

AGENDA
State Executive Council for the Children's Services Act
June 15, 2017

Office of Children's Services
Richmond/Henrico Rooms
1604 Santa Rosa Road
Richmond, VA

- 9:30 a.m.** **Welcome and Chair Remarks – Dr. Bill Hazel**
 ➤ **Action Item** – Approval of March 2017 Minutes
- 9:50 a.m.** **Public Comment**
- 10:00 a.m.** **Executive Director's Report – Scott Reiner**
 • FY2018 CSA Training Plan
 ➤ **Action Item** – Approval of FY2018 CSA Training Plan
 • FY2017 Expenditure Status Update
 • Recap – 6th Annual CSA Conference
 • Status Report on Private Day Education Workgroup
- 10:20 a.m.** **SLAT Report – Dr. Tamara Temoney**
 ➤ **Action Item** – Approval of reappointment of SLAT Members representing the Virginia Association of Community Services Boards for three-year terms beginning July 1, 2017.
 ○ Charles Walsh, Primary
 ○ Ivy Sager, Alternate
- 10:30 a.m.** **Proposed SEC Policy on Response to Audit Findings – Janet Van Cuyk**
 • Summary of Public Comment Received
 ➤ **Action Item** – OCS Response to Audit Findings (SEC Policy 4.7)
 ○ Approval of Proposed Stage and Public Comment Period (August 18, 2017)
- 10:45 a.m.** **SEC Policy Initiative – Janet Van Cuyk**
- 11:00 a.m.** **Presentation: Virginia Plan for Well-Being - Virginia Department of Health**
 Chris Gordon, Chief of Staff, Community Health Services
 Leslie Hoglund, Ph.D., Director of Family Health Services
- 11:30 a.m.** **Member Updates**
- 12:00 Noon** **Adjournment**

2017 Meeting Schedule: September 21; December 14

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**STATE EXECUTIVE COUNCIL (SEC)
FOR CHILDREN'S SERVICES
Virginia Department of Taxation
1957 Westmoreland Street
Richmond, VA
Thursday, March 23, 2017**

SEC Members Present:

The Honorable William A. (Bill) Hazel, Jr., M.D., Secretary of Health and Human Resources (*Chair*)
Jack Barber, Interim Commissioner, Virginia Department of Behavioral Health
and Developmental Services
The Honorable Mary Biggs, Member, Montgomery County Board of Supervisors
Andrew Block, Director of the Department of Juvenile Justice
Courtney Gaskins, Ph.D., Director of Program Services, Youth for Tomorrow
Bob Hicks for Dr. Marissa Levine, Commissioner, Virginia Department of Health
Cindi Jones, Director, Department of Medical Assistance Services
Maurice Jones, City Manager, City of Charlottesville
Elizabeth O'Shea, Parent Representative
Greg Peters, President and CEO, UMFS
R. Morgan Quicke, County Administrator, Richmond County
The Honorable Frank Somerville, Presiding Judge, 16th Judicial District, Juvenile and Domestic
Relations District Court
Tamara Temoney, Ph.D., Chair, State and Local Advisory Team (SLAT)
Jeanette Troyer, Parent Representative
The Honorable Jennifer Wexton, Member, Senate of Virginia

SEC Members Absent:

The Honorable Richard "Dickie" Bell, Member, Virginia House of Delegates
Sophia Booker, Service Recipient Representative
John Eisenberg, for Steven Staples, Ed.D., Superintendent of Public Instruction, Virginia Department
of Education
The Honorable Catherine Hudgins, Member, Fairfax County Board of Supervisors
Sandra Karison for Karl Hade, Executive Secretary of the Supreme Court of Virginia
The Honorable Sheila Olem, Council Member, Town of Herndon
Margaret Schultze, Commissioner, Virginia Department of Social Services

Other Staff Present:

Scott Reiner, Executive Director, OCS
Eric Reynolds, Assistant Attorney General, Office of the Attorney General
Marsha Mucha, Administrative Staff Assistant, OCS

Call to Order and Approval of Minutes

Secretary Hazel called the meeting to order at 9:35 a.m. and welcomed everyone. He welcomed Elizabeth (Beth) O'Shea as a new parent representative to the SEC replacing Eddie Worth. Introductions were made. Secretary Hazel presented appointment certificates and pins to Ms. O'Shea and Judge Somerville.

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The minutes of the December 15, 2016 meeting were approved without objection.

Public Comment

There was no public comment.

Executive Director's Report

Mr. Reiner reported on the following items:

- He introduced Janet Van Cuyk who is joining OCS as the Assistant Director. Ms. Van Cuyk is an attorney and also has a master's degree in social work. She comes to OCS from DJJ.
- Mr. Reiner reported that CSA requested and has been granted an additional \$85.7M in general funds for CSA for the 2017-2018 biennium. He noted that this amount includes funding for a projected six percent annual growth in CSA expenditures for FY18. As of March 1, expenditures for FY17 are 2.5 to 3 percent ahead of FY16.
- One budget amendment was passed during the General Assembly Session. Item 1#6c directs staff of the legislative money committees to examine the options and determine the actions necessary to better manage the quality and costs of private day educational programs currently funded through the Children's Services Act (CSA).
- Members received a copy of the FY17 Training Status Report and a draft of the FY18 Training Plan. The draft FY18 Training Plan will be presented for adoption at the June SEC meeting.
- The CSA Conference will be held April 19-20 in Roanoke. A special meeting of the SEC will be held on April 19 with the conference speaker, Dr. Allison Jackson, General Manager for Magellan of Virginia.
- The New CSA Coordinator Academy will conclude today. Eighteen new CSA coordinators have been in attendance for the three day training.

SLAT Report

Tamara Temoney, SLAT Chair reported that SLAT continues to focus on development of a SLAT Work Plan based on the goals and strategies from the FY16-FY18 biennial plan endorsed by the SEC and SLAT at their joint retreat in December 2015.

Report from the SEC Finance and Audit Committee

Mary Biggs reported on behalf of the Committee. She reported that the Committee has been drafting proposed policy that will provide direction to the OCS Executive Director in response to audit findings of non-compliance by local CSA programs.

Ms. Biggs presented a Notice of Intent to Develop Policy that the SEC Finance and Audit Committee recommends the SEC approve for a public comment period (March 27, 2017 – May 15, 2017). The SEC approved the recommendation. Public comment will be accepted through the CSA website: www.csa.virginia.gov.

Presentations

SEC member and DJJ Director, Andrew Block, presented on the Juvenile Justice Transformation in Virginia. At the conclusion of the presentation, members asked questions and discussed how CSA might create synthesis with these efforts.

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Members also received a panel presentation on Local CSA Funding Options for IEP-Required Special Education Services and their impact on expenditure trends. The presentation was facilitated by James Gillespie, System of Care Director for Fairfax County. At the conclusion of the presentation, panel members answered questions. Dr. Hazel asked the SEC members to think about how the SEC should move forward in informing the General Assembly discussion on private day education.

Mr. Reiner presented several of the new outcomes reports from the CANVaS 2.0 system. Of particular note were the CANVaS 2.0 Individual Progress Report and the Permanency Report. During discussion, it was noted that perhaps the SEC should invite Dr. John Lyons, developer of the assessment instrument, to present to the SEC at a future meeting.

Member Updates

Dr. Hazel asked members to report on activities within their agencies and organizations. Members reported on the legislative session and upcoming conferences and events. Members continue to work within their agencies, serve on workgroups and advocate through their associations for improvements to services and service delivery for the children, youth and families of Virginia.

Next Meeting and Adjournment

There being no further business the meeting was adjourned at 12:30 p.m. The next meeting is scheduled for April 19, 2017 in Roanoke during the CSA Conference.



TRAINING PLAN

Fiscal Year 2018

Developed in accordance with Chapter 780 (Appropriation Act), Item 285, Section B.6

Approved by the State Executive Council – June 15, 2017

The mission of the Children's Services Act (CSA) is to create a collaborative system of services and funding that is child-centered, family-focused and community-based when addressing the strengths and needs of troubled and at-risk youth and their families in the Commonwealth. One important mechanism for achieving this mission is through development and implementation of a robust training plan. The Code of Virginia requires that the Office of Children's Services (OCS) "provide for training and technical assistance to localities in the provision of efficient and effective services that are responsive to the strengths and needs of troubled and at-risk youths and their families." In accordance with provisions of the Appropriation Act, the Office of Children's Services presents an annual training plan to the State Executive Council for approval. This document outlines the OCS FY2018 Training Plan for the period of July 1, 2017 – June 30, 2018.¹ The list of training topics is intended to be broad and inclusive. Specific training activities will be planned and implemented in response to stakeholder requests and needs, important system-wide initiatives, and within the resources available.

I. GOALS

A. TO INCREASE KNOWLEDGE, SKILLS, AND COMPETENCIES OF INDIVIDUALS HOLDING CSA-SPECIFIC ROLES AND RESPONSIBILITIES TO ENSURE EFFECTIVE IMPLEMENTATION OF THE CSA.

Objectives:

- To enhance effectiveness and positive outcomes for youth and families by ensuring that the core requirements of CSA and the principles of a system of care are known to individuals who serve key roles within the structures of CSA.
- To assure that basic competencies in CSA practice are applied to local operations.
- To enhance the level of knowledge and skills of core members of local CSA team members.
- To support, encourage, and motivate key CSA participants to realize the mission and vision of the CSA and the system of care through collaboration and excellence in practice.

