

<b>Name:</b> Micah Campbell	<b>Affiliation:</b> Parent	<b>Date Posted:</b> 10/28/2017
<p>This proposed SEC Policy is long overdue. I would emphasize the need to include families in every step of the process. Families should not be excluded from developing IFSPs and families should not be excluded from participating in the CANS Assessment.</p> <p>Speaking as a parent whose child was in an outside placement and using CSA funds, we learned that the locality was conducting the CANS Assessment without our knowledge, input, or consent. We also learned that the locality held at least one FAPT meeting and discussed our family without inviting us or seeking our input before rendering decisions that impacted our son. These actions directly contradict the ethics and mission of the OCS. When I informed OSC of these actions - nothing changed.</p>		

## Reiner, Scott (CSA)

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**From:** Pemberton, Catherine (VDSS)  
**Sent:** Tuesday, November 07, 2017 3:58 PM  
**To:** OFFICE OF CHILDRENS SERVICES  
**Subject:** Comments on SEC Policy 4.7 response to Audit Findings

Good afternoon:

On behalf of the Virginia League of Social Services Executives, we offer the following comments related to the SEC Policy 4.7 Response to Audit Findings with Regard to the Children's Services Act:

1. We request clarification in the definition of "Repeat or subsequent violation" in section 4.7.3. The first sentence indicates such violations occur in two successive audit cycles. The second sentence indicates a repeat finding may occur "on any occasion" on which follow-up monitoring occurs. The second sentence of the definition appears to disregard the requirement of two success audit cycles.
2. We also request adding language to Section 4.7.4.1 Level Three Noncompliance Finding/ Section B, Examples of Level Three Specific Noncompliance Findings, #7. We recommend including "to the extent that funds are available and the service is CSA-eligible."

The Virginia League of Social Services Executives appreciates the opportunity to provide these comments related to the proposed denial of funds policy.

Sincerely,

*Catherine Pemberton*

Director, Powhatan Department of Social Services  
President, Virginia League of Social Services Executives  
3908 Old Buckingham Road  
Powhatan, Virginia 23139  
804-598-5630 X 2405



**VISION:**

Children live safely and productively with their families and in their schools and communities

Office of Children's Services  
1604 Santa Rosa Road, Suite 137  
Richmond, VA 23229

ATTN: Public Comment

Dear Scott:

On behalf of the Albemarle and Charlottesville Community Policy and Management Teams, we offer the following comments related to the SEC Policy 4.7 Response to Audit Findings with Regard to the Children's Services Act:

1. We request clarification in the definition of "Repeat or subsequent violation" in section 4.7.3. The first sentence indicates such violations occur in two successive audit cycles. The second sentence indicates a repeat finding may occur "on any occasion" on which follow-up monitoring occurs. The second sentence of the definition appears to disregard the requirement of two successive audit cycles.
2. We also request adding language to Section 4.7.4.1 Level Three Noncompliance Finding/ Section B, Examples of Level Three Specific Noncompliance Findings, #7. We recommend including "*to the extent that funds are available and the service is CSA-eligible.*"

We appreciate the opportunity to provide these comments related to the proposed denial of funds policy.

Sincerely,

Phyllis C. Savides, Chair  
Albemarle CPMT

Kaki Dimock, Chair  
Charlottesville CPMT

**CORE VALUES:**

**CONNECTED.**  
Young people thrive with caring adults and families

**ENGAGED.**  
Families and young people are engaged in decisions about their care

**PRODUCTIVE.**  
Services are meaningful and responsive to children's needs

**LOCAL.** Children are best served in their home communities

## Reiner, Scott (CSA)

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**From:** Irvine, Kimberly <kimberly.irvine@yorkcounty.gov>  
**Sent:** Monday, November 20, 2017 7:56 AM  
**To:** Reiner, Scott (CSA)  
**Subject:** Comments for OCS denial of funds

Scott,

This is the only comment I had on the last draft of OCS denial of funds:

I would like clarity on the definition of 'repeat or subsequent violation' on page 2 (excerpt below). The first sentence indicates such violations occur in 2 successive audit cycles, i.e., the same finding occurs in each of 2 successive 3 year audit periods. The second sentence indicates a repeat finding may occur 'on any occasion' on which follow-up monitoring occurs. The second sentence of the definition appears to disregard the requirement of two successive audit cycles.

