



COMMONWEALTH of VIRGINIA

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

Scott Reiner, M.S.
Executive Director

March 16, 2017

James E. Howard, CPMT Chair
Greene County CSA Program
10009 Spotswood Trail
Stanardsville, VA 22973

RE: Greene County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 39-2015

Dear Mr. Howard,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the Greene County 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 June 29, 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 Greene County CSA program, our independent validation:

Concurs

Partially Concurs

Does Not Concur

with the conclusion reported by the Greene County CPMT that no significant internal observations of non-compliance or internal control weaknesses were identified in the design or operation of the processes or services conducted on behalf of Greene County CSA. The Greene County CPMT has submitted a complete and satisfactory quality improvement plan addressing all significant observations that were identified by the CPMT, which included tasks, responsible parties, and target completion dates. However, an additional action step is warranted to fully address the following non-compliance observation shown on page two that was identified by the Greene County CPMT:

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Four (4) case files were examined to confirm that required documentation was maintained to evidence referrals were assessed by the Family Assessment and Planning Team (FAPT) and that funding was authorized by the CPMT. Specifically, one of the four cases did not contain complete documentation to support all services funded. The missing documentation included the Child and Adolescent Needs and Strengths (CANS) assessment. Access to state pool funds requires use of the mandatory uniform assessment instrument. The CANS is the assessment instrument authorized by the State Executive Council. The corrective action plan submitted by the Greene County CPMT did not indicate a locally initiated reimbursement to CSA for funds expended where CSA requirements were not met. The state share of CSA costs incurred for those services was \$3,306.

Criteria: COV [§ 2.2-5212](#), CSA Policy Manual Section 3.6, [CANS Frequency of Administration - Updated 2013](#)

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|------------------------|------------------------------------------------------------------------------------------------------------------------|
| RECOMMENDATIONS | The CPMT should consult with OCS on the appropriate action to be taken where CSA funds were not appropriately expended |
| CLIENT COMMENT | See Attachment |

The Office of Children's Services respectfully requests that you submit a quality improvement plan addressing the observations detailed 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 Greene County 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 Amanda Long, CSA Coordinator during our on-site visit. Ms. Long'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
John Barkley, Greene County Administrator
Tracy Morris, CPMT Fiscal Agent
Amanda Long, CSA Coordinator
SEC Finance and Audit Committee

ATTACHMENT

**Greene County CPMT
Response to Significant Issue #1
Self-Assessment Audit FY 2013-15
March 15, 2017**

The case cited for non-compliance was non-mandated and brought to FAPT on December 4, 2013 by a new member of the team that was not yet CANS certified. In that the child was before the court and determined to be a child in need of services and at-risk for purchased placement, and requiring the coordination of two member agencies the child was deemed eligible for state pool funding. In an effort to ensure the child receive appropriate services the FAPT recommended an assessment and diagnostic evaluation to better determine a course of treatment services with the understanding the worker that brought the case would become CANS certified and conduct a CANS assessment prior to authorizing the recommended evaluation. The child was placed on a waiting list for an evaluation for March 2014 and in the interim CANS was not conducted by the time the provider sought authorization for the evaluation which was subsequently approved by the worker. The Greene CSA Coordinator in conjunction with the DSS Director determined payment for the evaluation should be made despite the absence of the CANS which could not be corrected because the worker had resigned his position with the agency.

In response to this and other identified issues, Greene County CPMT commenced an update to its policies and procedures. On February 11, 2015, Chapter 3 was approved by the Greene CPMT which includes the following section:

3.5 FAPT Staffing Procedures

To schedule a FAPT staffing, contact the CSA Coordinator. The following information should be included in the request.

3.5.1 Initial (the case does not have an active Greene IFSP):

1. Confirmation of signed release of confidential information form.
2. Youth's name
3. Parent/Guardian name
4. Parent/Guardian address
5. Amount of time needed
6. Names and relationship of anyone else attending (if no-one else is attending please indicate this as well)

3.5.2 Review (the case has an active Greene IFSP):

1. Confirmation of signed release of confidential information form
2. Youth's name
3. Amount of time needed
4. Names and relationship of anyone else attending (if no-one else is attending please indicate this as well)

Case managers must submit the following to the CSA Coordinator by noon two days prior to FAPT:

- a complete IFSP;

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completed CANS; and,
a consent for the release of confidential information form signed by a parent or guardian
or youth if over 18 years old

Given the circumstances that resulted in the non-compliance, the needs of the child, and the departure of the worker along with the implementation of a clarified policy that corrected the non-compliance, Greene County CPMT should not be required to reimburse the state portion of the expenditure.