

**SELF-ASSESSMENT WORKBOOK**

**FOR**

**LOCALLY ADMINISTERED CSA PROGRAMS**

The Office of Children’s Services (OCS) serves as the administrative entity that ensures the implementation of the decisions of the State Executive Council (SEC) for Children’s Services for the CSA. In accordance with the Code of Virginia (COV) [§ 2.2-2649](http://law.lis.virginia.gov/vacode/title2.2/chapter26/section2.2-2649/) Item B3, OCS is required to develop and provide for the consistent oversight for program administration and compliance with state policies and procedures. Likewise, COV [§ 2.2-5206](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5206/) Item 6 requires the local Community Policy and Management Team to establish quality assurance and accountability procedures for program utilization and funds management. This self-assessment workbook is designed to facilitate OCS and locally administered CSA program efforts to ensure that the objectives of the Children’s Services Act are achieved, and the policies adopted by the SEC are implemented accordingly. The organization of the workbook is structured in a manner that allows local programs to assess and effect local best practices and control processes for mitigating potential risks (sections I through IV), compliance (section V), and quality improvements (section VI). As such, the self-assessment workbook has been adopted to support the OCS continuous quality improvement program, including program audits, technical assistance, and training.

**Vision, Mission, and Values**

OCS envisions CSA as a collaborative, child-centered, family-focused, community-based system of care that effectively meets the needs of youth and their families in the Commonwealth.

We strive to empower communities to serve youth. OCS values:

* **System of Care:** Promote policies, uniform guidelines, services and practices that support systems of care in communities that can be tailored to meet the unique strengths, resources, and needs of youth, families, and communities.
* **Child-Centered Family Focused:** Promote working in partnership with families to ensure that the assessment, design, delivery, and management of service is family-driven.
* **Continuum of Care:** Provide access to a continuum of assessment, early intervention, treatment, and transition services and supports in communities.
* **Integrate Services across Agencies:** Integrate services and funding for youth and their families with designated care management to ensure multiple services are coordinated across agencies and evolve over time to meet the changing strengths and needs of children and their families.
* **Collaboration:** Support open communication, active participation, and collaboration among CSA stakeholders across all sectors and at all levels on program and fiscal policy development and service development, delivery, and management.
* **Fiscal Accountability:** Ensure fiscal accountability in that funds are spent effectively, efficiently, and equitably, maximizing the use of all local, state, federal and private funding streams.
* **Inclusive Excellence:** Foster a culture of inclusion, diversity, equity, and mutual respect for all Virginians.

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**SECTION I: GOVERNANCE**

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**SECTION I: GOVERNANCE**

**ORGANIZATIONAL STRUCTURE WORKSHEET**

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| Organizational structure provides the structure to plan, execute, control, and monitor activities. A sound organizational structure defines key areas of authority and responsibility, while illustrating reporting lines. Assignment of authority and responsibility involves the degree to which individuals and teams are authorized and encouraged to use initiative to accomplish objectives and solve problems. It includes establishing reporting relationships, fixing authorization procedures, issuing policy that assigns appropriate personnel to each program, and allocating resources to do each job.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf) | | | | | |
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| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
|  |  | Y | N | N/A | Comments |
| 1. Document and maintain a current organizational chart of the locally administered CSA structure. |  |  |  |  |  |
| 1. Maintain documentation which identifies locally administered CSA staff to include, but not limited to:  * CPMT Members * FAPT Members * MDT Members * CSA Coordinators * UM/UR Reviewer |  |  |  |  |  |
| 1. Maintain documentation identifying the affiliations, dates of tenure, and roles (e.g.*, chair, fiscal agent, etc.)* of locally administered CSA staff. |  |  |  |  |  |
| 1. Maintain documentation to describe the duties and responsibilities of key staff *(i.e. CSA Coordinator, CPMT Chair, FAPT Chair, MDT Chair, Fiscal Agent, UM Reviewer)* responsible for locally administered CSA programs. |  |  |  |  |  |
| 1. Ensure that membership of the CPMT, FAPT, and MDT is balanced appropriately among the representatives required to serve on the team per [§ 2.2-5205](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5205/) and [§ 2.2-5207](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5207/). |  |  |  |  |  |

