



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

March 14, 2019

Mr. Guy Smith, CPMT Chair
Pulaski County CSA Program
53 Commerce Street
Pulaski, VA 24301

RE: Pulaski County CSA Program Self-Assessment Validation, File No. 21-2019

Dear Mr. Smith:

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2019, the Pulaski County 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 9, 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 Pulaski County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

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

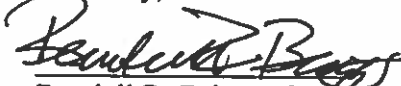
The Pulaski County CPMT concluded that there were only non-significant compliance observations and/or internal control weaknesses noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified a deficiency indicating non-compliance with the statutory requirements 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 Pulaski County CSA Program are detailed on page two (2).

SIGNIFICANT NON-COMPLIANCE OBSERVATION
The Pulaski County CPMT has not established and documented a policy governing the provisions of Intensive Care Coordination Services (ICC). Code of Virginia (COV) 2.2-5206, item #17 creates a duty of the CPMT to “Establish policies for providing intensive care coordination services for children who are at risk of entering, or are placed in, residential care through the Children’s Services Act program, consistent with guidelines developed pursuant to subdivision D 22 of 2.2-2648”. It should be noted that Pulaski County CPMT did not authorize funding of any ICC services during the audit period of review.
RECOMMENDATIONS
The CPMT should immediately establish and document policies governing the provisions of ICC services.
CLIENT COMMENTS
“We agree with the draft report. The Non-Compliance Observation listed in the report was included in our Workbook Quality Improvement Plan previously submitted. Create ICC Policy with target date 10/31/19”

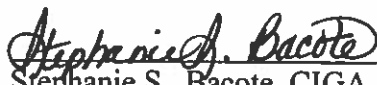
The CPMT has submitted a satisfactory quality improvement plan addressing all observations, which included tasks, responsible parties, and target completion dates. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Pulaski County 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 both CSA Coordinators: Kim Williams and Heather Haywood, 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
Jonathan Sweet, Pulaski County Administrator
Melinda L Worrell, CPMT Fiscal Agent
Pulaski County Treasurer
Kim Williams, CSA Coordinator
Heather Haywood, CSA Coordinator