



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

May 11, 2020

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. 25-2020

Dear Mr. Howard,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2020, 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 February 19, 2020 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:

Concur

Partially Concur

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 explanations for our assessment results are as follows:

The Greene County 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 with the statutory requirements of CSA. This is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Greene County CSA Program are detailed on page two.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

Five client case files were examined to validate conclusions reported by the Greene County CPMT. At least one exception was noted in four (80%) of five cases examined. The results of that review indicate improvement is needed in the pertaining to documentation of service planning activities and disbursement of CSA pool funds that did not meet compliance requirements of CSA. Exceptions as noted in the table below are deemed significant, as they are critical to evidencing compliance with CSA service planning and funding requirements.

Client File Review Exception Summary and Detailed Cost Breakdown					
Exception Rate	Description				
60% (2 of 3) Eligible Cases	1. Parental copay assessments were not documented; no applicable fiscal impact. Criteria: COV 2.2-5206 and 2.2-5208.				
40% (2 of 5)	2. "Reassessment" version of Child and Adolescent Needs and Strengths (CANS) assessment was used in lieu of the "Comprehensive" version for the initial and discharge assessments; no applicable fiscal impact. Criteria: CSA Policy 3.6 Mandatory Uniform Assessment Instrument.				
20% (1 of 5)	3. Expenditure not eligible for CSA funding because it was within the scope of responsibility of another agency (Social Services). Criteria: COV 2.2-5211				
Client #s	Exception	Service Description	Period	Total	State Share
D and M	1	All Services	10/2018 – 9/2019	\$0	\$0
B and M	2	All Services	10/2018 – 9/2019	\$0	\$0
H	3	Birth Certificate	6/2019	\$12	\$
				\$12	\$9.92

RECOMMENDATIONS

1. Prior to service planning, the CSA Coordinator and the FAPT should ensure that minimum documentation requirements are met and correspondence is maintained in the client case file or readily accessible to substantiate services recommended and funded met CSA compliance criteria, to include:
 - A. assessment of parental ability to contribute financially to the cost of services (copay).
 - B. documenting appropriate versions of mandatory assessments (CANS) .
2. Someone other than the CSA Coordinator should perform periodic case reviews to establish quality control of client records and to ensure compliance with CSA policy and statutory requirements. As a component of the quality control process, the CPMT should consider incorporating use of the [CSA Documentation Inventory](#), which is available on the CSA website.

RECOMMENDATIONS CONTINUED

3. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding and use of alternate funding sources where eligible and appropriate.
4. 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 of \$9.92 (state share) expended for the purchase of a birth certificate. 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.

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 task 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 Valerie Payton, CSA Coordinator during our on-site visit. Ms. Payton'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
Mark B. Taylor, Greene County Administrator
Tracy Morris, CPMT Fiscal Agent
Valerie Payton, CSA Coordinator