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**SECTION I: GOVERNANCE**

**MANAGEMENT PHILOSOPHY WORKSHEET**

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| Management philosophy is the set of shared beliefs and attitudes characterizing how the agency handles everything it does, from developing and implementing strategy to day-to-day activities. This philosophy reflects the agency’s values, influencing its culture and operating style, and affects how well fiscal programs can implement, maintain, and enforce control. Management philosophy appears in policy statements, oral and written communications, and decision-making. Management reinforces the philosophy more with everyday actions than with its words.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf) | | | | | |
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| Y | N | N/A | Comments |
| 1. Document the local program’s mission, vision, values, goals, and objectives. |  |  |  |  |  |
| 1. Document a Code of Ethics or adopt policies established by the local governing authority. The document should be publicly accessible. |  |  |  |  |  |
| 1. Ensure Statement of Economic Interest Forms are filed by February 1 for applicable public officials serving as CPMT/FAPT members *(Note: Verify with the clerk of the local governing body).* |  |  |  |  |  |
| 1. Ensure the “long form” Statement of Economic Interest Form is filed with the clerk of the local governing body immediately upon appointment for all non-public officials serving as CPMT/FAPT members *(Refer to OCS Admin Memo #18-02* [*Statement of Economic Interest Filings for FAPT and CPMT Members*](https://www.csa.virginia.gov/content/doc/Administrative_Memo_18-02.pdf)). |  |  |  |  |  |
| 1. Verify and maintain confidentiality statements signed by CPMT, FAPT, MDT, and related parties *(Note: May include CPMT minutes evidencing closed session, attendance forms including confidentiality statements, FAPT minutes and/or service plans that include confidentiality statements, etc.).* |  |  |  |  |  |
| 1. Document and retain the schedule of CPMT, FAPT, and MDT meetings, including joint meetings. |  |  |  |  |  |
| 1. Maintain a central repository of CPMT communications, including but not limited to formal minutes. |  |  |  |  |  |

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**SECTION I: GOVERNANCE**

**POLICIES AND PROCEDURES WORKSHEET**

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| Policies and procedures are control activities established and implemented to provide reasonable assurance that potential risk exposures are addressed, and organizational objectives are effectively carried out. Control activities occur across an organization, at all levels, and in all functions. They include a range of activities such as authorization, review and approval, verification, reconciliation, physical security over assets and data, segregation of duties, education, training, coaching, and performance planning and evaluation.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf) | | | | | |
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| Y | N | N/A | Comments |
| 1. Document policies/procedures governing CPMT administrative activities *(e.g., bylaws)*. |  |  |  |  |  |
| 1. Document operating policies/ procedures governing program and fiscal activities *(e.g. policy/ procedure manual)*. |  |  |  |  |  |
| 1. Establish a process/frequency for review of all policies and procedures. |  |  |  |  |  |
| 1. Maintain evidence that policies/procedures are current and are reviewed in accordance with the established process *(e.g., policy review/revision log)*. |  |  |  |  |  |
| 1. Ensure that locally established policies/procedures are consistent with applicable statutes, laws, regulations, etc.; including updates of relevant citations *(e.g., Code of Virginia, Appropriation Act, VDOE regulations, DMAS/Medicaid policies, VDSS foster care policies, etc.)*. |  |  |  |  |  |
| 1. Ensure that locally established policies/procedures are consistent with the State Executive Council’s (SEC) Policy Manual for the Children’s Services Act *(e.g., CSA Policy Manual)*. |  |  |  |  |  |

