 Funding Maintenance Cost

RECOMMENDATIONS

1. The CPMT should secure parent representatives for FAPT in accordance with state statutes and local policy. In addition, the CPMT should document their recruitment efforts in the CPMT minutes.
2. 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 to substantiate services recommended to CPMT for funding authorization.
3. 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 adopting guidelines pertaining to [CSA Documentation Inventory](#) and [Utilization Review Guidelines](#), which are published on the CSA website
4. The CPMT should periodically review local and statewide data provided in OCS management reports located on the CSA website specifically, but not limited to:
 - a. <http://www.csa.virginia.gov/OCSDData/ReportsPublications>
 - b. [State & Local CSA Performance Measures \(Excel Application\)](#)
 - c. [CSA Utilization Reports](#)
5. The CPMT should consider adding utilization management as a standing agenda item for their regularly scheduled CPMT meetings. The recorded minutes of the CPMT meeting should reflect a summary of CPMT's discussions and actions to be taken, if any. A copy of reports reviewed should be retained with the minutes.
6. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding.
7. 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.

Mr. Rob Hiatt, Acting CPMT Chair

August 27, 2018

Page 5

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 Wythe 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 assistance and cooperation that was provided by Ms. Teena Bishop, CSA Coordinator, during our on-site visit. Ms. Bishop'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
Stephen D. Bear, Wythe County Administrator
Kimberly Ayers, Director
Wythe County Department of Social Services
Teena Bishop, CSA Coordinator
Lori C. Guynn, CPMT Fiscal Agent
SEC Finance and Audit Committee