

***CHILDREN'S SERVICES ACT
PROGRAM AUDIT***

***Prince Edward County
Self-Assessment Validation***

Final Audit Report No. 19-2022

August 25, 2022



Office of Children's Services
Empowering communities to serve youth

Report Disclaimer

Due to the COVID-19 pandemic, onsite visits to validate management's conclusions have been suspended until further notice. In lieu of onsite visits, self-assessment validation activities were conducted remotely.



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 25, 2022

Douglas Stanley, CPMT Chair and County Administrator
Prince Edward County
PO Box 382
Farmville, VA 23901

RE: Prince Edward County CSA Program Self-Assessment Validation
Final Report, File No. 19-2022

Dear Mr. Stanley,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2022, the Prince Edward Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Prince Edward County CSA program on February 4, 2022 and covering the period July 1, 2020 through June 30, 2021, our independent validation:

Concur

Partially Concur

Does Not Concur

with the conclusion reported by the Prince Edward County 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 Prince Edward County CSA Program. The explanations for our assessment results are as follows:

The Prince Edward County CPMT concluded that there were no significant compliance and/or internal control weakness observations noted. However, validation procedures identified deficiencies indicating non-compliance in the local CSA program not identified by the CPMT. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics are detailed on pages 2-4.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS- REPEAT

1. Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State and local CSA policies and procedures were not met as follows:

A. Per Code of Virginia (COV) § 2.2-5212, access to the state pool of funds includes the use of a uniform assessment instrument and process. The Child and Adolescent Needs and Strengths (CANS) Assessment is the approved uniform assessment instrument per CSA Policy 3.6 Mandatory Uniform Assessment Instrument (Adopted December 18, 2007, Revised December 13, 2018). CSA Policy states that the CANS assessment is required initially, annually, and upon discharge from the CSA process. An annual CANS had not been completed timely for one (1) client case file examined, resulting in \$4,315.15 in questioned costs, of which \$3,352.01 represents the state share. Refer to client A in the table below.

B. CSA pool funds were expended for community-based services that were not documented in an Individual and Family Services Plan (IFSP) approved by the Family Assessment and Planning Team (FAPT). The CSA office purchased case support services from the Community Services Board (CSB) to provide basic case oversight for a client that is not open to another public child-serving agency. This resulted in questioned cost \$3,265.00 of which \$2,900.63 represents the state share. Refer to client B in the table below.

Client	Period of Service	Total Expenditures	State Share
A	September 2020 – March 2021	\$4,315.15	\$3,352.01
B	September 2020 – May 2021	\$3,265.00	\$2,900.63
Total		\$7,580.15	\$6,252.64

RECOMMENDATIONS

1. Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding and/or other appropriate funding sources. Adequate documentation, such as but not limited to, the completion of annual CANS assessment and services documented in the IFSP should be maintained as justification for CPMT funding decisions.
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.
3. The CPMT should ensure that the SOEI forms are completed upon the appointment of all non-public participating members serving on the CPMT and FAPT. Completed forms should be filed with the clerk of the local governing body, per the guidance provided in OCS Administrative Memo #18-02 January 2018.

CLIENT COMMENTS

“Client A: Although it is understood that a CANS is required at a minimum initially, annually and at discharge, this youth was part of the Fostering Futures program and ineligible for Title IV-E. Several issues prevented the case manager to complete the CANS within a year after the previous CANS, including the start of the COVID pandemic, case managers moving to mostly telework, and a change in the case manager, Supervisor and Director, causing the agency to not complete the CANS timely. On 5/18/2021, the CSA Coordinator implemented a spreadsheet, which is provided to FAPT and CPMT agency members that shows the case name, consent expiration date, CANS due date, date of last IEP, next FAPT meeting date, and miscellaneous notes that are important to the case. The CSA Coordinator is now using the IFSP template as recommended by OCS, which will ensure all required information is documented prior to CPMT funding approval.

Client B: The CSA Coordinator made a mistake in not recording the recommendation of the FAPT to provide case management services from the CSB on the IFSP form.”

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

2. CPMT and FAPT membership does not meet requirements as established by COV [§ 2.2-5205](#) and [§ 2.2-5207](#). The composition of the CPMT does not include a private provider representative, and the CPMT’s parent representative did not actively participate during the review period. In addition, the FAPT does not have a parent representative. However, a private provider actively served on the FAPT. The private provider role on CPMT is mandatory, whereas the role is optional on FAPT. The CPMT meeting minutes for the period of review do not document any recruitment efforts to secure a private provider or a parent representative to serve on their teams. The absence of the private provider representative and the parent representatives could potentially impede the achievement of the highest degree of multi-disciplinary collaboration, leveraging public-private partnerships and ensuring family advocacy. Prior to the issuance of this report, CPMT secured a private provider representative.
3. The FAPT private provider representative did not abstain from voting on a service plan when the organization they represent was recommended to provide direct services to a client. COV [§ 2.2-5207](#) states: “Persons serving on the team who represent private organizations or associations of providers for children's or family services shall abstain from decision-making involving individual cases or agencies in which they have either a personal interest, as defined in [§ 2.2-3101](#) of the State and Local Government Conflict of Interests Act, or a fiduciary interest.” The exception was observed in one of the six client records reviewed.

RECOMMENDATIONS

1. The CPMT should ensure that all required positions on the CPMT and FAPT are filled. The CPMT should actively and continuously perform recruitment activities when vacancies occur. In addition, the CPMT should document its recruitment efforts in the CPMT meeting minutes.
2. Persons serving on the CPMT or FAPT teams who represent private organizations or associations of providers for children's or family services shall abstain from decision-making involving individual cases or agencies in which they have either a personal interest.

CLIENT COMMENTS

"An ad has been placed in the Farmville Herald and the County's webpage for a parent representative for both the FAPT and CPMT (please see attached). The CPMT discussed this issue at the August 2022 meeting and it was documented that we currently have an ad out. CPMT will continue recruiting efforts for a parent representative for both the FAPT and CPMT and document those efforts in the CPMT meeting minutes.

Minutes of the FAPT meeting will reflect that the private provider abstained from voting in cases referred to his company."

The Office of Children's Services respectfully requests that you submit a quality improvement plan (QIP) to address the observation outlined in this report no later than 30 days from receipt of this report. We ask that you notify this office as QIP tasks identified to address significant observations 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 Prince Edward County Community Policy and Management Team and CSA staff and partners for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation provided by Cheryl Stimpson, CSA Coordinator during our review. Ms. Stimpson'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,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Crystal Baker, CPMT Fiscal Agent
Cheryl Stimpson, CSA Coordinator