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**SECTION I: GOVERNANCE**

**PROCESS NARRATIVE / FLOWCHART WORKSHEET**

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| Process flow analysis can be documented in narrative or diagram (a.k.a. flowchart) form to understand better the interrelationships among process inputs, tasks, outputs, and responsibilities. The entities and documents involved in the process must be identified in order to diagram it. A flowchart shows step-by-step progression through a procedure or system using connecting lines and a set of conventional symbols.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf) | | | | | |
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| Y | N | N/A | Comments |
| 1. Prepare a narrative or flowchart describing the process for review of referrals to FAPT. |  |  |  |  |  |
| 1. Prepare a narrative or flowchart describing the process for performing case-specific utilization reviews. |  |  |  |  |  |
| 1. Prepare a narrative or flowchart describing the process for purchasing and or contracting for services. |  |  |  |  |  |
| 1. Prepare a narrative or flowchart for CPMT approval of funding services recommended by FAPT. |  |  |  |  |  |
| 1. Prepare a narrative or flowchart for expenditure payment processing for CSA-funded services. |  |  |  |  |  |
| 1. Prepare a narrative or flowchart to describe the process for requesting additional supplements and monitoring expenditures and related reimbursements. |  |  |  |  |  |
| **Common Flowchart Symbols** |  | | | | |

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**SECTION I: GOVERNANCE**

**MONITORING WORKSHEET**

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| “Monitoring” is the process of assessing the presence, functioning, and continuous improvement of internal control components. Monitoring is accomplished through ongoing management activities, separate evaluations, or both. Examples of monitoring activities include:  • Managers reviewing operating reports.  • Internal auditors, external auditors, and advisors regularly provide recommendations.  • Training seminars, planning sessions, and other meetings to give feedback to management.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf) | | | | | |
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| Y | N | N/A | Comments |
| 1. Maintain documentation of local CSA staff participation in CSA-related training seminars, planning sessions, and other meetings (e.g., *participant rosters, sign-in/out sheets, certificates of completion, meeting minutes, etc.)*. |  |  |  |  |  |
| 1. Identify lists of monitoring (operational and financial) reports furnished to the FAPT, MDT, and/or CPMT, along with scheduled due dates. |  |  |  |  |  |
| 1. Demonstrate that monitoring reports were reviewed by the CPMT and published timely. |  |  |  |  |  |
| 1. Maintain a central repository of reports issued by internal and external auditors and other advisory resources (e.g., *annual audits of local government, VDSS IV-E Reviews, etc.).* |  |  |  |  |  |
| 1. Maintain a central repository of corrective action plans for CSA created in response to Task 4. |  |  |  |  |  |
| 1. Ensure that corrective action plans are implemented by the established due dates. |  |  |  |  |  |
| 1. Solicit and document feedback from local CSA program partners and stakeholders regarding the program's effectiveness *(e.g. parent/provider satisfaction surveys, public comment during CPMT meetings, etc.)*. |  |  |  |  |  |

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**SECTION I: GOVERNANCE**

**ORGANIZATIONAL LEVEL**

**INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

**Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](https://www.doa.virginia.gov/reference/ARMICS/ARMICS_Standards.pdf)

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| **GLOSSARY OF INTERNAL CONTROL TERMS** | |
| **Best Practice** | “Best practice” is a frequently used business term with many definitions. For the purposes of these standards, these definitions help to provide an understanding of this term from multiple perspectives:   * The winning strategies, approaches, and processes that produce superior performance in an organization*.* * An activity or procedure that has produced outstanding results in another situation and could be adapted to improve effectiveness, efficiency, ecology, and/or innovativeness in another situation. * A way or method of accomplishing a business function or process that is considered to be superior to all other known methods. *Source: www.qaproject.org/methods/resglossary.html* * The term best practice generally refers to the best possible way of doing something; it is commonly used in the fields of business management, software engineering, and medicine, and increasingly in government. *Source: en.wikipedia.org/wiki* |
| **Control Activities** | Policies and procedures established and implemented to help ensure the risk responses are effectively carried out. Control activities occur throughout an organization, at all levels, and in all functions. They include:   * Authorization * Review and approval * Verification * Reconciliation * Physical security over assets * Segregation of duties * Education, training, and coaching * Performance planning and evaluation |
| **Control Deficiencies** | Ineffective processes that may adversely impact the program’s ability to achieve desired strategic, financial, operational, reporting, compliance, and stewardship objectives. |
| **Control Environment** | The agency’s “corporate culture,” showing how much the agency’s leaders value ethical behavior and internal control. Factors include:   * Values stated and promoted for integrity and ethical behavior * Direct and active involvement of the agency management team * Commitment to competence * Organizational structure * Assignment of authority and responsibility * Human resource standards * Internal control philosophy * Risk management philosophy * Oversight by the Cabinet Secretary * Oversight by the agency’s governing board or commission (when applicable) |

