



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 2, 2018

Ms. Sari Goff, CPMT Chair
Charlotte County CSA Program
POB 440
Charlotte Courthouse, VA 23923

RE: Charlotte County Children's Services Act (CSA) Program Audit Self-Assessment
Validation, File No. 36-2018

Dear Ms. Goff,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the Charlotte 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 20, 2018 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 Charlotte County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Charlotte 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 Charlotte County CSA. The explanation for our assessment results are as follows:

The Charlotte 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 a deficiency 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 accordance with the laws of the Commonwealth Specifics pertaining to the Charlotte County CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Five client case files reviewed by Charlotte County CSA were selected to validate conclusions reported by the CPMT. Of the five cases examined, one included the provision of services to a youth older than 18 years of age that was ineligible to access state pool funds for non-educational purposes. The specifics were as follows:

Code of Virginia § 2.2-5212 Eligibility for state pool of funds states "B. For purposes of determining eligibility for the state pool of funds, "child" or "youth" means (i) a person younger than 18 years of age or (ii) any individual through 21 years of age who is otherwise eligible for mandated services of the participating state agencies including special education and foster care services. The Charlotte County CSA program authorized funding for residential/group home and special education private day services from 2/28/2017 through November 30, 2017. The youth in question was eligible for mandated special education services identified in the Individualized Education Program (IEP) as special education private day. However, the client was not eligible for residential/group home services because the revised IEP identified private day as the least restrictive placement.

Based on invoices for services funded for the period March 2017 through November 2017, Charlotte county expended \$106,278 for residential/group home services (room and board, daily supervision, medical health, and supplemental therapies). The state share of the total cost of questionable expenses reimbursed to Charlotte County was \$82,854.33.

RECOMMENDATIONS

1. Prior to authorizing funding and approving expenditures for payment, the CPMT and the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding, to include validation of client's eligibility to access the state pool of funds.
2. The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, including whether the CPMT agrees with the observations regarding questioned costs. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director of whether the identified actions are acceptable or any additional actions that may be required.

CLIENT COMMENTS

During a most recent audit of CSA procedures in Charlotte County, it was founded that a youth was ineligible to access state pool funds for non-educational services from 2/28/17 through 11/30/17 based on the student's IEP.

(a) On the prior notice page under action proposed it states, The action proposed by the Charlotte County Public School System is to offer the youth an Individualized Education Plan (IEP) to appropriately provide for his educational needs. The youth will reside and be educated at _____. This proposal for him to reside and be educated at the current facility was made to offer him a free and appropriate public education in the least restrictive environment. This decision was not refused nor rejected, and prior notice was signed by the parent giving this consent for services to be implemented. In a document released in May 2013 by the Virginia Department of Education entitled, *Guidance on Prior Written Notice in the Special Education Process*, page 1 states: The purpose of providing prior written notice to a parent is to: provide comprehensive documentation of the proposed and refused actions made, and to ensure that informed parental consent is obtained.

(b) Located within the Present Level of Academic Achievement and Functional Performance, it is notated under Behavior/Social-Emotional that the youth continues to intermittently display behaviors that impede his ability to meet his potential in the academic and residential setting. Such behaviors, as documented in the present level include self-injurious behaviors. These behaviors also require around the clock supports that could not be offered at home or school.

In making these points regarding this particular IEP, the nature and overall intention of this document was to ensure that his residential and educational needs were met. The body of the text clearly states that all parties agree the youth should continue to reside and be educated at the current facility. The services provided to this particular individual were in the youth's best interest and our locality approved the services with the intent of supporting our mission, vision and values. We appreciate any reconsideration you could give to the findings. If not, please note that we plan to appeal.

Thank you.

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.

Ms. Sari Goff, CPMT Chair

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We would like to thank the Charlotte 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 that was provided by Amanda Lee, CSA Coordinator during our on-site visit. Ms. Lee'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
Russell B. Clark, Jr., Charlotte County Administrator
Norma Tuck, CPMT Fiscal Agent
Amanda Lee, CSA Coordinator
SEC Finance and Audit Committee