



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 23, 2018

Mr. Michael S. Hash, CPMT Chair
Grayson County Board of Supervisors
9075 Carsonville Road
Independence, VA 24348

RE: Grayson County CSA Program Self-Assessment Validation, File No. 33-2018

Dear Mr. Hash:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2018, the Grayson 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 27, 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 Grayson County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Grayson County CPMT concluded that no significant non-compliance observations and/or internal control weaknesses were noted. However, 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.

SIGNIFICANT NON-COMPLIANCE REPEAT OBSERVATIONS

1. 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 setting, 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: Code of Virginia (COV) 2.2-5206

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

2. The Parent Representative serving on the Community Policy and Management Team (CPMT) did not complete the Statement of Economic Interest (SOEI) form as required by statute. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds may be reduced based on the increased possibility that required parties may not have appropriately disclosed personal interests.

CRITERIA: (COV) 2.2-5205; Grayson County CPMT Policy Manual

RECOMMENDATIONS

1. The CPMT should periodically review local and statewide data provided in OCS management reports located on the CSA website specifically, but not limited to:
 - a. [CSA Performance Measures for FY 2016 and FY 2017](#) (web link)
 - b. [CSA Pool Expenditure Report](#) (web link)
 - c. [CSA Utilization Reports](#) (web link)
 - d. [OCS Reports to the General Assembly](#)
(web link: <http://www.csa.virginia.gov/publications/index.cfm>)
2. The CPMT should ensure that the Statement of Economic Interest Form is completed immediately for all required participating members serving on the CPMT

CLIENT COMMENTS

1. “The Grayson County CPMT Board will review quarterly statewide and local statistical information from the OCS website along with the financial data. The data will be used to monitor activities and assess the effectiveness of services purchased.”

2. "The Grayson County CPMT Board will ensure that all required members will complete the Statement of Economic Interest Form as required by state statute."

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 Grayson 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 Ms. Jennifer Snow, CSA Coordinator, during our on-site visit. Ms. Snow'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,



Rendell R. Briggs, CAMS
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
William Shepley, Grayson County Administrator
Jennifer Snow, CSA Coordinator
Kathy Cater, CPMT Fiscal Agent
SEC Finance and Audit Committee