



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

May 28, 2019

Ms. Susan Goad, CPMT Chair
P.O. Box 99
Daleville, VA 24083

RE: Botetourt County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 44-2019

Dear Ms. Goad,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Botetourt 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 March 7, 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 Botetourt County CSA program, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion reported by the Botetourt County CPMT. We agree that no significant observations of non-compliance were identified in the design or operation of the processes or services conducted on behalf of Botetourt County CSA. However, we do not concur that there were no significant internal control weaknesses. The explanation for our assessment results are as follows:

The Botetourt County CPMT concluded that there were no significant non-compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified an internal control weakness pertaining to documentation. An adequate system of internal controls is contingent upon consistent and proper application of established policies, procedures, and practices affecting CSA funded activities, as well as oversight by the governing authority to ensure the program is operating accordingly. Breakdowns in an organizations internal control structure are considered significant. Specifics pertaining to the Botetourt County CSA Program are detailed on page 2 of this report.

SIGNIFICANT INTERNAL CONTROL WEAKNESS

All six (6) client case files were examined to validate conclusions reported by the by Botetourt County CPMT. At least one (1) exception was noted in three (3) of the six (6) cases examined. The results of that review indicate improvement is needed in the documentation of individual client service plans. Specifically, Individual and Family Services Plans (IFSPs) did not always clearly document one or more of the following data elements: needs, parent/guardian signature, and/or discharge plan. While services plans were updated periodically, these specific data elements were not always addressed in newly updated documents. Exceptions in service planning documentation are deemed significant, as they are critical to evidencing the appropriateness of services and compliance with CSA funding requirements.

Omitted IFSP Data Elements	
Description	# of Occurrences
Client Needs	3 of 6
Discharge Plans	3 of 6
Parent/Guardian Signature	2 of 6

Criteria: COV [§ 2.2-5208](#); CSA Policy Manual Section 3.5, Records Management; Agency Risk Management and Internal Control Standards (ARMICS), Control Activities

RECOMMENDATIONS

The CSA Coordinator and the FAPT should ensure that minimum documentation requirements are met and correspondence is maintained in the client case file or readily accessible in order to substantiate services planning decisions. Someone other than the CSA Coordinator should perform periodic case reviews to establish quality control of client records and to ensure compliance with CSA Policy and statutory requirements. As a component of the quality control process, the CPMT should consider incorporating use of the [CSA Documentation Inventory](#), which is available on the CSA website.

CLIENT COMMENTS

“The majority of IFSP’s are initially signed by clients at the FAPT meeting. There may be instances when the parents are not in attendance at follow-up FAPT meetings and IFSPs were not signed. In the future, we will work with case managers to provide a copy of the IFSP to parents who are not in attendance to obtain their signature. We have also made changes to the IFSP form to include sections for needs, strengths and discharge planning including the anticipated date of discharge and a summary of efforts made towards discharge. These elements will now be part of the discussion at the FAPT meetings and should correct the issue.”

The Botetourt County CPMT has submitted a quality improvement plan to address the observations included in this report. 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.

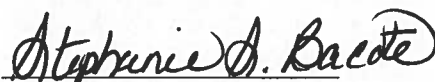
Ms. Susan Goad, CPMT Chair

May 28, 2019

Page 3

We would like to thank the Botetourt 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 Sandra Moran, CSA Coordinator during our on-site visit. Ms. Moran'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
Gary Larowe, Botetourt County Administrator
Anthony Zerilla, CPMT Fiscal Agent
Sandra Moran, CSA Coordinator