Target Audiences:

- CSA Coordinators; CPMT members; FAPT members; Fiscal Agents; Other local CSA staff (e.g., Utilization Review Specialists)

Possible Topics:

- CSA Mission and Vision/CSA as a System of Care
- Building effective multi-disciplinary teams/collaboration
- Overview and prioritization of local CSA Coordinator responsibilities (§2.2-2649)
- Provision of effective and efficient services (§2.2-2649)

¹ Where appropriate, specific statutory requirements addressed through this training plan are indicated.

- Use of data and data analytics to assess service patterns and improve outcomes
- Understanding High Fidelity Wraparound and Intensive Care Coordination
- Utilization Management and Utilization Review (*Appropriation Act*)
- Controlling costs and utilizing alternative funding streams and revenues (*Appropriation Act*)
 - Blending & Braiding Funds – Developing a Fiscal Plan
 - Accessing the full array of Medicaid services (*Appropriation Act, with DMAS*)
 - DSS Adoption Assistance funds
- Use of state pool funds: eligibility and decision points; use of Special Education Wraparound funds
- FAPT determination of CHINS: parental agreements and foster care prevention
- Understanding mission, purpose, and outcomes of child-serving agencies
 - Foster care services and the CSA (*Appropriation Act, with DSS*)
 - Requirements regarding IDEA and the use of CSA funds for special education services (*Appropriation Act, with DOE*)
- Guidelines for Therapeutic Foster Care and negotiating contracts with TFC providers (*Appropriation Act*)
- Building community services/public-private partnerships (*Appropriation Act*)
- CSA program audits: compliance monitoring and program improvement; self-assessment process
- Navigating cross-jurisdictional issues: Fostering Connections; transfers across jurisdictions; out-of-state placements
- Administrative and fiscal issues: Local statutory responsibilities (*Appropriation Act*)
- Financial and data reporting requirements of CSA (supplemental funding requests; pool fund reimbursements; LEDRS; understanding service categories and match rates)
- Engaging families, empowering client/family voice and choice
- Contracting: regional contracts, negotiating terms, performance-based contracts
- Audits of local CSA programs

Primary implementation methods:

- Annual CSA Conference
- Annual New CSA Coordinator Academy
- On-line courses and Webinar training
- Information disseminated through the CSA website

B. TO INCREASE KNOWLEDGE, SKILLS, AND COMPETENCIES OF CHILD SERVING ENTITIES TO MAXIMIZE USE OF CSA PROCESSES AND FUNDING TO EFFECTIVELY SERVE YOUTH AND FAMILIES.

Objective:

- To ensure that the key partners in the CSA gain specific and targeted knowledge and competencies to incorporate CSA into their primary areas of professional responsibility.

Target Audiences:

- Executive managers, supervisors, and direct service staff in local departments of social services, court service units, community services boards, and school divisions; state level managers in child-serving agencies; juvenile and domestic relations court judges; guardians ad litem; LDSS attorneys; elected and appointed local government officials; private service providers.

Topics:

- Foster care services and the CSA (*Appropriation Act, with DSS*)
- Requirements regarding IDEA and the use of CSA funds for special education services (*Appropriation Act, with DOE*)
- Vision and mission of CSA
- Accessing CSA funded services
- CANS certification and Super Users training
- Using CANS for service planning

Primary Implementation Methods:

- Stakeholder venues/conferences
- Locality-specific training events
- Virtual learning (on-line) opportunities developed and disseminated in conjunction with partner agencies

Supporting Activities:

- Coordinate with local CSA programs and stakeholder organizations to plan and deliver topical CSA training within agency-specific conferences and training sessions.
- Work with the State and Local Advisory Team (SLAT), the State Executive Council (SEC), partner agencies, and other affiliated organizations (e.g., VML/VACO, VCOPPA, VLSSE) to identify CSA-related training to be incorporated into agency training requirements and plans.

C. TO ENHANCE CSA OUTCOMES FOR YOUTH, FAMILIES AND COMMUNITIES BY ADOPTION OF EFFECTIVE, EVIDENCE-BASED AND EVIDENCE-INFORMED PRACTICES.

Objectives:

- To provide opportunities for CSA stakeholders to learn about and develop competencies in effective, evidence-based models pertaining to the service needs of the CSA population.

Target Audiences:

- All CSA stakeholders

Topics:

- Best practices and evidence-based practices related to the CSA (*Appropriation Act*)
 - Introduction to Systems of Care
 - Intensive Care Coordination / High Fidelity Wraparound (HFW) Facilitator, Supervisor and Family Support Partner training
 - Trauma-informed services within an overall System of Care (in collaboration with DSS and DBHDS)
 - Use of the CANS as an outcomes management tool
 - Family engagement – families and youth as partners
 - Evidence-based/evidence-informed practices in children's services

Primary implementation methods:

- Annual CSA Conference
- Collaborative training efforts with partner agencies
- On-line and Webinar training
- Information developed and disseminated through the CSA website

II. TRAINING AND TECHNICAL ASSISTANCE METHODOLOGIES

A. DELIVER OCS SPONSORED TRAINING OPPORTUNITIES

Activities:

- Conduct Annual CSA Conference
- Conduct Pre-conference CSA Coordinator session at CSA Conference
- Conduct New CSA Coordinator Academy
- Regional training events on selected topics

B. DELIVER CSA RELATED TRAINING WITHIN STAKEHOLDER VENUES/CONFERENCES

Projected Activities:

- In collaboration with sponsoring entities, conduct training in a variety of venues. Examples include, but are not limited to:
 - Department of Education: Aspiring Leaders of Special Education Academy
 - Department of Education: New Directors of Special Education Academy
 - Virginia League of Social Service Executives training events
 - Virginia Association of Counties/Virginia Municipal League meetings
 - Virginia Association of School Boards
 - Virginia Association of School Superintendents
 - Virginia Coalition of Private Provider Organizations Critical Issues Symposium
 - Virginia Association of Independent Special Education Facilities: Annual Conference
 - Office of Executive Secretary of the Supreme Court: Court Improvement Program training events
 - Office of Executive Secretary of the Supreme Court: Mandatory J&DR Judges Conference
- Through collaboration with stakeholder agencies and organizations, identify and schedule venues.
- Through collaboration with stakeholder agencies and organizations and the State and Local Advisory Team (SLAT), identify training needs and appropriate training venues/opportunities.

C. DELIVER TARGETED, HIGH-QUALITY TECHNICAL ASSISTANCE

Objective:

- To respond to stakeholder identified needs for information that will enhance the effectiveness of CSA activities, minimize and/or respond to audit findings, and support overall system of care implementation

Activities:

- Maintain the "OCS Help Desk" on the CSA website to facilitate prompt, accurate and consistent responses to requests for specific guidance on policy and practice
- Provide targeted on-site training and technical assistance to meet needs identified by OCS, localities, and/or regions

- Provide targeted assistance to facilitate CPMT corrective action/program improvement activities
- Provide on-site and remote technical assistance on frequently asked questions/common issues
- Provide information through the Resource Library of the CSA website (FAQ's, Fact Sheets)

D. DEVELOP AND OFFER VIRTUAL LEARNING OPPORTUNITIES

Objective:

- Maximize participation and accessibility of CSA-related training through an array of venues and delivery platforms and designing training to meet diverse learning styles

Activities:

- Maintain statewide training site for CANS certification
- Administer the CSA Knowledge Center (KC) to include user account management for local, non-state agency users
- Plan and deliver webinars on "hot topics" (e.g., new policy guidelines, new fiscal reporting systems), best practices, common focal issues raised by CSA stakeholders)
- Develop and implement on-line and other distance learning programs to include:
 - Educational opportunities through the Knowledge Center
 - OCS-sponsored webinars
 - Ongoing availability of archived training materials from the annual conferences, webinars, and other sources
 - Use of the CSA website to make available materials from national and other sources of best-practices information

E. PROMOTE AVAILABILITY OF LIVE AND VIRTUAL TRAINING OPPORTUNITIES

Objective:

- Build participation levels and ensure that various stakeholders are aware of relevant training opportunities provided by both OCS and partner agencies

Activities:

- Maintain the on-line Training Calendar which provides information about upcoming training events and information on how to enroll in those events
- Support the work of the SLAT to collect, provide to OCS and disseminate information on upcoming training events
- OCS will utilize various communication mechanisms (CSA listserve, CSA website, e-mail lists) to inform stakeholders of relevant upcoming training events

III. EVALUATION

Objective:

- To provide accountability and continuous quality improvement for OCS training activities

Activities:

- Identify and assess measurable objectives for CSA training activities
- Design course outlines, content, materials, methods of instruction, and evaluation criteria for CSA training activities that reflect the principles of adult learning and best practices in instructional design
- Collect and report information regarding participants (e.g., number, primary professional affiliation) at major CSA training events
- Collect and summarize evaluations of OCS training activities and utilize feedback to refine and improve training activities
- Provide quarterly reports to the State Executive Council summarizing OCS training activities
- Complete and submit an annual report to the General Assembly regarding OCS training activities

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CSA POOL REIMBURSEMENT REQUEST REPORT COMPARISON (FY14 -FY17)

Today's Date: June 06, 2017

Net Total Expenditures as of June 06, 2017 of each Fiscal Year.