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| **GLOSSARY OF INTERNAL CONTROL TERMS** | |
| **Information and Communication** | Communicating relevant information in a timeframe to enable people to carry out their responsibilities. Effective communication occurs down, across, and up the agency. An effective information and communication process ensures that all personnel receive a clear message from the agency head that internal control must be taken seriously. |
| **Inherent Risk** | The risk that one or more factors will prevent an objective from being accomplished, if the agency does not implement risk mitigation measures. |
| **Internal Control** | Ongoing process led by agency head to design and provide reasonable assurance that these types of objectives will be achieved:   * Effective and efficient operations * Reliable financial reporting * Compliance with applicable laws and regulations * Safeguarding of assets |
| **Internal Control Components** | * Control Environment * Risk Assessment * Control Activities * Information and Communication * Monitoring Activities |
| **Monitoring** | The process of assessing the presence and functioning of internal control components and making continuous improvements. Monitoring can be accomplished by routine management activities, separate evaluations, or both. |
| **Residual Risk** | The risk that remains after management responds to inherent risk. Once risk responses have been developed, management then considers residual risk. |
| **Responses to Risk** | The technique used to offset the impact of risk:  • Avoid risk  • Reduce risk  • Share risk  • Accept risk  A complete response to a given risk may include more than one technique. |
| **Risk** | A factor that could prevent an individual, group, or agency from accomplishing an objective as intended or planned. |
| **Risk Assessment** | Process of analyzing potential events and determining what impact they may have on achieving agency objectives. |

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| **ETHICS** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. The program’s Code of Ethics (COE) and other policies regarding acceptable business practice, conflicts of interest, and expected standards of ethical and moral behavior are comprehensive, relevant, and address matters of significance. |  |  |  |
| 1. Employees fully and clearly understand what behavior is acceptable/unacceptable under the program’s COE and know what to do when they encounter improper behavior. |  |  |  |
| 1. The CPMT frequently and clearly communicates the importance of integrity and ethical behavior during meetings, one-on-one discussions, training, and periodic written statements of compliance from key stakeholders. |  |  |  |
| 1. The CPMT and FAPT/MDT demonstrate a commitment to integrity and ethical behavior by example in their day-to-day activities. |  |  |  |
| 1. Local CSA staff are generally inclined to do the “right thing” when faced with pressures to cut corners with regard to policies and procedures. |  |  |  |
| 1. The CPMT addresses and resolves violations of behavioral and ethical standards consistently, timely, and equitably in accordance with the provision of the program’s COE. |  |  |  |
| 1. The existence of the program’s COE and the consequences of its breach are an effective deterrent to unethical behavior. |  |  |  |
| 1. The CPMT strictly prohibits circumvention of established policies and procedures, except where specific guidance has been provided, and demonstrates commitment to CSA principles. |  |  |  |
| 1. Performance targets are reasonable, realistic, and do not create undue pressure on achievement of short-term objectives. |  |  |  |
| 1. Ethics are woven into criteria used to evaluate local CSA individual or program performance. |  |  |  |
| 1. CPMT reacts appropriately when receiving unfavorable news from subordinates and divisions. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

