

***CHILDREN'S SERVICES ACT
PROGRAM AUDIT***

**Augusta/Staunton/Waynesboro
*Self-Assessment Validation***

Final Audit Report No. 13-2022

June 28, 2023



Office of Children's Services
Empowering communities to serve youth

Report Disclaimer

Due to the COVID-19 pandemic, onsite visits to validate management's conclusions have been suspended until further notice. In lieu of onsite visits, self-assessment validation activities were conducted remotely.



COMMONWEALTH of VIRGINIA

Scott Reizer, M.S.
Executive Director

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

June 28, 2023

Lisa Shiflett, CPMT Chair
Shenandoah Valley Social Services
PO Box #7
Verona, VA 24482

RE: Augusta/Staunton/Waynesboro CSA Program Self-Assessment Validation (SAV)
Final Report, File No. 13-2022

Dear Ms. Shiflett,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2022, the Augusta/Staunton/Waynesboro Community Policy, and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation completed by the Augusta/Staunton/Waynesboro CSA program on March 4, 2022, and covering the period January 1, 2021 through December 31, 2021, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion of the Augusta/Staunton/Waynesboro CPMT that no significant observations of non-compliance were found in the design or operation of the processes or services on behalf of the Augusta/Staunton/Waynesboro CSA Program. The explanation for our assessment results are as follows:

The Augusta/Staunton/Waynesboro CPMT concluded only non-significant compliance and/or internal control observations were notable. A summary of non-compliance and /or internal control enhancements reported by the CPMT are included as Attachment A. However, validation procedures documented significant non-compliance observations not identified by the CPMT. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics are detailed on page 2 of this report.

SIGNIFICANT NON-COMPLIANCE - REPEAT OBSERVATION
<p>Non-public members serving on FAPT did not complete the Statement of Economic Interest (SOEI) form as required by Code of Virginia sections § 2.2-5207. The guidance provided in OCS Administrative Memo #18-02 Statement of Economic Interest Filings for FAPT and CPMT Members directs that the forms be completed upon appointment and filed with the clerk of the local governing body, who is responsible for maintaining these filings as public records for five years. A similar observation was identified in audit report dated April 17, 2017.</p>
RECOMMENDATIONS
<p>The CPMT should ensure all parties not representing a public agency and currently serving roles on FAPT complete the SOEI (long form) immediately. The CSA office should ensure that filings are maintained in accordance with the Administrative Memo 18-02 dated January 16, 2018.</p>
CLIENT COMMENT
<p>“It was determined that one member had not provided the SOEI. The CSA office reached out to the member on 3/29/23 and it was received back the same day. All current members are up to date at this time.”</p>
AUDITOR COMMENT
<p>The SOEI form was provided as verification of completion. However, affirmation statement was not signed and dated by the FAPT member.</p>

The Office of Children’s Services respectfully requests that you submit a quality improvement plan (QIP) to address the observation outlined in this report no later than 30 days from receipt of this report. We ask that you notify this office as QIP tasks identified to address significant observations are completed. OCS will conduct a follow-up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Augusta/Staunton/Waynesboro Community Policy and Management Team, CSA staff and partners for their contributions completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation provided by Lisa Shiflett, Shenandoah Valley DSS Director and Andrea Jones, CSA Coordinator during our review. Both Ms. Shiflett's and Ms. Jones's efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Timothy Fitzgerald, Augusta County Administrator
Leslie Beauregard, Staunton City Manager
Michael G. Hamp II, Waynesboro City Manager
Susan Hughes, CPMT Fiscal Agent
Andrea Jones, CSA Coordinator

Attachment



CSA Self-Assessment Validation
Augusta/Staunton/Waynesboro CSA Program Audit- SAV
Summary of Self-Reported Non-Compliance Observations and Internal Control Enhancements

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/Status
None of our teams currently have parent representatives.	COV §2.2-5205 COV §2.2-5207	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	6/5/2023 Completes
Submit to the Department of Behavioral Health & Developmental Services information on children under the age of 14 and adolescents aged 14 through 17 for whom an admission to an acute care psychiatric or residential treatment facility licensed pursuant to Article 2 (§ 37.2-403 et seq.) of Chapter 4 of Title 37.2, exclusive of group homes, was sought but unable to be obtained by reporting entities. Such information shall be gathered from the family assessment and planning team, or participating community agencies authorized in § 2.2-5207. Information to be submitted shall include: a. The child or adolescents date of birth; b. Date admission was attempted; and c. Reason the patient could not be admitted into the hospital or facility.	COV § 2.2-5206	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2022 Completed
CSA has purchased Medicaid eligible residential services for a youth in foster care who no longer met Medicaid criteria for placement, but who did not have a step-down placement in place.	Current Appropriation Act SEC Policy 4.4.3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2022 Completed

Auditor Comment: Augusta/Staunton/Waynesboro CPMT self-reported the non-compliance observations in the table above as non-significant. However, the criteria for compliance are established in the Code of Virginia. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth.



CSA Self-Assessment Validation
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Parental Financial Contribution: CSA/CPMT currently has process in place for this that works. Submitting copayments to DCSE has presented several significant issues that CPMT will need to address.	COV § 2.2-5206 item 3 COV § 2.2-5208 item 6 ARMICS ²	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2022 Complete
Confidentiality: CSA Office does not always receive CSA consent to exchange information prior to FAPT. Process implemented prior to COVID-19 was to not have a FAPT meeting before receiving this information, however this rule was relaxed when local agencies moved to telework in 2020. We still need to finalize and implement a permanent plan moving forward for getting these documents	COV §2.2-5210 SEC Policy 3.3 ARMICS ²	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2022 Completed
CPMT Meetings: At least one copy of the proposed agenda and all agenda packets and, unless exempt, all materials furnished to members of a public body for a meeting shall be made available for public inspection at the same time such documents are furnished to the members of the public body. CSA Coordinator does not currently share this information outside of sending it to CPMT members. <i>Auditor Note: Subject to FOIA; available upon request.</i>	§ 2.2-3707 ARMICS ^{1,3}	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6/5/23 Completed

ARMICS (Department of Accounts, Agency Risk Management, and Internal Control Standards):

- ¹Control Activities: Documentation
- ²Control Environment: Governance, Policies and Procedures
- ³Information and Communication
- ⁴Monitoring



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All children receiving CSA state pool funded services shall have Child and Adolescent Needs and Strengths (CANS) assessments completed in accordance with the parameters specified in their local policy. We have a process in place for this that works very well, but we are still not 100% compliant.	SEC Policy 3.6 ARMICS ^{1,4}	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	6/30/2022 Complete
Records Management: Each CPMT shall ensure collection of child specific documentation to demonstrate compliance with the CSA. Review of IFSPs revealed inconsistencies in identifying case managers. CSA office has struggled to obtain physical consents to release information while meeting virtually. IFSPs generally lack time frames for services.	SEC Policy 3.3 ARMICS ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/30/2022 Complete

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