Net Total Expenditures include all reports with a status of 1 or greater (All non-pended reports)

EXPENDITURE DESCRIPTION	NET TOTAL EXPENDS FY14	NET TOTAL EXPENDS FY15	NET TOTAL EXPENDS FY16	NET TOTAL EXPENDS FY17	\$ CHG	% CHG
NUMBER OF REPORTS	1,249	1,245	1,244	1,307	63	
1. MANDATED SERVICES / RESIDENTIAL / CONGREGATE CARE						
1a. Foster Care - IV-E children in Licensed Residential Congregate Care ; pool expenditures for costs not covered by IV-E (i.e., non room-and-board)	2,290,596	2,557,840	2,182,358	2,139,254	-43,104	-2.0%
1b. Foster Care - all others in Licensed Residential Congregate Care	14,193,644	15,037,816	13,389,270	11,611,960	-1,777,310	-13.3%
1c. Residential Congregate Care – CSA Parental Agreements ; DSS Noncustodial Agreements	7,173,355	7,128,751	7,854,660	8,525,127	670,466	8.5%
1d. Non-Mandated Services/Residential/Congregate	618,351	975,000	787,954	914,338	126,384	16.0%
1e. Educational Services - Congregate Care	26,895,964	28,302,796	29,652,696	31,805,097	2,152,401	7.3%
- School Referred Residential - Non-Educational Services	0	0	0	0	0	0 %
2. OTHER MANDATED SERVICES						
2a. Therapeutic (Treatment) Foster Care – IV-E	18,860,241	20,924,434	22,496,113	25,865,708	3,369,595	15.0%
2a.1 Therapeutic (Treatment) Foster Care	35,893,853	33,893,471	30,021,840	27,930,030	-2,091,810	-7.0%
2a.2 Therapeutic (Treatment) Foster Care – CSA Parental Agreements ; DSS Noncustodial Agreements	551,478	318,403	359,995	445,422	85,427	23.7%
2b. Specialized Foster Care – IV-E ; Community Based Services	1,196,956	1,375,357	779,593	-5,376	-784,969	-100.7%
2b.1 Specialized Foster Care	3,178,129	3,264,778	2,540,339	-46,008	-2,586,347	-101.8%
2c. Family Foster Care – IV-E ; Community Based Services	720,867	936,706	1,435,496	1,545,364	109,868	7.7%

Pool Totals Comparison by Category - Statewide

2d.	Family Foster Care Maintenance only	2,653,669	3,214,417	1,916,887	-5,002	-1,921,889	-100.3%
2e.	Family Foster Care – Children receiving maintenance and basic activities payments; independent living Stipend/Arrangements	8,113,476	7,043,767	10,961,883	14,473,657	3,511,775	32.0%
2f.	Community - Based Services	21,114,888	23,195,330	24,833,818	28,594,615	3,760,797	15.1%
2f.1	Community Transition Services – Direct Family Services to Transition from Residential to Community	1,406,350	1,239,581	1,337,297	704,717	-632,580	-47.3%
2g.	Alternative Day Placement/ SPED Private Day	78,395,645	87,197,601	95,358,666	107,440,597	12,081,931	12.7%
2h.	Wrap Services for Students with Disabilities	1,116,555	1,261,760	1,258,537	1,635,090	376,554	29.9%
2i.	Psychiatric Hospitals/Crisis Stabilization Units	4,140	222,300	196,115	160,731	-35,384	-18.0%
3.	Non-Mandated Services/Community-Based	2,513,662	3,034,674	2,774,025	2,969,333	195,308	7.0%
	GRAND TOTALS:	226,891,818	241,124,781	250,137,541	266,704,655	16,567,114	6.6%

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COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

MEMORANDUM

TO: State Executive Council for Children's Services

FROM: Janet Van Cuyk, Assistant Director
Office of Children's Services

RE: SEC Policy 4.7 (Response to Audit Findings) – Request for Proposed Stage

DATE: June 15, 2017

I. Action Requested

The State Executive Council for Children's Services (SEC) is requested to approve the proposed SEC Policy 4.7, Response to Audit Findings with Regard to Children Services Act, for advancement to the Proposed Stage of policy making pursuant to SEC Policy 2.4, Public Participation in Policy-making Actions.

If advanced, during the Proposed Stage, the proposed policy will be (i) open for a public comment period of not less than 60 days, (ii) analyzed for its fiscal impact, and (iii) reviewed by the Office of the Attorney General to ensure statutory authority for the proposed policy-making action.

II. Background

SEC Policy 4.6, Denial of Funds, sets forth the procedures to follow for investigating or determining noncompliance with applicable statutes, regulations, or policies applicable to the Children's Services Act (CSA).

Section 2.2-2648 of the *Code of Virginia* authorizes the SEC to establish interagency programmatic and fiscal policies, provide for dispute resolution procedures for administrative actions, provide for the administration of necessary functions that support the work of the Office on Children's Services (OCS), establish and oversee the operation of an informal review and negotiation process with the OCS Executive Director and a formal dispute resolution procedure before the SEC when the Executive Director or SEC finds that a community policy and management team (CPMT) failed to comply with any

provision of and deny state funding to a locality where a CPMT fails to comply with CSA or other applicable statutes or policies.

OCS employees conduct audits of local CSA programs, procedures, and practices through interview, observation, and the review of documentation to determine compliance, in whole or in part, with the requirements of a state or federal statute, including the applicable Appropriations Act provisions, regulation, or policy, whether it is specific to the CSA or are those promulgated by the participating agencies, that govern the operations of local CSA programs.

The report completed by the OCS auditors is reviewed by the OCS Executive Director where a determination is made, if applicable, as to the type of noncompliance and whether the locality will be required to reimburse the expended state pool funds. The categories and actions outlined in proposed SEC Policy 4.7, Response to Audit Findings with Regard to Children Services Act, are consistent with current OCS practices.

The SEC’s Finance and Audit Committee met to discuss the substance of this policy. The committee advanced the concept and the level designations for consideration by the SEC.

III. Public Comment

A public comment period at the Notice Stage was open from March 27, 2017, through May 31, 2017. Below is a summary of the public comments received.

#	Commenter	Summary of Comment
1	Greg Winge CSA Program Director Franklin County	<ul style="list-style-type: none"> • The posting does not go into any detail about what specific findings in an audit will result in the recovery of state pool funds. Will a minor infraction result in the recovery of state funds?
2	Jessica Webb CSA Coordinator Cheryl Austin CMPT Chair Roanoke County	<ul style="list-style-type: none"> • The CPMT appreciates the efforts to standardize and objectify the OCS responses to audit findings. • The three audit finding categories appear to be appropriately linked to specific findings. It would be helpful to document the regulatory requirement for each type of finding across all three categories. It appears that, in category three, there are some findings that are linked to best practices rather than a statutory or SEC policy requirement. <ul style="list-style-type: none"> ○ Anything not linked to a regulatory requirement should be removed from the findings list. • The policy appears to be an extension of the current SEC Denial of Funds policy. <ul style="list-style-type: none"> ○ This policy should be considered an addendum to or revision to the current SEC Denial of Funds policy rather than as a standalone policy.
3	Rodney E. Gordon Director Essex County DSS Essex County CPMT	<ul style="list-style-type: none"> • The CPMT opposes the proposed policy as presented at the notice stage. • The CPMT would like to have the opportunity to review the entire policy. An appeal process should be added. • The proposed policy is unclear as to the degree of noncompliance that

		<p>would be subject to a sanction. A corrective action process should be established with clear guidance and direction from OCS to offer remedial help and coaching in order to assist the locality when there are chronic noncompliance issues resulting in exposure to fiscal risk.</p> <ul style="list-style-type: none"> • OCS should strengthen the continuity of their best practice guidance. At times, localities have received conflicting guidance on CSA policy interpretation which may have resulted in noncompliance findings.
4	Lesley Abashian Loudoun County	<ul style="list-style-type: none"> • The proposed levels are not presented as graduated sanctions and that there isn't a level of audit findings that is "corrective action plan without recovery of funds (without further action)." The levels should reflect that there are times an audit finding doesn't represent a failure in the system or pattern of failure to follow policy that warrants sanctions. • Is the purpose of the OCS Audit to recover funds or to ensure localities are following state CSA Code, assuming accountability for oversight of CSA funds and improving their local systems as necessary (continuous quality improvement processes).
5	Saniyyah Manigault CSA Coordinator Norfolk City	<ul style="list-style-type: none"> • There is no graduated sanction process. It would be favorable to offer a less punitive intervention initially (e.g., corrective action plan) rather than recovery of funds. • The proposed policy is vague and does not define the types of infractions that would lead to the recovery of funds. • Limited technical support is offered on a consistent basis to localities to ensure compliance with CSA policy. Despite this fact, major penalties are being suggested.
6	Kimberly Irvine Director York County – City of Poquoson DSS	<ul style="list-style-type: none"> • There are currently no written guidelines in place regarding the denial of funds and the development of corrective action plans. • The notice references SEC Policy 3.4, Dispute Resolution Process. The safeguards in the appeal/due process are not sufficient in protecting localities from unreasonable fiscal hardship. It also does not address cause and corrective action. • OCS should adopt a policy similar to the denial of Title IV-E funds policy developed by the Virginia Department of Social Services (VDSS) which was extensively reviewed and supported by the Secretary of Health and Human Services, VDSS, the Virginia League of Social Services (VLSSE). This policy has provisions relating to (i) an ongoing review process, (ii) corrective action plans, and (iii) training. • The VDSS policy has a "period under review" which is defined as the time period since the last VDSS Title IV-E review and is used as the period for determining the repayment of funds. The OCS audits on a three-year cycle (each locality is audited every three years) with a one fiscal year as the period under review. This timeline is of concern because agencies may have errors that will not receive any technical and/or sufficient audit reviews by OCS to assist in limiting potential financial paybacks for up to three fiscal years prior to an OCS program review. <ul style="list-style-type: none"> ○ OCS should mimic the VDSS Title IV-E policy and audit reviews with at a minimum quarterly/annual basis versus a three-year plan. • The VDSS policy requires a locality to provide full repayment only after a subsequent review process results in failure to obtain an acceptable