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| **PROFESSIONAL AND TECHNICAL COMPETENCE** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. Job descriptions and other documents that define key position duties/requirements) are current, accurate, and understood. |  |  |  |
| 1. There is a process in place to keep job descriptions current, accurate, and understood. |  |  |  |
| 1. Job knowledge/skills requirements realistically match the CSA program and position’s needs. |  |  |  |
| 1. The CPMT and FAPT/MDT have the specialized knowledge, experience, and training required to perform their duties and do not rely extensively on technical specialists or outside consultants. |  |  |  |
| 1. Local CSA staff is properly trained and capable of performing assigned duties. |  |  |  |
| 1. Local CSA staff, partners, and stakeholders are committed to excellence in performing their jobs. |  |  |  |
| 1. Individual performance targets focus on both the long and short-term; and address a broad spectrum of criteria *(e.g. quality, productivity, leadership, teamwork, and self-development)*. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

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| **ORGANIZATIONAL STRUCTURE** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. The organizational structure of the local CSA program is appropriate to carry out its mission and manage its activities. |  |  |  |
| 1. The organizational structure of the local CSA program provides adequate supervisory and managerial oversight. |  |  |  |
| 1. The current organizational structure facilitates the flow of information up, down, and across the program to all partners and stakeholders. |  |  |  |
| 1. Reporting relationships provide the CPMT, FAPT, MDT, and CSA Coordinators with the information appropriate to their responsibility and authority. |  |  |  |
| 1. CSA Coordinators, FAPT, and MDT members have ready access to the CPMT in addressing significant issues. |  |  |  |
| 1. The CPMT periodically evaluates the organizational structure in light of changes in the scope, nature, or extent of operations. |  |  |  |
| 1. The program has the appropriate number of people and resources allocated to key functions/activities. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

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| **ASSIGNMENT OF AUTHORITY AND RESPONSIBILITY** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. The CPMT designates who is responsible for committing the local CSA program pool funds to financial or contractual obligations through a formal delegation of authority. |  |  |  |
| 1. Specific limits are established for certain types of transactions and delegations are clearly communicated and understood by local CSA program stakeholders. |  |  |  |
| 1. The CPMT accepts responsibility for information generated by the program and on reported results. |  |  |  |
| 1. The CPMT is appropriately empowered to correct problems and implement improvements. |  |  |  |
| 1. The current level of delegation of duties balances empowerment and “getting the job done” with CPMT involvement and authority. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

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| **RISK ASSESSMENT** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. Formal or informal process exists to inform the CPMT of events that may adversely affect the achievement of CSA objectives *(i.e., “risk”)*. |  |  |  |
| 1. The process used to analyze risk in the local CSA program is clearly understood, including estimating the significance of risk and assessing the likelihood of the risk event occurring. |  |  |  |
| 1. The process used to analyze risk in the local CSA program includes determining steps needed to mitigate risks. |  |  |  |
| 1. The CPMT assesses the impact on the local program if it does not take action to respond to emerging risks to the achievement of CSA objectives. |  |  |  |
| 1. Once the CPMT has determined that the risk can be mitigated, it determines whether an implementation plan is needed. |  |  |  |
| 1. If an implementation plan is needed, the CPMT establishes the necessary procedures to ensure the plan is carried out. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

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| **CONTROL ACTIVITIES FOR FISCAL PROCESSES** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. Appropriate policies and procedures have been developed and implemented for major CSA fiscal processes. |  |  |  |
| 1. Appropriate and timely actions are taken on exceptions to local CSA fiscal policies and procedures. |  |  |  |
| 1. Policies and procedures identify how fiscal processes are to be performed and monitored and who is responsible for carrying them out. |  |  |  |
| 1. Fiscal control activities *(approvals, authorizations, separation of duties, etc.)* described in policy and procedure manuals are applied the way they are intended to be used and clearly relate to designated risks. |  |  |  |
| 1. Fiscal controls are in place to provide reasonable assurance that CPMT decisions are appropriately carried out. |  |  |  |
| 1. CPMT personnel with appropriate responsibilities, organizational experience, and knowledge of the program’s affairs periodically review and document the functioning and overall effectiveness of fiscal controls. |  |  |  |
| 1. Appropriate criteria are established to evaluate fiscal controls. |  |  |  |
| 1. Fiscal responsibilities of the local administration of CSA have been assigned in a manner that precludes any individual from processing data transactions in their entirety or from maintaining records for transactions in which the individual participated. |  |  |  |
| 1. Effective fiscal procedures have been established for the routine verification of the accuracy of fiscal data when it is entered, processed, generated, distributed, or transferred. |  |  |  |
| 1. Individuals from different functions have appropriately segregated responsibility for control over assets and data and the processing of fiscal transactions. |  |  |  |
| 1. Effective contingency plans have been developed and documented to deal with service interruptions (delays to processing fiscal transactions) if they occur. |  |  |  |
| 1. Periodic tests of contingency and disaster recovery plans take place to make sure they are current, operational, and effective, and to ensure fiscal processes can be resumed within a reasonable timeframe following a service disruption. |  |  |  |
| 1. Appropriate controls are built-in as new financial information systems are designed and integrated into the program. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

