



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

October 31, 2016

Catherine M. Heritage, CPMT Chair  
Deputy County Administrator  
County Administration  
10 Hotel Street Suite 204  
Warrenton, VA 20186

RE: Fauquier County CSA Program Self-Assessment Validation, File No. 25-2014

Dear Ms. Heritage,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2013-2015, the Fauquier 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 by the established due date of November 30, 2013. An on-site visit was scheduled and conducted by OCS Program Auditors on March 30, 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 Fauquier County CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

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

***The Fauquier County Community Policy and Management Team 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 a deficiency indicating an internal control weakness in the local CSA program. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affecting CSA funded activities, as well as monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organization's internal control structure are considered significant. Specifics pertaining to the Fauquier County CSA Program are detailed on page 2.***

**SIGNIFICANT INTERNAL CONTROL WEAKNESSES**

The Fauquier County CPMT has adopted and documented policies and procedures are not consistent with CSA statutes regarding referrals to the Family Assessment and Planning Team (FAPT) and fiscal responsibility for identified services. Section K of the Fauquier County CSA FAPT policies and procedures manual states:

“CPMT authorizes up to \$2,000 per funding request for low-level services that are court ordered or necessary for the safety and well-being of children in foster care or in prevention of foster care cases. These requests are exempt from the FAPT process and are commonly known as Non-FAPT funding requests. Examples are as follows:

1. Drug screening
2. Camps
3. Interpreter
4. Anger Management Classes
5. Parenting classes
6. Court testimony
7. Short-term medical insurance (out of state travel)
8. Family foster care special needs payment”

The adoption of this local policy/procedure circumvents CSA statutes that exempt from the FAPT only cases involving the payments of foster care maintenance, which shall be at the discretion of the CPMT. The list of services identified do not meet the criteria of foster care maintenance as defined in the Virginia Department of Social Services (VDSS) Foster Care Manual, and thus are not eligible for FAPT exemption. Moreover a service (e.g. court testimony) may be within the scope of responsibility of another agency and are not eligible for CSA funding.

As a result of the implementation of the local policy, standard FAPT referral procedures were not practiced that led to incomplete documentation of service planning activities and reimbursements for expenditures that would not otherwise be eligible for CSA funding because they were developed outside the FAPT process. The table below documents these exceptions and the associated questioned cost.

Client ID	Description	Questioned Cost State Share
EA 906	<ul style="list-style-type: none"> <li>• Mentoring Services; IFSP did not include client/family strengths</li> </ul>	\$1,120.36
RT 755	<ul style="list-style-type: none"> <li>• Mentoring services</li> <li>• Utilization review activities not evidenced</li> </ul>	\$1,098.39
SH 608	<ul style="list-style-type: none"> <li>• IFSP did not include client/family strengths</li> </ul>	
	<b>Total</b>	<b>\$2,218.75</b>

**CRITERIA:** § 2.2-5209. Referrals to family assessment and planning team or collaborative, multidisciplinary team process, § 2.2-5211 State pool of funds for community policy and management teams section D; VDSS Foster Care Manual Section E 1.2

**RECOMMENDATION**

Upon notification that the above policy and procedure did not align with CSA policies established by the Code of Virginia and the State Executive Council, the CPMT took corrective action to clarify local policies and procedures. OCS Finance Office will review the actions taken by CPMT to address whether the funds will be 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 Fauquier CPMT concurs with the finding. We acknowledged during the completion of our self-assessment workbook that the above policy and procedure did not align with CSA policies established by the Code of Virginia and as such the Fauquier CPMT took immediate corrective action to change the policy. The services in question were provided to the families and reimbursement for those services provided in FY13 could impact meeting the needs of current families receiving services in Fauquier county in 2016."

The CPMT has submitted a complete and satisfactory quality improvement plan (QIP) addressing the observations identified by the team with the submission of the self-assessment workbook. OCS Program Auditors conducted a follow-up of the QIP to determine the status of all tasks. The CPMT is still working on completing the QIP and had provided target dates of completion. OCS asks 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 Fauquier 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 Erika Visnevskaja, CSA Coordinator during our on-site visit. Ms. Visnevskaja'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  
Paul S. McCulla, Fauquier County Administrator  
Azita Fetterer, Fiscal Agent  
Erika Visnevskaja, CSA Coordinator  
Stephanie S. Bacote, Audit Manager  
SEC Finance and Audit Committee