



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 6, 2019

Mr. Jason Miller, CPMT Chair
Bath County CSA Program
P. O. Box 7
Warm Springs, VA 24484

RE: Bath County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 48-2019

Dear Mr. Miller,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Bath County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local CSA Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 10, 2019 to perform the independent validation phase of the process.

Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Bath County CSA program, our independent validation:

Concur

Partially Concur

Does Not Concur

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

The Bath County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified deficiencies indicating non-compliance with the statutory requirements of CSA. This is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Bath County CSA Program are detailed on page two.

SIGNIFICANT NON-COMPLIANCE – REPEAT OBSERVATION

1. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with Code of Virginia (COV) [§ 2.2-5206](#), items 6 and 13. CPMT monthly meeting minutes and accompanying reports did not evidence utilization management/utilization review (UM/UR) activities to include:
 - A. review of local and statewide data provided in the management reports on the number of children served, children placed out of state, demographics, types of services provided, duration of services, service expenditures, child and family outcomes, and performance measures.
 - B. tracking the utilization and performance of residential placements using data and management reports to develop and implement strategies for returning children placed outside of the Commonwealth, preventing placements, and reducing lengths of stay in residential programs for children who can appropriately and effectively be served in their home, relatives homes, family-like setting, or their community.

The non-compliance observation referenced in this report was also identified in the prior audit report issued January 10, 2017. The Bath County CPMT submitted a quality improvement plan with June 15, 2017 as the target date for completion. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure timely implementation of the plan and that the actions taken are continuously working as intended.

RECOMMENDATIONS

The Bath County CPMT should immediately initiate and going forward periodically review OCS financial and performance reports depicting local and statewide data as required by CSA statute to demonstrate compliance. Tools to effect a continuous quality improvement process (i.e utilization management) are available on the CSA website and listed below for your convenience.

- [CQI Dashboard](#)
 - [CQI Dashboard Instructions Manual](#)
- [CQI Dashboard Codes](#)
- [CQI Documentation Template with Instructions \(Download\)](#)
- [CQI Terms and Definitions](#)
- [CQI Training](#)

CLIENT COMMENTS

“We did implement UM changes after the last audit. While they may not have been sufficient for this review, we continue to update/improve of our efforts. Including using OCS UM resources.”

SIGNIFICANT NON-COMPLIANCE OBSERVATION

2. Membership of the CPMT and the Family Assessment and Planning Team (FAPT) The CPMT and FAPT do not have parent representatives on the respective teams as required by Code of Virginia (COV) [§ 2.2-5205](#) and [§ 2.2-5207](#). There was no documentation available to evidence local efforts to fill vacant roles. The absence of the parent representatives impedes the intent of CSA to create a collaborative system of services and funding that includes both representatives of public agencies and the community.

RECOMMENDATIONS

The CPMT should ensure that composition of the CPMT and FAPT meets the minimum requirements established by CSA statutes. The CPMT should actively recruit to fill the vacancies. Documentation of recruitment efforts should be maintained.

CLIENT COMMENTS

“As for the parent reps, we did try in the past. We now have a parent rep for FAPT as of 8/2/19. We are still searching for a CPMT rep and have documented our attempts.”

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Bath County CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation provided by Kim Brown, CSA Coordinator during our on-site visit. Ms. Brown's efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Ashton N. Harrison, Bath County Administrator
Pamela H. Webb, CPMT Fiscal Agent
Kim Brown, CSA Coordinator