



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

July 1, 2019

Ms. Anne Mitchell, CPMT Chair
King William County CSA Program
P. O. Box 187
King William, VA 23086

RE: King William County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 40-2019

Dear Ms. Mitchell,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the King William 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 April 19, 2019 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 King William County CSA program, our independent validation:

Concur Partially Concur Does Not Concur

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

The King William 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 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 King William County CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATION

The King William County CSA Program requested \$1,534.26 and was reimbursed \$1,238.76 (state share) in fiscal year 2019 for expenditures incurred on behalf of one client that did not meet compliance requirements of CSA. Therapeutic Day Treatment Summer Camp Services were funded from June 2018 to August 2018 for a Medicaid eligible youth. Children's Services Act Policy Manual Section 4.4.2, Restrictions on Pool Fund Usage/Medicaid Funded Services states, "Community Policy and Management Teams shall use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under the Children's Services Act. Effective July 1, 2009, pool funds shall not be spent for any service that can be funded through Medicaid for Medicaid-eligible children and youth except when Medicaid-funded services are unavailable or inappropriate for meeting the needs of a child." (Statutory Authority: 2011 Appropriation Act, Chapter 890, Item 274 E.)

RECOMMENDATIONS

1. Prior to approving expenditures for payment, the CSA Office should ensure that the proposed expenditure meets the criteria for CSA funding, including exploring the availability of all alternate funding sources.
2. 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. 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 COMMENTS

"The King William County CSA Program agrees that CSA funds were inappropriately used for Therapeutic Day Treatment Summer Camp Services expenditures for a Medicaid-eligible child. The KWC CPMT is submitting a Quality Improvement Plan to address this non-compliance."

The King William County CPMT has submitted a quality improvement plan as requested by the Office of Children's Services. 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.

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We would like to thank the King William County CPMT 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 provided by Ann Porter, CSA Coordinator during our on-site visit. Their 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
Bobbie Tassinari, King William County Administrator
Olivia Schools, CPMT Fiscal Agent
Ann Porter, CSA Coordinator