		<p>error rate as described in the shared fiscal responsibility matrix which has graduated fiscal sanctions over time if the locality continuously fails to meet with 5% payment error and 5% case error threshold. Each level has progressively more stringent requirements, from a minimum of zero payment to the maximum full federal reimbursement. The policy limits the period of time that a locality would be responsible to pay back fund to the period under review.</p> <ul style="list-style-type: none"> ○ OCS should, prior to denying funds, provide a locality with technical support and audit reviews, including corrective action plans similar to that defined in the Title IV-E policy for denial of funds. ● The VDSS Title IV-E denial of funds policy was extensively reviewed and agreed upon by state and local partners and meets the requirements of state oversight and local responsibility for CSA. <ul style="list-style-type: none"> ○ OCS should use the VDSS Title IV-E policy as a guide for the OCS denial of funds policy. ● CSA policy is complex and local governments struggle with its roles and responsibilities in relationship to other state agencies. <ul style="list-style-type: none"> ○ OCS should increase its training opportunities for localities specific to the correlation between funding and programming.
7	<p>Diane Kuknyo Chair Charlottesville CPMT Phyllis Savides Chair Albemarle County CPMT</p>	<p>Comments submitted by Albemarle County and Charlottesville CPMT were identical to comment #6.</p>
8	<p>Catherine Pemberton President Virginia League of Social Services Executives</p>	<p>Comments submitted by the Virginia League of Social Services Officials were identical to comment #6.</p>
9	<p>Kimberly Irvine Legislative Chair Virginia Association of Local Human Services Officials</p>	<p>Comments submitted by the Virginia Association of Local Human Services Officials were identical to comment #6. Additionally, the “Title IV-E Foster Care Shared Fiscal Accountability Matrix Review Processes Corrective Action Plans,” effective July 1, 2015 was also attached to the comments.</p>
10	<p>Ann Porter CSA Coordinator King William County</p>	<ul style="list-style-type: none"> ● The CPMT endorses the public comments outlined in Comment #6. ● The proposed levels of audit findings do not represent a progression of consequences. There is a concern that all levels in the proposed policy require recovery or suspension of state funds. There is no option of findings resulting in a corrective action plan without suspension or recovery of funds. ● “Repeat findings” is not defined. ● Elements that would result in recovery in state funds are not defined. ● The proposed policy does not take into account the high turnover rate in local CSA personnel statewide without ongoing training in CSA policy that is likely to result in human error that may be a significant contributing factor to negative audit results.

11	Linda Gray CSA Coordinator Page County	Please see audit response letter submitted by CPMT dated March 1, 2017.
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IV. OCS Response to Public Comment

Comment # 1: Thank you very much for submitting Franklin County’s comments on the Notice Stage of SEC Policy 4.7. OCS is optimistic that the detail provided in the Proposed Stage, which will be open for a minimum 60-day public comment period, will provide sufficient detail to address your comments. The proposed policy details three levels of audit finding that will result in three separate types of sanctions (*see* §§ 4.7.4 and 4.7.6 of the proposed policy).

Comment # 2: Thank you very much for submitting Roanoke County’s comments on the Notice Stage of SEC Policy 4.7. Your suggestion to cross reference authority for the different types of noncompliance findings is very much appreciated. OCS will complete a crosswalk to be available as a guidance document to accompany the policy, if approved. As to whether this policy should be included in the SEC Denial of Funds policy, when the SEC conducts its intended comprehensive review of all policies, OCS will explore this suggestion as a revision option.

Comment # 3: Thank you very much for submitting Essex County’s comments on the Notice Stage of SEC Policy 4.7. OCS is optimistic that the detail provided in the Proposed Stage, which will be open for a minimum 60-day public comment period, will provide sufficient detail to address your concern over not having the ability at the Notice Stage to review the entire proposed policy. Regarding your suggestion for the inclusion of an appeals process, a cross reference to the SEC Policy 3.4 (Dispute Resolution Process) has been added to serve as the appeals process.

Regarding on-going technical assistance, OCS is committed to having the highest level of customer service. OCS continues to increase the availability of in-person and web-based training opportunities. Additionally, staff at OCS provides technical assistance daily through the “OCS Helpdesk” function available on the CSA website. Additional detail on OCS technical assistance is detailed in the response to Comments 6-10 below.

Comment # 4: Thank you very much for submitting Loudoun County’s comments on the Notice Stage of SEC Policy 4.7. OCS is optimistic that the detail provided in the Proposed Stage, which will be open for a minimum 60-day public comment period, will provide sufficient detail to address your comments. The proposed policy details three levels of audit finding that will result in three separate types of sanctions (*see* §§ 4.7.4 and 4.7.6 of the proposed policy).

Regarding your question on the purpose of the OCS Audit, that is detailed in the Program Audit Charter, available on the CSA website, effective July 2015. The Charter states:

Internal Auditing is an independent and objective assurance and consulting activity that is guided by a philosophy of adding value to improve the operations of CSA via oversight by OCS. It assists OCS in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the CSA program's governance, risk management, and internal control.

Comment # 5: Thank you very much for submitting Norfolk's comments on the Notice Stage of SEC Policy 4.7. OCS is optimistic that the detail provided in the Proposed Stage, which will be open for a minimum 60-day public comment period, will provide sufficient detail to address your concerns. The proposed policy details three levels of audit finding that will result in three separate types of sanctions (see §§ 4.7.4 and 4.7.6 of the proposed policy).

Regarding on-going technical assistance, OCS is committed to having the highest level of customer service. OCS continues to increase the availability of in-person and web-based training opportunities. Additionally, staff at OCS provides technical assistance daily through the "OCS Helpdesk" function available on the CSA website. Additional detail on OCS technical assistance is detailed in the response to Comments 6-10 below.

Comments # 6 -10: Thank you to you all for your comments on the Notice Stage of SEC Policy 4.7. OCS is optimistic that the detail provided in the Proposed Stage, which will be open for a minimum 60-day public comment period, will provide sufficient detail to address many of your concerns.

Adopt a Policy Similar to VDSS's Title IV-E:

- The comments recommend that the proposed policy adopt a policy similar to the VDSS Title IV-E review and response to noncompliance findings processes.
- VDSS's auditing and response to audit findings are provided for in federal law (42 U.S.C. 670 *et seq.* and 45 CFR 1355 and 1356) which gives states flexibility in auditing and responding to findings of noncompliance. The *Code of Virginia* does not incorporate similar flexibility relating to findings of noncompliance in CSA. The *Code* specifically states that OCS "shall" deny funds when noncompliances are found.
- VDSS administers two types of Title IV-E reviews for local departments of social services (LDSSs): (i) new case validations¹ and (ii) ongoing reviews.² According to VDSS personnel, in these reviews, if an individual is erroneously found to be Title IV-E eligible, this is considered a "fatal error" requiring reimbursement of all funds

¹ New case validations are designed to review and ensure appropriate eligibility determinates are made within approximately 90 days of children entering foster care.

² The ongoing reviews are designed to provide continuous quality control and support to LDSS by reviewing all open Title IV-E cases, at least once each fiscal year.

regardless of whether the noncompliance was a first or subsequent violation. Thereafter, VDSS has implemented graduated sanctions and the shared fiscal accountability matrix when an eligible individual receives ineligible services. Accordingly, it appears that VDSS's Title IV-E review process incorporates tiers similar to those recommended in the proposed policy, reserving the requirement to reimburse funds for the most serious level of noncompliance (e.g., a violation of statutory requirements).

Ongoing Review Process:

- The comments recommend OCS should conduct reviews on a minimum of quarterly/annual basis rather than pursuant to the three-year plan, similar to the VDSS Title IV-E review process.
- OCS is committed to the highest level of customer service; however, limited resources in the OCS Audit Unit limit the ability to increase the frequency of local CSA program reviews.³

Corrective Action Plans:

- The comments recommend adopting the VDSS Title IV-E corrective action plans for responding to findings of noncompliance.
- For “non-fatal errors,” VDSS samples 100% of the cases and the percentage for shared fiscal accountability is calculated from the entire sample. OCS samples up to ten percent of the cases in the period under review. Adopting a similar acceptable tolerance for the OCS sample would require a larger OCS sample and additional resources.
- Proposed Noncompliance Level Two and Three Findings are analogous to the non-fatal errors in the VDSS reviews and incorporate the option for submitting a corrective action plan prior to any request for reimbursement of state pool funds. For findings in these two categories, no funds are subject to reimbursement until a repeat finding of noncompliance after a corrective action plan has been requested and implemented.

Training:

- The comments recommend additional training and technical assistance for localities.
- The following trainings, guidance, and technical assistance are currently available:
 - Staff at OCS provides technical assistance daily through the “OCS Helpdesk” function available on the CSA website;
 - Training modules are continuously available on the Commonwealth's Knowledge Center (with a link to the Knowledge Center on the CSA website);
 - OCS has created an detailed Audit Self-Assessment Workbook and publishes all audit findings (available on the CSA website);

³ OCS has a total of four auditors, which includes the Audit Unit Manager. VDSS has ten auditors specifically assigned to review Title IV-E (see Appropriations Act) with approximately ten other auditors contributing resources.

