



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 8, 2017

Kimberly Sobey, CPMT Chair
Bland County Dept of Social Services
612 Main Street
Bland, VA 24315

RE: Bland County CSA Program Self-Assessment Validation, File No.18-2015

Dear Ms. Sobey,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2016, the Bland County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 23, 2016 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 Bland County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

Validation procedures of the locally prepared CSA Self-Assessment Workbook identified major deficiencies¹ indicating non-compliance in the local CSA program. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

accordance with the laws of the Commonwealth. Specifics pertaining to the Bland County CSA Program are detailed below.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. Adequate measures have not been established and/or implemented by the Bland CPMT to evaluate and ensure accountability and effectiveness of the locally managed CSA program. Opportunities for improvement were noted based on instances of non-compliance with CSA statutory requirements.

- The Bland CPMT has established performance goals and documented coordination of long-range planning. However, program oversight by the CPMT has not included review and/or assessment of specific reports that summarize, in aggregate, program outcomes to demonstrate accomplishment of local program goals objectives and effectiveness of the services provided correlated with the funds expended.
- At a minimum the Code of Virginia requires CPMT to review and analyze data in management reports provided by OCS, 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. In addition, the CPMT should track 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.

The ability and likelihood of the CPMT to adequately monitor and provide oversight of the local CSA program is an essential component of organizational governance. The absence of a program evaluation to ensure that the goals and objectives of the program are met ultimately impacts the CPMT efforts to better serve the needs of the youth and families in the community to maximize the use of state and community resources.

CRITERIA: COV § 2.2-5206, Items 4, 6, and 13, Agency Risk Management and Internal Control Standards, (ARMICS), Control Environment, Control Activities

2. Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Three (3) case files were reviewed by the auditor to confirm that required documentation was maintained in support of and to validate FAPT and/or multi-disciplinary team (MDT) referral, and CPMT funding decisions. The results of the examination identified opportunities for improvements. All three of the cases files examined omitted documentation to demonstrate compliance with CSA requirements key to the coordination and service planning by FAPT. Data omitted from case files reviewed were discharge Child and Adolescent Needs and Strengths assessments (CANS) (2 cases), and provider treatment plans and progress notes (1 case).

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS CONTINUE

Insufficient data collection and poor document management in service planning may affect efficiency and effectiveness of the local program. Further, this condition fosters an environment that makes the program more susceptible to potential loss of accessibility to State funding in support of local programs as a result of non-compliance with CSA statutes regarding service planning and access to pool funds.

CRITERIA: COV 2.2-5206, Item 3, § 2.2-5208 Item 6, Requirements and Recommendations Frequency of Administration *updated* December 2013*, CSA Policy Manual 3.5 Records Management

RECOMMENDATIONS

- The CPMT should track the performance of their identified measurable criteria outlined in their long-range plan for evaluating the achievement of its stated goals and objectives and report progress to all stakeholders at least annually.
- The CPMT should review and analyze data in management reports provided by OCS at least annually and provide this information to all stakeholders.
- The CPMT should ensure that all required documentation is maintained in client case files, such as treatment plans and progress reports. The CPMT should periodically perform a quality assurance review on case files to ensure they are complete.
- The CPMT and the FAPT should ensure that CANS assessments (initial, re-assessment and discharge) are completed in CANVaS and maintained in client records.

CLIENT COMMENT

1. "Bland County CPMT concurs and the CPMT will be presented with the long-term goals and objectives report at the March meeting and this report will be presented to all CPMT's stakeholders. This report will also be presented annually.
2. CPMT partially concurs- Bland County CPMT reviews the financial portion of the program and presents reports monthly and compares with the local budget to assure the financial portion of the program. A report has been prepared to present at the March meeting for the utilization management of the program. This report will be presented quarterly.
3. CPMT partially concurs – Bland County CPMT maintains all required documentation in the client case files. At the March meeting CPMT will begin the schedule to perform a quality assurance review on case files."

CLIENT COMMENT CONTINUES

4. "CPMT does not concur – CANS assessments are completed in CANVaS and maintained in the client's case file. Initial, re- assessments were being completed. The discharge CANS are now being placed in the files as well. This was corrected soon after our audit."

The Office of Children's Services respectfully requests that you submit a quality improvement plan 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 quality improvement 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 Bland County Community Policy and Management Team and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Sharon May, CSA Coordinator during our on-site visit. Ms. May's efforts enabled the audit staff to quickly 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
Program Auditor

cc: Scott Reiner, Executive Director
Dr. Eric Workman, Bland County Administrator
and Fiscal Agent
Sharon May, CSA Coordinator
Stephanie Bacote, Program Audit Manager
SEC Finance and Audit Committee