



COMMONWEALTH of VIRGINIA

OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

Scott Reiner, M.S.
Executive Director

March 27, 2017

Diane Kuknyo, CPMT Chair
Charlottesville Dept. of Social Services
PO Box 911
Charlottesville, VA 22902

RE: City of Charlottesville CSA Program Self-Assessment Validation, File No.18-2015

Dear Ms. Kuknyo,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2016, the City of Charlottesville 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 1, 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 City of Charlottesville CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the City of Charlottesville 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 City of Charlottesville 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 City of Charlottesville CSA Program are detailed below.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. The composition of members serving on City of Charlottesville FAPT does not meet the membership requirements established by CSA statute. The absence of the parent representative from the team responsible for service planning could potentially impede the achievement of the highest degree of multi-disciplinary collaboration as service planning is contingent upon all members. The CPMT did identify this deficiency in their self-assessment submission; however, they did not submit a corrective action plan and at the time of the on-site visit had not obtained a parent representative.

CRITERIA: Code of Virginia (COV) § 2.2-5207, CSA Policy Manual 3.2.1 Establishment, Appointment, and Membership

2. Internal controls established by CSA statutes and local policy were not effectively implemented by the CPMT in order to safeguard against conflicts of interest pertaining to the referral of services and approval of access to CSA pool funds by eligible youth and their families. Non-public members serving on the FAPT did not complete the Statement of Economic Interest (SOEI) form as required by statute. The Code of Virginia requires an annual disclosure of economic interest for non-public members serving on the CPMT and FAPT. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds may have been significantly reduced since the required parties did not appropriately disclose personal interests.

CRITERIA: COV § 2.2-3100, §2.2-3101, §2.2.-5205, §2.2.-5207, §2.2.-5210

3. Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Four (4) of thirty-seven (37) case files (11%) reviewed by the City of Charlottesville CSA office were examined 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. Three (3) of the four(4) case 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 are depicted in the table below:

Description	# of Cases	Error Rate
Missing evidence of discharge planning	3	75%
Missing Treatment Plans	2	50%
Missing Progress Notes	2	50%
Child and Adolescent Needs and Strengths assessments (CANS) initial, annual and/or discharge	1	25%

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, § 2.2-5210, CANS Frequency of Administration updated 2013, CSA Policy Manual 3.5 Records Management

4. Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State CSA policies and procedures were not met. Eligibility for funding for services through the state pool of funds, per Code of Virginia § 2.2 5212 requires use of a uniform assessment instrument to access funds.

The CANS Assessment is the mandatory uniform assessment instrument approved by the State Executive Council (SEC). In one case Charlottesville had not completed the annual CANS after the initial CANS in May 2012. Per CSA Policy, a CANS assessment is required initially and at least annually. The associated questioned cost equaled \$5,270.09 (state share).

CRITERIA COV § 2.2-5212, CSA Policy Manual Sections 3.6 Mandatory Uniform Assessment Instrument (Adopted December 18, 2007, Updated May 12, 2008), 4.6 Denial of Funds (Adopted June 23, 2011) CANS Frequency of Administration updated 2013

RECOMMENDATIONS

- The CPMT should ensure compliance with the statutory requirement and acquire a parent representative to serve on the FAPT.
- The CPMT should ensure that the SOEI forms are completed immediately for all non-public participating members of the FAPT. Forms should be updated annually and retained in accordance with records retention procedures.
- 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.
- The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, to address whether the funds describe in item above will be voluntarily restored. 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 COMMENT

“The Charlottesville CPMT is invested in continuous improvements to our CSA program and is regularly evaluating and implementing enhancements to policies and procedures. Measures to mitigate any non-compliance observations were immediately implemented following completion of the self-assessment.”

The CPMT has submitted a complete and satisfactory quality improvement plan addressing all observations which included tasks, responsible parties, and target completion dates. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the City of Charlottesville 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 Katie Ralston, CSA Coordinator during our on-site visit. Ms. Ralston’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
Maurice Jones, City Manager
Charles Philippin, Fiscal Agent
Katie Ralston, CSA Coordinator
Stephanie Bacote, Program Audit Manager
SEC Finance and Audit Committee