"Repeat or subsequent violation" means a locality, in two successive audit cycles, violates the same policy, regulatory, or statutory requirement (e.g., failure to complete the CANS assessment). Repeat or subsequent findings may occur on the next regularly scheduled audit or on any occasion on which follow-up monitoring of previously agreed upon corrective action occurs.

Thanks for the opportunity to provide feedback.

**Kimberly Irvine, Director, MPA, SPHR**  
**York-Poquoson Social Services**  
**301 Goodwin Neck Road**  
**Yorktown, VA 23692**  
**kimberly.irvine@yorkcounty.gov**  
**757-890-3939**

*Assist in meeting the basic needs of our citizens*  
*Promote self-sufficiency*  
*Protect vulnerable children and adults*  
*- from the York-Poquoson DSS Mission Statement*



***Botetourt County, Virginia  
Office of Children's Services***

*Botetourt County  
CSA Coordinator  
1 West Main Street, Box 9  
Fincastle, VA 24090*

*Phone: (540) 928-2088 or 2089  
FAX: (540) 473-8628*

November 21, 2017

The Honorable William A. Hazel, Jr. M.D.  
Secretary of Health and Human Resources  
Chair of State Executive Council for Children's Services  
Office of Children's Services for At-Risk Youth & Families  
1604 Santa Rosa Road, Suite 137  
Richmond, Virginia 23229

Re: Response to Audit Findings with Regard to Children's Services Act (CSA)

Dear Secretary Hazel:

The Botetourt County Community Policy and Management Team (CPMT) has reviewed the revised draft of the proposed State Executive Council (SEC) Policy 4.7, Response to Audit Findings with Regard to Children's Services Act (CSA). The CPMT appreciates the revisions that were made to the original policy draft after the initial public comment period, particularly related to the addition of code section citations and more specific language regarding examples and responses to the levels of noncompliance findings.

At this time, we would request that one additional recommendation be considered prior to implementation of this policy. While many of the specific finding examples are linked to a code or policy under the authority of the SEC, there are two level one noncompliance findings that we question whether or not are in the SEC's purview to regulate. Level one findings related to fiscal controls and technology controls are not specified in law and although the standards cited in the revised draft are certainly appropriate and delineate best practices, these may be outside of the scope of what CPMTs are required to do under the Children's Services Act. As such, we respectfully recommend that these examples of noncompliance findings be removed from the policy prior to adoption.

We appreciate your consideration of our recommendation.

Respectfully,

A handwritten signature in cursive script, appearing to read "Sandra Moran".

Sandra Moran  
CSA Coordinator on behalf of Botetourt CPMT



# ROANOKE COUNTY

DEPARTMENT OF SOCIAL SERVICES  
OFFICE OF CHILDREN'S SERVICES  
P.O. Box 1127  
Salem, Virginia 24153-1127



TEL: (540) 283-8803  
FAX: (540) 387-6195

November 21, 2017

The Honorable William A. Hazel, Jr. M.D.  
Secretary of Health and Human Resources  
Chair of State Executive Council for Children's Services  
Office of Children's Services for At-Risk Youth & Families  
1604 Santa Rosa Road, Suite 137  
Richmond, Virginia 23229

Re: Response to Audit Findings with Regard to Children's Services Act (CSA)

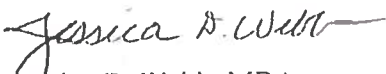
Dear Secretary Hazel:

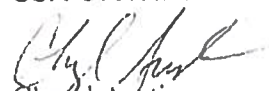
The Roanoke County Community Policy and Management Team (CPMT) has reviewed the revised draft of the proposed State Executive Council (SEC) Policy 4.7, Response to Audit Findings with Regard to Children's Services Act (CSA). The CPMT appreciates the revisions that were made to the original policy draft after the initial public comment period, particularly related to the addition of code section citations and more specific language regarding examples and responses to the levels of noncompliance findings.

At this time, we would request that one additional recommendation be considered prior to implementation of this policy. While many of the specific finding examples are linked to a code or policy under the authority of the SEC, there are two level one noncompliance findings that we question whether or not are in the SEC's purview to regulate. Level one findings related to fiscal controls and technology controls are not specified in law and although the standards cited in the revised draft are certainly appropriate and delineate best practices, these may be outside of the scope of what CPMTs are required to do under the Children's Services Act. As such, we respectfully recommend that these examples of noncompliance findings be removed from the policy prior to adoption.

We appreciate your consideration of our recommendation.

Respectfully,

  
Jessica D. Webb, MBA  
CSA Coordinator

  
Cheryl Austin  
CPMT Chair