



# COMMONWEALTH of VIRGINIA

## OFFICE OF CHILDREN'S SERVICES

*Administering the Children's Services Act*

Scott Reiner, M.S.  
Executive Director

August 9, 2018

Ms. Tisha Deegan, CPMT Chair  
Fairfax-Falls Church CSA Program  
12000 Government Center Parkway, Suite 552  
Fairfax, VA 22035

RE: Fairfax-Falls Church Children's Services Act (CSA) Program Audit Self-Assessment  
Validation, File No. 39-2018

Dear Ms. Deegan,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2018, the Fairfax-Falls Church 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 May 31, 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 Fairfax-Falls Church CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

with the conclusion reported by the Fairfax-Falls Church 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 Fairfax-Falls Church CSA. The explanation for our assessment results are as follows:

***The Fairfax-Falls Church 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 and related established policies is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth Specifics pertaining to the Fairfax-Falls Church CSA Program are detailed on page two (2).***

**SIGNIFICANT NON-COMPLIANCE OBSERVATION**

Community-based behavioral health services (Mental Health Support Services) were funded for a non-Medicaid eligible youth wherein local practice did not comply with established CSA policy as follows:

1. Documentation of an assessment was not maintained that included the signature and written approval of a licensed mental health professional (with their stated credentials).
2. As an alternative, Fairfax-Falls Church representatives did not opt to purchase an independent clinical assessment.
3. The CPMT did not formally request (in writing) an exception to this policy through OCS predicated on exceptional circumstances that would warrant an exception.

Per CSA Policy, state pool funds expended for community-based behavioral health services that do not comply with the established criteria shall be subject to denial of funds. Fairfax-Falls Church CSA expended a total of \$1,425.

Client	FY	Service	Questioned Costs*
ICC-7	2017	Mental Health Support Services	\$1,425
		State Share	\$1,096
*Based on figures reported in client payment history			

Criteria: COV [§ 2.2-5206 Item 6, Policy Manual for the Children’s Services Act, Section 6.3 Community Based Behavioral Health Services](#)

**RECOMMENDATIONS**

1. The Fairfax-Falls Church CPMT should take appropriate action to ensure that non-compliance observations are addressed. Prior to funding authorization, the CPMT should ensure that required assessments have been completed and signed (where applicable) by authorized persons and/or required waivers have been granted. The Fairfax County CSA Office should maintain required documentation in the individual client records to evidence compliance requirements have been met.
2. The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, including whether the CPMT agrees with the observation regarding questioned costs. Upon review and recommendation 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**

“Thank you for your detailed report. The self-assessment process was enlightening and important as we move toward excellence in our CSA Program. We concur with the findings in the Report. Dr. Bessmer and staff will be completing our Quality Improvement Plan as requested.”

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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.

We would like to thank the Fairfax-Falls Church CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the assistance and cooperation that was provided by Janet Bessmer, Ph.D, CSA Manager during our on-site visit. Ms. Bessmer'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  
Bryan Hill, Fairfax County Executive  
David Hodgkins, Acting Fairfax City Manager  
Wyatt Shields, Falls Church City Manager  
Deirdre Finneran, CPMT Fiscal Agent  
Janet Bessmer, Ph.D., CSA Manager