



# COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.  
Executive Director

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

March 14, 2019

Ms. Glenda Collins, CPMT Chair  
City of Norton, CSA Program  
P.O. Box 568  
Big Stone Gap, VA 24219

RE: City of Norton CSA Program Self-Assessment Validation, File No. 26-2019

Dear Ms. Collins:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2019, the City of Norton Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Services Act (CSA) Program. An on-site visit was scheduled and conducted by OCS Program Auditors on January 10, 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 City of Norton CSA program, our independent validation:

Concurs                       Partially Concurs                       Does Not Concur

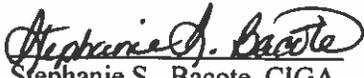
with the conclusion reported by the City of Norton CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of the City of Norton CSA program. The explanation for our assessment results are as follows:

***The City of Norton CPMT concluded that there were only non-significant compliance observations and/or internal control weaknesses 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 City of Norton CSA Program are detailed on page two (2).***

<b>SIGNIFICANT NON-COMPLIANCE OBSERVATIONS</b>
Non-Public members serving on the City of Norton Family Assessment and Planning Team (FAPT) did not complete the Statement of Economic Interest (SOEI) form as required by COV 2.2-5207. Required forms were not completed by the private provider and community representatives servicing on the FAPT. The effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds are significantly reduced based on the increased possibility that required parties may not have appropriately disclosed personal interests. As of the time of this report, the required form was obtained for one of the two applicable FAPT representatives.
<b>CRITERIA:</b> Code of Virginia (COV) 2.2-5207; and 2.2-3115
<b>RECOMMENDATIONS</b>
The CPMT should ensure that the SOEI form is completed immediately for all non-public participating members serving on the CPMT/FAPT. Forms should be retained in accordance with records retention policies.
<b>CLIENT COMMENTS</b>
“Statement of Economic Interest form was not completed on all non-public members. As of this date, Norton City CSA has addressed the issue and has practices in place prevent this again. Norton Community Policy and Management Board and CSA Coordinator will ensure SOEI forms are completed on every non-public member of both Family Assessment and Planning Team and Community Policy and Management Board.”

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 City of Norton 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. Vicki Hall, CSA Coordinator, during our on-site visit. Their efforts enabled the audit staff to quickly resolve any questions and concerns 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  
Fred L. Ramey, Jr., City Manager  
Barbara A. Muir, CPMT Fiscal Agent  
City of Norton Treasurer  
Vicki Hall, CSA Coordinator