- OCS has created a SEC Policy Manual and CSA User Guide (available on the CSA website); and
- OCS annually conducts a three-day, New CSA Coordinator Conference.
- OCS continues to increase the availability of in-person and web-based training opportunities.

V. Conclusion

The proposed SEC Policy 4.7 is intended to provide clarity to localities on OCS's response to audit findings of noncompliance and guidance for the OCS Executive Director for objective, consistent responses to such findings. The proposed draft is consistent with the current practice of OCS and the tiered levels separate out the variance in severity of noncompliance types.

The SEC is requested to approve the proposed SEC Policy 4.7, Response to Audit Findings with Regard to Children Services Act, for advancement to the Proposed Stage of policy making pursuant to SEC Policy 2.4, Public Participation in Policy-making Actions.

SEC POLICY 4.7

RESPONSE TO AUDIT FINDINGS WITH REGARD TO THE CHILDREN'S SERVICES ACT

4.7.1 PURPOSE

To provide guidance to the Office of Children's Services (OCS) and improve transparency for localities when the OCS Executive Director is carrying out his or her duties under the State Executive Council for Children's Services (SEC) Policy 4.6 (Denial of Funds) in responding to OCS audit noncompliance findings by local Children's Services Act (CSA) programs.

4.7.2 AUTHORITY

Section 2.2-2648 of the *Code of Virginia* authorizes the SEC, paraphrased in relevant part, to do the following:

- (i) Establish interagency programmatic and fiscal policies which support the purposes of CSA (subdivision D (3));
- (ii) Provide for dispute resolution procedures for administrative actions that support the purposes of the CSA (subdivision D (4));
- (iii) Provide for the administration of necessary functions that support the work of the OCS (subdivision D (6));
- (iv) Establish and oversee the operation of an informal review and negotiation process with the OCS Executive Director and a formal dispute resolution procedure before the SEC, to include formal notice and an appeals process, should the Executive Director or SEC find, upon a formal written finding, that a community policy and management team (CPMT) failed to comply with any provision of CSA (subdivision D (19)); and
- (v) Deny state funding to a locality, in accordance with (iv) in this section, where the CPMT fails to provide services that comply with CSA and other applicable statutes or policies (subdivision D (20)).

4.7.3 DEFINITIONS

"*Audit*" means a review by OCS employees of a local CSA program's policies, procedures, and practices through interview, observation, and the review of documentation to determine compliance, in whole or in part, with the requirements of a state or federal statute, including the applicable Appropriations Act provisions, regulation, or policy, whether it is specific to the CSA or are those promulgated by the participating agencies, that governs the operations of local CSA programs.

"*Noncompliance Finding*" means the local CSA program has not met the requirements, in whole or in part, of a state or federal statute, including the applicable Appropriations Act provisions, regulation, or policy, whether it is specific to the CSA or are those promulgated by the participating agencies that governs the operations of local CSA programs. There are three levels of noncompliance findings outlined in this SEC policy.

4.7.4 NONCOMPLIANCE FINDING LEVELS

The subsection delineates three levels of noncompliance findings as defined above. The parameters and examples provided in each level are not exhaustive but shall guide OCS in determining into which level any noncompliance finding is categorized based on the noncompliance finding's similarity to the general parameters and specific examples provided below.

4.7.4.1 Noncompliance Level Three Finding

- A. *General Parameters:* Audit findings in this category are case specific and occur when CSA state pool funds have been reimbursed when the expenditure is not authorized by statute, regulation, or policy.
- B. *Examples of Specific Noncompliance Level Three Findings:*
1. The child and/or family are ineligible for CSA funding per §§ 2.2-5211 and 2.2-5212 of the *Code of Virginia* or documentation of eligibility (e.g., an Individualized Education Program [IEP] or a Child in Need of Services [CHINS] eligibility determination) was not available for review during the audit;
 2. The CSA funding was reimbursed for services required to be paid through an alternative funding source (e.g., failure to utilize Title IV-E or Medicaid funds in eligible cases);
 3. Medicaid funding was not sought and/or denial of Medicaid funding was not documented despite the service being reimbursable by Medicaid and the child is covered under Medicaid;
 4. Services were not recommended by a Family Assessment or Planning Team (FAPT) or Multidisciplinary Team (MDT) and/or an Individual and Family Service Plan (IFSP) was not developed, except where a local CPMT policy allows such expenditures to be exempt from FAPT or IFSP requirements (e.g., "maintenance only" foster care or IEP-mandated placements);
 5. The funding was not approved by the CPMT;
 6. Utilization of the state pool funds violated participating agency statutes, regulations, or policies, such as:
 - a. Payment for Enhanced Foster Care Maintenance when the Virginia Department of Social Services' (VDSS) Virginia Enhanced Maintenance Assessment Tool (VEMAT) policy was not followed;
 - b. Title IV-E funding was denied due to error; or
 - c. The local DSS used an unapproved/unlicensed foster home placement.
 7. Services were within the scope of responsibility of another agency (e.g., services to students with disabilities provided in the public school setting; administrative costs of a local DSS such as paternity testing, drug screening, or legal services

- related to prosecuting child abuse and neglect; case management by a local DSS for youth committed to the Department of Juvenile Justice (DJJ));
8. The service provider did not meet licensing requirements for the specific service (e.g., behavioral health providers or providers [LCPA, day care] requiring licensure by VDSS);
 9. The use of a non-Medicaid provider, when the child and/or family were Medicaid eligible, and there is no substantiation that a Medicaid provider was unavailable or inappropriate;
 10. Failure to refund to CSA recoveries made against previously claimed costs (e.g., child support collections, Title IV-E recoveries, or retroactive Medicaid payments for services);
 11. Failure to correct erroneous expenditure reports that require adjustments to CSA match rate categories; and
 12. Expenditures claimed after September 30 which were incurred in the previous fiscal year.

4.7.4.2 Noncompliance Level Two Finding

A. *General Parameters:* Findings in this category are case specific and involve a violation of an applicable statute, regulation, or policy but, had the requirements been followed, would have been eligible for reimbursement through state pool funds. Findings may be mitigated by corrective action already implemented on a case-specific basis (e.g., FAPT or CPMT action was not timely made but was taken in a reasonable time thereafter).

B. *Examples of Specific Noncompliance Level Two Findings:*

1. Assessments with the mandatory uniform assessment instrument (i.e., CANS) are not completed in accordance with established requirements (e.g., initial, annual, or discharge assessments);
2. FAPT did not adopt recommendations and/or an IFSP was not developed in a timely manner (e.g., an LDSS emergency placement was not heard by FAPT within 14 days of placement, but the requirements were completed within a reasonable [e.g., 30 day] time period), except where CPMT policy allows an exemption to the requirement;
3. CPMT did not approve services and expenditures in a timely manner but did so within a reasonable (e.g., 30 day) time period;
4. There was missing or inadequate documentation (e.g., utilization review, missing elements of an IFSP, parental contribution assessments, provider progress notes, CHINS eligibility determinations, parental participation in service planning, VEMAT documentation, or parental agreements) during the audit but enough

information was available to determine the service was eligible for state pool fund reimbursement; and

5. There was missing, incomplete, or inaccurate financial documentation (e.g., purchase orders, invoices, or vendor contracts) but enough documentation to determine that the service was eligible for state pool fund reimbursement.

4.7.4.3 Noncompliance Level One Finding

A. *General Parameters:* Audit findings in this category are **not** child specific but represent failure to meet statutory, regulatory, or policy requirements.

B. *Examples of Specific Noncompliance Level One Findings:*

1. CPMT policies are incomplete, obsolete, or do not align with applicable statutes, regulations, or policies;
2. Lack of evidence of long-range community planning and utilization management activities;
3. FAPT and CPMT membership does not meet statutory requirements, and meaningful efforts to correct this noncompliance are not provided;
4. Required Statement of Economic Interest submissions of designated FAPT and CPMT members are not completed in compliance with statutory requirements;
5. There are inadequate fiscal controls (e.g., separation of purchasing and payment authority);
6. There are inadequate CSA-related information technology security controls (e.g., users sharing accounts or passwords); and
7. The locality failed to properly reconcile CSA reimbursement requests with other fiscal systems.

4.7.5 REVIEW OF FINDINGS BY OCS

The OCS Executive Director shall review (i) the audit report; (ii) any response, including corrective actions and quality improvement plans from the locality, (iii) the recommendation of the auditor(s); and (iv) any OCS internal staff review prior to responding to the noncompliance finding.

4.7.6 RESPONSES TO NONCOMPLIANCE FINDINGS

4.7.6.1 Response to Level Three Findings

The OCS Executive Director shall (i) require a corrective action plan and (ii) recover the noncompliant state pool fund reimbursements upon the first and any second or subsequent Noncompliance Level Three Finding.

4.7.6.2 Response to Level Two Findings

- A. *First Level Two Noncompliance Finding:* The OCS Executive Director shall require the locality to submit a corrective action plan on the first instance of Noncompliance Level Two Finding.
- B. *Second or Subsequent Level Two Finding:* The OCS Executive Director shall (i) require a corrective action plan and (ii) recover the state pool funds on any second or subsequent Level Two Noncompliance Finding. 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.

