



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

August 15, 2019

Edward Dunn, CPMT Chair  
Piedmont Health District  
P.O. Box# 700  
Farmville, VA 23901

RE: Cumberland County CSA Program Self-Assessment Validation, File No. 25-2019

Dear Mr. Dunn,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2019, the Cumberland 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 18, 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 Cumberland County CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

with the conclusion reported by the Cumberland 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 Cumberland CSA Program. The explanations for our assessment results are as follows:

***Validation procedures of the locally prepared CSA Self-Assessment Workbook identified deficiencies 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 Cumberland County CSA Program are detailed on page 2 through 4.***

### SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. Adequate measures were not always consistently applied to ensure effective and efficient use of financial resources that could be used to offset the costs incurred for CSA pool funded services. The Code of Virginia (COV) §2.2-5206 directs the CPMT to “establish quality assurance and accountability procedures for program utilization and funds management.” CSA pool funds were used for foster care maintenance expenses in lieu of Title IV-E funds for an eligible youth determined eligible for Title IV-E for the months of June 2018, October 2018 through December 2018. The total questioned cost equals \$5,468 of which, \$3,805.73 represented the state share.

**CRITERIA:** COV§ 2.2-5206; § 2.2-5211

2. The composition of members serving on Cumberland County CPMT and FAPT does not meet the membership requirements established by CSA statute and local policy. Both teams are missing the parent representatives. CPMT minutes do not evidence any recruitment efforts to obtain parent representatives.

**CRITERIA:** COV§ 2.2-5205; § 2.2-5207

3. Formal performance measures and utilization management practices and procedures to assess overall program effectiveness have not been established in accordance with 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. reviewing local and statewide data provided in the management reports on the number of children placed out of state, demographic, types of services provided, duration of services, services 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, relative’s homes, family-like settings, or their community.

Utilization management is a key element in the Community Policy and Management Team’s (CPMT) monitoring activities and assessing the appropriateness and effectiveness of services purchased, which is critical to ensure the CPMT is well informed when carrying out its decision-making responsibilities.

**CRITERIA:** COV§ 2.2-5206, Items 6, and 13

### RECOMMENDATIONS

1. The FAPT and CPMT should determine if another source is available prior to paying for the service through CSA state pool funding.
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 based on SEC approved policy 4.7 Response to Audit Findings of whether the identified actions are acceptable or any additional actions that may be required.
3. The CPMT should engage in recruitment efforts to secure parent representatives to serve on the CPMT and FAPT as required by the Code of Virginia. Documentation should be maintained to support recruitment activities and outcomes noted in the CPMT minutes.
4. The CPMT should review and analyze data in management reports provided by OCS at least annually and provide this information to all stakeholders. To aid this effort, OCS recently developed a dashboard to assist localities in developing Continuous Quality Improvement (CQI) activities. Below is a link to the dashboard as well as training material and instructions.  
<https://www.csa.virginia.gov/Resources/ContinuousQualityImprovement>

### CLIENT COMMENT

1. "As a member of FAPT, the current DSS Director has confirmed with the CSA Coordinator that all documentation requested by the CSA Coordinator will be provided promptly. The CSA Coordinator will not proceed with payment until all required documentation has been provided.
2. The CPMT agrees with the observation that CSA funds were applied to a child who was approved as IV-E. The CSA Coordinator accepted a verbal report that the child was not IV-E and paid the costs prior to receiving the required documentation noting IV-E eligibility.
3. Both FAPT and CPMT have discussed potential candidates for a parent representative; however, this was not documented. An advertisement will be run in the local paper to recruit parent representatives for both Teams. Additionally, the CSA Coordinator will request to speak at a school event and PTA meeting. Local churches will be contacted and asked if they will put the information in their weekly bulletin. As soon as we have appropriate candidates they will be oriented to their respective Team.
4. At least annually, a thorough data analysis and outcome report will be provided to CPMT, with the goal of providing a summarized and updated version of the larger analysis on a quarterly basis."

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. 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 Cumberland 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 Hope Hodgson, CSA Coordinator during our on-site visit. Mrs. Hodgson's efforts enabled the audit staff to resolve quickly 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



Stephanie S. Bacote, CIGA  
Program Audit Manager

cc: Scott Reiner, Executive Director  
Don Unmussig, Acting County Administrator and  
CPMT Fiscal Agent  
Hope Hodgson, CSA Coordinator