



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

August 5, 2019

Ms. Jackie Clayton
CPMT Chair and Fiscal Agent
Northumberland County CSA Program
P. O. Box 399
Heathsville, VA 24473

RE: Northumberland County Children's Services Act (CSA) Program Audit
Self-Assessment Validation, File No. 49-2019

Dear Ms. Clayton,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2019, the Northumberland 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 4, 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 Northumberland County CSA program, our independent validation:

Concur . Partially Concur Does Not Concur

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

The Northumberland 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 Northumberland County CSA Program are detailed on page two.

SIGNIFICANT NON-COMPLIANCE – REPEAT OBSERVATION

The CPMT utilization management activity did not meet the minimum criteria set forth in COV § 2.2-5206. While evidence supported a review of fiscal data, CPMT monthly meeting minutes and accompanying reports did not evidence utilization management/utilization review (UM/UR) activities to include:

- A. review of local and statewide data provided in the management reports demographics, types of services provided, duration of services, 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, relatives homes, family-like setting, or their community.

The non-compliance observation referenced in this report was also identified in the prior audit report issued March 7, 2017. The Northumberland County CPMT submitted a quality improvement plan with March 31, 2017 as the target date for completion. The CPMT, as the governing body, is responsible for on-going monitoring of the QIP to ensure timely implementation of the plan and that the actions taken are continuously working as intended.

RECOMMENDATIONS

The Northumberland County CPMT should immediately initiate and going forward periodically review OCS financial and performance reports depicting local and statewide data as required by CSA statute to demonstrate compliance. Tools to effect a continuous quality improvement process (i.e utilization management) are available on the CSA website and listed below for your convenience.

- [CQI Dashboard](#)
 - [CQI Dashboard Instructions Manual](#)
- [CQI Dashboard Codes](#)
- [CQI Documentation Template with Instructions \(Download\)](#)
- [CQI Terms and Definitions](#)
- [CQI Training](#)

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.

Ms. Jackie Clayton, CPMT Chair

August 5, 2019

Page 2

We would like to thank the Northumberland 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 Jerry Allison, CSA Coordinator during our on-site visit. Ms. Allison'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
E. Lutrell Tadlock, Northumberland County Administrator
Jerry Allison, CSA Coordinator