4.7.6.3 Response to Level One Findings

- A. *First Noncompliance Level One Finding:* The OCS Executive Director shall require the locality to submit a corrective action plan on the first instance of Noncompliance Level One Finding.
- B. *Repeat Noncompliance Level One Finding:* The OCS Executive Director shall suspend state pool fund reimbursements on any second or subsequent instance of a Noncompliance Level One Finding until the corrective action plan is implemented. 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.
- C. *Corrective Action Plan Compliance:* Once a local CSA program is in compliance with all applicable requirements of a Noncompliance Level One Finding resulting in suspension of state pool fund reimbursements, all funds will be retroactively released and new requests for reimbursement will be approved.

4.7.6 APPEAL OF OCS RESPONSE

An appeal of the action taken by the Executive Director of OCS shall be pursued by the CPMT in accordance with SEC Policy 3.4 (Dispute Resolution Process).

4.7.7 POLICY REVIEW

This policy will be subject to annual review by the SEC Finance and Audit Committee to determine whether there are necessary modifications that should be recommended to the findings in each Noncompliance Finding Level.

State Executive Council for Children's Services

Policy 4.7

Notice Stage Public Comments

Greg Winge greg.winge@franklincountyva.gov Rocky Mount (540)-483-7209 Ex 1 Franklin County
CSA Program Director

The posting does not go into any detail about what specific findings in an audit will result in the recovery of state pool funds. Will a minor infraction result in the recovery of state funds?

Lesley Abashian Lesley.Abashian@loudoun.gov Leesburg 703 737-8380 Loudoun County

It is concerning that the proposed levels of audit findings are not presented as graduated sanctions and that there isn't a level of audit findings that is "corrective action plan without recovery of funds (without further action)" The levels should reflect that there are times an audit finding doesn't represent a failure in the system or pattern of failure to follow policy that warrants sanctions. What is the level of audit finding that would require a review for possible recovery of funds?

What is the purpose of the OCS Audit? It is to recover funds or to ensure localities are following state CSA code, assuming accountability for oversight of CSA funds and improving their local systems as necessary (continuous quality improvement processes)

Jessica Webb jwebb@roanokecountyva.gov Roanoke 540-283-8805 CSA Coordinator
letter from Roanoke County CPMT submitted to the Office of Children's Services on 5/30/17

Saniyyah Manigault saniyyah.manigault@norfolk.gov Norfolk 757-664-7721 Norfolk CSA
Coordinator

It is concerning that there is no graduated sanction process associated with the proposed response to audit findings. Considering the often ambiguous nature of CSA policy left to local interpretation, it would be favorable to offer a less punitive intervention initially, such as the opportunity to complete a corrective action plan, prior to imposing the recovery of funds.

The proposed policy is vague and does not define the types of infractions that would lead to the recovery of funds.

It appears that any infraction, no matter how great or small would lead to localities having to return funds. Limited technical support is offered on a consistent basis to localities to ensure compliance with CSA policy. Despite this fact, major penalties are being suggested

Linda Gray lgray@pagecounty.virginia.gov Luray 540-743-1003 CSA Coordinator

Please see audit response letter submitted by CPMT dated March 1, 2017.



County of Roanoke



DEPARTMENT OF SOCIAL SERVICES OFFICE OF COMPREHENSIVE SERVICES

May 30, 2017

Scott Reiner, Executive Director
Office of Children's Services
1604 Santa Rosa Road
Richmond, VA 23229

Mr. Reiner:

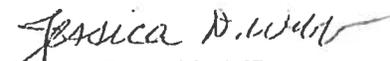
The Roanoke County Community Policy and Management Team (CPMT) has reviewed the Notice of Intent to Develop Policy regarding Responses to Audit Findings with Regard to Children's Services Act (CSA) State Pool Funds. The CPMT appreciates the efforts to standardize and objectify the Office of Children's Services (OCS) responses to audit findings to ensure an equitable approach to corrective actions and quality improvements. The CPMT also has some recommendations that would be beneficial to consider in moving forward with the proposed policy.

The CPMT reviewed the SEC Finance and Audit Committee report from February 16, 2017, which included a discussion draft of the policy that is being considered for proposal. The three audit finding categories appear to be appropriately linked to specific findings; however, it would be helpful to document the regulatory requirement for each type of finding across all three categories. It appears that in category three, there are some findings that are linked to best practices rather than a statutory or SEC policy requirement, and it is recommended that anything not linked to a regulatory requirement be removed from the findings list.

This policy appears to be an extension of the current SEC Denial of Funds Policy. As such, we would recommend that this policy be considered as an addendum to or revision to the current policy rather than as a standalone policy.

We appreciate your consideration of our recommendations, and look forward to the opportunity to review the policy during the formal public comment period.

Respectfully,


Jessica D. Webb, MBA
CSA Coordinator


Cheryl Austin
CPMT Chair

Reiner, Scott (CSA)

From: Gordon, Rodney (VDSS)
Sent: Wednesday, May 31, 2017 11:17 AM
To: Reiner, Scott (CSA)
Cc: Tomlin, Thomas H. (DJJ); Middle Peninsula - Chuck Walsh (cwalsh@mpnn.state.va.us); Gordon, Rodney (VDSS); Larryschools@aol.com; Mitchell, Margaret (VDH); Mary Davis; Porter, Evelyn (VDSS); Sheriff Clarke; Tara Roane
Subject: Essex CPMT Public Comment

Title	Responses to Audit Findings with Regard to Children's Services Act
Description	<p>Summary: The proposed policy will provide direction to the Executive Director of the Office of Children's Services (OCS) when carrying out his/her duties in response to findings of non-compliance by local CSA programs under State Executive Council (SEC) Policy 4.6 (Denial of Funds). Such non-compliance addresses relevant federal or state law, regulation, SEC or participating agency policy. The proposed policy will delineate the nature of the OCS response to specific audit findings. Such determinations are subject to the Dispute Resolution Process found in SEC Policy 3.2.</p> <p>Three levels of audit findings are proposed:</p> <ol style="list-style-type: none">1. Findings resulting in the recovery of state pool funds on the initial determination of non-compliance2. Findings resulting in corrective action on the first instance of non-compliance and recovery of state pool funds on subsequent determinations of non-compliance3. Repeat findings resulting in prospective suspension of state pool fund reimbursements until corrective action is implemented <p>Intent of Proposed Policy: The proposed policy will provide transparent and objective guidance for OCS determinations in response to audit findings with regard to local CSA programs as the Office of Children's Services carries out its responsibilities to provide administrative oversight of the implementation of the Children's Services Act as specified in the Code of Virginia and policies of the State Executive Council for Children's Services.</p>

Dear Mr. Reiner,

The Essex County Virginia CPMT is opposed to the proposed policy as currently presented and offer the following comments and recommendations:

We would like to have an opportunity to review the entire policy and discern this proposed policy in context.

We recommend that an appeal process be added to the proposed policy.

The proposed policy is unclear as to the degree of non-compliance that would be subject to a sanction; We recommend that for localities where there is chronic non-compliance issues resulting in exposure to fiscal risk a corrective action process be established with clear guidance and direction from OCS to offer remedial help and coaching in order to assist the locality.

We recommend that OCS strengthen the continuity of their best practice guidance; we are aware of times when localities have received conflicting guidance CSA policy interpretation which may have resulted in a non-compliance finding.

Respectfully,



**Rodney E. Gordon
Director
Essex County Department of Social Services
772 Richmond Beach Road
Tappahannock, Virginia 22560
Office: (804) 443-3561
Fax: (804) 443-8254**

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**COUNTY OF YORK-CITY OF POQUOSON
DEPARTMENT OF SOCIAL SERVICES**

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May 19, 2017

RECEIVED
5/24/17

Scott Reiner, Executive Director
The Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Re: Recommendations for Denial of funds policy proposed by the Office of Comprehensive Services (OCS)

The York/Poquoson Department of Social Services is submitting these recommendations regarding a denial of funds policy proposed by OCS. According to the CSA Manual, denial of the CSA state match funding is based on a locality's failure to comply with statutory requirements and policy. However, there are currently no written guidelines in place regarding the denial of funds and the development of corrective action plans. YPDSS appreciates the opportunity to provide recommendations prior to a proposed policy being written by OCS.

In the notice of proposed policy, section 3.4 of SEC policy is cited. This section outlines the dispute resolution process which localities may exercise when denied CSA funding. Although this appeal/due process provides a degree of safeguard for localities that are not in agreement with OCS findings, it is not sufficient in protecting localities from unreasonable fiscal hardship. Further, section 3.4 does not address cause and corrective action.

YPDSS recommends that OCS adopt a similar policy to the denial of funds policy developed by the Virginia Department of Social Services (VDSS) for Title IV-E (a copy of the decision making matrix is attached). This policy was extensively reviewed and received support from The Secretary of Health and Human Services, VDSS, the Virginia League of Social Services Executives (VLSSE), and localities. The policy for denial of IV-E funds requires collaboration between state and locals and has been successful in significantly reducing the Title IV-E error rate statewide. The policy emphasizes state responsibility for providing monitoring and technical assistance while requiring accountability from localities for the administration of the program. Key components of the IV-E denial of funds policy are referenced below.

Ongoing Review Process

In order to address statewide errors in Title IV-E, VDSS, in collaboration with the VLSSE, developed a review process to ensure that local social services agencies remain

in compliance with the IV-E requirements for children in their custody. The period under review (PUR) for a locality is defined as the time period since the last VDSS IV-E review. This is also used as the period for determining repayment of funds.

Identified in the OCS program audit charter dated July 2015; it states that "program audit staff will coordinate audit efforts so as not to duplicate or overlap the work performed by other audit groups; particularly independent external audit resources; local agency internal audit functions; other partnering CSA state agency audits/reviews (Department of Social Services, Department of Medical Assistance Service, Department of Behavioral Health and Developmental Services, Department of Health and Department of Juvenile Justice); Office of the State Inspector General; and the Auditor of Public Accounts." OCS has an established audit process; however, of concern is the timeline of the process (every 3 years) and how this three-year cycle fits with the established PUR, which is the annual fiscal year.

It has already been identified in the OCS FY audit plan 2017-2019 that due to lack of resources, audit reviews, including site visits, will be heavier during FY 18/19. Of concern is that a local agency that may have errors will not receive any technical and/or sufficient audit reviews by OCS to assist in limiting potential financial paybacks for up to 3 FY prior to an OCS program review. We understand that OCS is in the process of hiring additional audit staff to assist in completing local audit reviews.

YPDSS recommends that OCS mimic the policy and audit reviews similar to the Title IV-E policy/process at a minimum on a quarterly/annual basis vs. a three year plan as already established.

Corrective Action Plans

Under the IV-E denial of funds policy, the locality is required to provide full repayment only after a subsequent review process results in failure to obtain an acceptable error rate. Repayment responsibility and the actions to be taken by the local agency and VDSS are described in the shared fiscal accountability matrix (attached). The matrix describes a process for local corrective action plan implementation based on VDSS case review results with graduated fiscal sanctions over time, if the locality continuously fails to meet the 5% payment error and 5% case error threshold. Each level has progressively more stringent requirements, from a minimum of zero repayment to the maximum full federal reimbursement.

The Title IV-E denial of funds limits the time period to a time limited PUR. It does not cap the funds a locality would be required to pay back, but it limits the period of time that

a locality would be responsible to pay back funds based on the PUR. The first payback is at the LDSS CSA basic match rate and the subsequent pay back, after a third corrective action plan, is at the full repayment. A five percent payment error rate is 5% of the IV-E expenditures for the period under review, i.e., the time period since the last VDSS IV-E team review. A five percent case error rate is 5% of the open IV-E foster care cases at the time of the review. If the IV-E case review identifies less than 5% payment error and case error rate for the period under review, then there is no requirement for a local corrective action plan or repayment. The goal for Title IV-E errors is zero percent (0%) and VDSS continues to provide training, technical support and guidance to local departments to ensure this goal is met.

YPDSS recommends that prior to denying funds, OCS provides a locality with technical support and audit reviews, including corrective action plans similar to that defined in the Title IV-E policy for denial of funds.

Training

Finally, YPDSS recommends OCS increase its training opportunities for localities *specific to the correlation between funding and programming*. CSA policy is extremely complex and local governments struggle with the role and responsibilities of OCS / CSA in relationship to other state agencies. There is also a need for OCS to work closely with partner state agencies to provide training on each agency's responsibilities and policies related to CSA.

The VDSS Title IV-E denial of funds policy was extensively reviewed and agreed on by state and local partners and meets the requirements of state oversight and local responsibility for CSA. It is our recommendation that this be used as a guide for development of the OCS denial of funds policy.

Thank you for allowing our organization the opportunity to provide comments.

Sincerely Yours,

A handwritten signature in blue ink that reads "Kimberly Irvine". The signature is written in a cursive, flowing style.

Kimberly Irvine, MP, SPHR
Director



May 24, 2017

VISION:

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

Scott Reiner, Executive Director
The Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Re: Recommendations for Denial of funds policy proposed by the Office of Comprehensive Services (OCS)

The Albemarle County and Charlottesville Community Policy and Management Teams are submitting these recommendations regarding a denial of funds policy proposed by OCS. According to the CSA Manual, denial of the CSA state match funding is based on a locality's failure to comply with statutory requirements and policy. However, there are currently no written guidelines in place regarding the denial of funds and the development of corrective action plans. Albemarle County and Charlottesville CPMTs appreciate the opportunity to provide recommendations prior to a proposed policy being written by OCS.

In the notice of proposed policy, section 3.4 of SEC policy is cited. This section outlines the dispute resolution process which localities may exercise when denied CSA funding. Although this appeal/due process provides a degree of safeguard for localities that are not in agreement with OCS findings, it is not sufficient in protecting localities from unreasonable fiscal hardship. Further, section 3.4 does not address cause and corrective action.

Albemarle County and Charlottesville CPMTs recommend that OCS adopt a similar policy to the denial of funds policy developed by the Virginia Department of Social Services (VDSS) for Title IV-E (a copy of the decision making matrix is attached). This policy was extensively reviewed and received support from The Secretary of Health and Human Services, VDSS, the Virginia League of Social Services Executives (VLSSE), and localities. The policy for denial of IV-E funds requires collaboration between state and locals and has been successful in significantly reducing the Title IV-E error rate statewide. The policy emphasizes state responsibility for providing monitoring and technical assistance while requiring accountability from localities for the administration of the program. Key components of the IV-E denial of funds policy are referenced below.

Ongoing Review Process

In order to address statewide errors in Title IV-E, VDSS, in collaboration with the VLSSE, developed a review process to ensure that local social services agencies remain in compliance with the IV-E requirements for children in their custody. The period under review (PUR) for a locality is defined as the time period since the last VDSS IV-E review. This is also used as the period for determining repayment of funds.

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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

paybacks for up to 3 FY prior to an OCS program review. We understand that OCS is in the process of hiring additional audit staff to assist in completing local audit reviews.

Albemarle County and Charlottesville CPMTs recommend that OCS mimic the policy and audit reviews similar to the Title IV-E policy/process at a minimum on a quarterly/annual basis vs. a three year plan as already established.

Corrective Action Plans

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Albemarle County and Charlottesville CPMTs recommend that prior to denying funds, OCS provides a locality with technical support and audit reviews, including corrective action plans similar to that defined in the Title IV-E policy for denial of funds.

Training

Finally, Albemarle County and Charlottesville CPMTs recommend OCS increase its training opportunities for localities specific to the correlation between funding and programming. CSA policy is extremely complex and local governments struggle with the role and responsibilities of OCS / CSA in relationship to other state agencies. There is also a need for OCS to work closely with partner state agencies to provide training on each agency's responsibilities and policies related to CSA.

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Thank you for allowing our organizations the opportunity to provide comments.

Sincerely Yours,

Phyllis Savides, Chair
Albemarle County CPMT

Diane Kuknyo, Chair
Charlottesville CPMT



Virginia League of Social Services Executives



Catherine Pemberton, President
3908 Old Buckingham Road
Powhatan, VA 23139

May 24, 2017

Scott Reiner, Executive Director
The Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Re: Recommendations for Denial of funds policy proposed by the Office of Comprehensive Services (OCS)

Dear Mr. Reiner:

The Virginia League of Social Services Executives is submitting these recommendations regarding a denial of funds policy proposed by OCS. According to the CSA Manual, denial of the CSA state match funding is based on a locality's failure to comply with statutory requirements and policy. However, there are currently no written guidelines in place regarding the denial of funds and the development of corrective action plans. The League appreciates the opportunity to provide recommendations prior to a proposed policy being written by OCS.

In the notice of proposed policy, section 3.4 of SEC policy is cited. This section outlines the dispute resolution process which localities may exercise when denied CSA funding. Although this appeal/due process provides a degree of safeguard for localities that are not in agreement with OCS findings, it is not sufficient in protecting localities from unreasonable fiscal hardship. Further, section 3.4 does not address cause and corrective action.

The League recommends that OCS adopt a similar policy to the denial of funds policy developed by the Virginia Department of Social Services (VDSS) for Title IV-E. This policy was extensively reviewed and received support from The Secretary of Health and Human Services, VDSS, the League, and localities. The policy for denial of IV-E funds requires collaboration between state and locals and has been successful in significantly reducing the Title IV-E error rate statewide. The policy emphasizes state responsibility for providing monitoring and technical assistance while requiring accountability from localities for the administration of the program. Key components of the IV-E denial of funds policy are referenced below.

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The League recommends that OCS implement policy and audit reviews similar to the Title IV-E policy/process at a minimum on a quarterly/annual basis as opposed to a three year plan as already established.

Corrective Action Plans

Under the IV-E denial of funds policy, the locality is required to provide full repayment only after a subsequent review process results in failure to obtain an acceptable error rate. Repayment responsibility and the actions to be taken by the local agency and VDSS are described in the shared fiscal accountability matrix. The matrix describes a process for local corrective action plan implementation based on VDSS case review results with graduated fiscal sanctions over time, if the locality continuously fails to meet the 5% payment error and 5% case error threshold. Each level has progressively more stringent requirements, from a minimum of zero repayment to the maximum full federal reimbursement.

Mr. Reiner
Page 3
May 30, 2017

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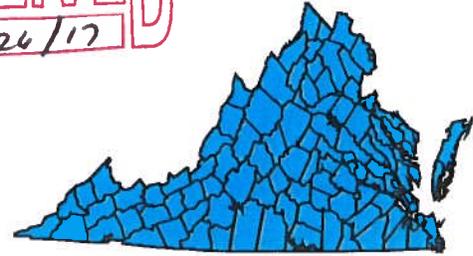
Thank you for allowing our organization the opportunity to provide comments.

Sincerely Yours,



Catherine Pemberton, President
Virginia League of Social Services Executives

RECEIVED
5/26/17



Virginia Association of Local Human Services Officials

May 24, 2017

Scott Reiner, Executive Director
The Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Re: Recommendations for Denial of funds policy proposed by the Office of Comprehensive Services (OCS)

The Virginia Association of Local Human Services Officials (VALHSO) is submitting these recommendations regarding a denial of funds policy proposed by OCS. According to the CSA Manual, denial of the CSA state match funding is based on a locality's failure to comply with statutory requirements and policy. However, there are currently no written guidelines in place regarding the denial of funds and the development of corrective action plans. VALHSO appreciates the opportunity to provide recommendations prior to a proposed policy being written by OCS.

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Thank you for allowing our organization the opportunity to provide comments.

Sincerely,

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Kimberly Irvine,
Legislative Chair

/KI

Title IV-E Foster Care
 Shared Fiscal Accountability Matrix
 Review Processes
 Corrective Action Plans

Level	Corrective Action Plan	Process	LDSS Repayment Rate for Non-correctable & Uncorrected Errors
Baseline – Review identifies less than 5% payment error <u>and</u> case error rate	No Corrective Action Plan required	Review identifies less than 5% payment error and case error rate for the period under review (PUR). PUR is the time period since the last VDSS IV-E team review.	None
Level 0 – Review identifies more than a 5% payment error <u>or</u> case error rate	No Corrective Action Plan required	Locality will create a self-identified plan to address the error rates. The VDSS IV-E team will return after 6 months (or earlier upon LDSS request and review team availability) for a subsequent review. PUR is the time period since the last VDSS IV-E team review.	None
Level 1 – Review identifies more than a 5% payment error <u>or</u> case error rate 6 months after a Level 0 finding.	Level 1 Corrective Action Plan required	An initial Corrective Action Plan is required to improve internal controls and administration of IV-E program and payment compliance. This Corrective Action Plan will be in effect for 12 months and will include 2 reviews during these 12 months on a semi-annual basis from the VDSS IV-E team. PUR is the time period since the last VDSS IV-E team review.	None
Level 2 – After completion of Level 1 Corrective Action Plan and the 2 semi-annual reviews, the reviews continue to identify that the payment error rate <u>or</u> the case error rate continues to exceed the 5% threshold.	Level 2 Corrective Action Plan required	VDSS will conduct a program compliance review in 90 days after completion of Level 1 Corrective Action Plan. After the 90 day review, if the 5% threshold is not met, a Level 2 Corrective Action Plan must be implemented for the next 6 months to improve internal controls and administration of IV-E program and payment compliance. This Corrective Action Plan will be in effect for 6 months and will include 90 day reviews during these 6 months from the VDSS IV-E team. PUR is the time period since the last VDSS IV-E team review.	Repayment at LDSS CSA basic match-rate.

Title IV-E Foster Care
 Shared Fiscal Accountability Matrix
 Review Processes
 Corrective Action Plans

Level 3 – After completion of Level 2 Corrective Action Plan, the reviews continue to identify that the payment error rate <u>or</u> case error rate continues to exceed the 5%	Level 3 Corrective Action Plan	VDSS will conduct a program compliance review in 90 days after completion of Level 2 Corrective Action Plan. After the 90 day review, if the 5% threshold is not met, a Level 3 Corrective Action Plan will be implemented until such time the LDSS is able to pass two consecutive 90 day reviews with an error rate below 5%.	Full repayment of Federal portion.
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5% payment error rate = 5% of expenditures as reported in LASER for Budget Line 811, IV-E Foster Care for the period under review (PUR).

5% case error rate = 5% of open IV-E FC cases as reported in OASIS at the time of the review.

The King William County CPMT has questions and concerns about several aspects of the Proposed Policy: Responses to Audit Findings With Regard to Children's Services Act.

- The proposed levels of audit findings do not represent a progression of consequences. Also, there is concern that all levels in the proposal require recovery or suspension of state funds. There is no option of findings resulting in a corrective action plan without suspension or recovery of funds.
- "Repeat findings" is not defined – twice? Three times?
- Elements that would result in recovery of state funds are not defined. Are some instances of failure to follow policy more egregious than others?
- The proposed policy does not take into account the high turnover rate in local CSA personnel statewide without ongoing training in CSA policy that is likely to result in human error and may be a significant contributing factor to negative audit results.

The KWC CPMT endorses the public comment of the Virginia Association of Local Human Services Officials regarding this proposed policy.

Ann G. Porter, KWC CSA Coordinator
For the KWC CPMT
P.O. Box 187
King William, VA 23086



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

MEMORANDUM

TO: State Executive Council for Children's Services

FROM: Janet Van Cuyk, Assistant Director
Office of Children's Services

RE: SEC Policy and Guideline Technical Review Work Plan

DATE: June 15, 2017

I. Action Requested

The State Executive Council for Children's Services (SEC) is requested to authorize the Office of Children's Services (OCS) to:

1. Conduct a technical review and revision of the "Policy Manual for the Children's Services Act" (Policy Manual). This review would constitute an exempt action for policy making pursuant to SEC Policy 2.4.8, Public Participation in Policy-making Actions; and
2. Incorporate SEC approved guidelines that are already incorporated by reference into or substantially included in the text of the policies.

If there are any changes objected to as not being technical and, therefore, not subject to the exemption, the redrafted policy will not be presented to the SEC for approval and will be placed in the OCS policy-review work plan for substantive review.

II. Background

The SEC has adopted 21 policies some of which have not been reviewed since the 1990s (see Appendix A). These policies were adopted at different times over the course of 24 years and have varying formats. The SEC has also adopted eight guidelines some of which have been incorporated by reference in or are already substantially included into policies but have not been entirely incorporated into the Policy Manual (see Appendix B).

SEC Policy 2.4 (Public Participation in Policy-making Actions), adopted June 23, 2016, established a three stage policy making or review process. Below are several exemptions to the three stages that are applicable to this request:

1. Actions that consist of changes in style or form or are corrections of technical errors in existing SEC policies; and
2. Actions that are necessary to conform to changes in Virginia statutory law or appropriations act where no agency discretion is involved.

In order to prepare for a subsequent substantive review of all of these SEC-approved documents, OCS is recommending the SEC to authorize OCS to reformat and revise each of the 21 SEC policies to achieve clarity and consistency.

OCS is also recommending SEC to authorize the following SEC-approved guidelines to be incorporated into the relevant policies:

1. Interagency Guidelines on Foster Care Services for Specific CHINS;
2. Guidelines for Determining Levels of Care for Foster Care Services with Licensed Child Placing Agencies;
3. Use of State Pool Funds for Community-based Behavioral Health Services; and
4. Supplemental Allocation Guidelines.

OCS is also recommending the following guidelines to be authorized to be incorporated into the existing policies as they do not conflict with existing policies:

1. Guidelines for the Use of Treatment Foster Care Under the Comprehensive Services Act; and
2. Standardized Service Names.

III. Conclusion

The SEC is requested to authorize the OCS to:

1. Conduct a technical review and revision of the “Policy Manual for the Children’s Services Act.” This review would constitute an exempt action for policy making pursuant to SEC Policy 2.4.8, Public Participation in Policy-making Actions;
2. Incorporate SEC approved guidelines that are already incorporated by reference into of substantially included in the text of the policies; and
3. Incorporate the two guidelines that do not conflict with existing policies into the Policy Manual.

This review will not result in any policy changes. Should there be any objections to any policy subject to this review, the policy will be moved from consideration by the SEC and moved to the substantive review work plan which will be subject to the three-stage review process.

**STATE EXECUTIVE COUNCIL FOR CHILDREN'S SERVICES
POLICIES**

Policy Number	Policy Title	Effective Date/ Last Review
1	Intent and Purpose	Jul-15
2.1	State Executive Council for Children's Services	Jul-16
2.2	Office of Children's Services	Jul-16
2.3	State and Local Advisory Team	Jul-16
2.4	Public Participation in Policy-making Actions	Jun-16
3.1	Community Policy and Management Team	Jul-16
3.2	Family Assessment and Planning Team	Jul-16
3.3	Family Engagement	Mar-10
3.4	Dispute Resolution Process	Dec-13
3.5	Records Management	Aug-98
3.6	Mandatory Uniform Assessment Instrument	May-08
4.1	Eligible Populations	Jul-08
4.2	Payment for Services and Change of Legal Residence	1994
4.3	"Carve-Out" of Allocation for Development of New/Expanded Services	Apr-13
4.4	Restrictions on Pool Fund Usage	Jul-16
4.5	Fiscal Procedures	1997
4.6	Denial of Funds	Jun-11
5.1	CSA Data Set	Mar-11
6.1	Intensive Care Coordination	Apr-13
6.2	Treatment Foster Care	Jun-14
6.3	Community-based Behavioral Health Services	Jul-13

**STATE EXECUTIVE COUNCIL FOR CHILDREN'S SERVICES
GUIDELINES**

Associated Policy	Title of SEC Guideline	Effective Date/ Last Revised
4.1 (Eligible Populations)	Interagency Guidelines on Foster Care Services for Specific CHINS	Jul-08
6.2 (Treatment Foster Care)	Guidelines for Determining Levels of Care for Foster Care Services with Licensed Child Placing Agencies	May-15
6.2 (Treatment Foster Care)	Guidelines for the Use of Treatment Foster Care Under the Comprehensive Services Act	Apr-12
6.3 (Community-based Behavioral Health Services)	Use of State Pool Funds for Community-based Behavioral Health Services	Jul-13
None	Utilization Review Guidelines	Jun-09
None	Utilization Management Guidelines	Jun-09
4.5 (Fiscal Procedures)	Supplemental Allocation Guidelines	Jul-10
5 (Data Reporting)	Standardized Service Names	Jun-14