**SECTION I: GOVERNANCE**

**ORGANIZATIONAL LEVEL**

**INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

**Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](http://www.doa.virginia.gov/reference.shtml#ARMICS)

|  |  |  |  |
| --- | --- | --- | --- |
| **INFORMATION** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. Adequate data-gathering mechanisms are in place to provide information to appropriate local CSA staff so that they can carry out their operating, reporting, and compliance responsibilities. |  |  |  |
| 1. Reports evaluating program outcomes generated or used by the FAPT/MDT/CPMT and other CSA stakeholders are adequate; contain sufficient and meaningful information. |  |  |  |
| 1. Mechanisms exist for identifying emerging information needs. |  |  |  |
| 1. An information technology (IT) plan has been developed that is linked to achieving the program objectives. |  |  |  |
| 1. IT plans are modified as needed to support new objectives. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| **COMMUNICATION** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. Communication channels exist for CSA stakeholders to effectively communicate up, down, across, and within the program. |  |  |  |
| 1. Information/analytical reports are provided to the right people, with the right level of detail, at the right time. |  |  |  |
| 1. Mechanisms are in place to identify emerging technology needs, establish priorities, and provide feedback on system performance. |  |  |  |
| 1. A clear communication channel is available to report suspected improprieties. |  |  |  |
| 1. Persons who report suspected improprieties are provided feedback and are not subject to retaliation. |  |  |  |
| 1. Realistic mechanisms are in place for CSA stakeholders to provide recommendations for improvement. |  |  |  |
| 1. Changes with respect to statewide and local objectives and strategies are communicated timely and effectively to all effected CSA stakeholders. |  |  |  |
| 1. Outside parties understand the program’s ethical and behavioral standards and expectations regarding dealings with the program. |  |  |  |
| 1. The CPMT is receptive to comments by internal and external auditors regarding control deficiencies or suggestions for process improvement. Appropriate actions are taken and documented. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

**SECTION I: GOVERNANCE**

**ORGANIZATIONAL LEVEL**

**INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

**Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](http://www.doa.virginia.gov/reference.shtml#ARMICS)

|  |  |  |  |
| --- | --- | --- | --- |
| **MONITORING** | | | |
| **This Control is Implemented and Operating Effectively** | **Response** | | **Comments** |
| **Agree** | **Disagree** |
| 1. The CPMT has established performance measures for processes and receives periodic reports of results against those measures. |  |  |  |
| 1. Individuals responsible for performance reports (operational and financial) are required to “sign off” on their accuracy and integrity and are held accountable if errors are discovered. |  |  |  |
| 1. Known departures from statutory compliance and/or CPMT-adopted policies, procedures, or practices that should have prevented or detected problems are reassessed and modified as appropriate. |  |  |  |
| 1. Evaluations of the entire internal control system *(including policies/procedures/practices)* are performed when there are major changes in operations. |  |  |  |
| 1. An appropriate level of documentation is developed to facilitate an understanding of how the system of internal control works *(such as policy manuals, flowcharts, and implementation memorandums)*. |  |  |  |
| 1. Local CSA staff is provided with sufficient internal control and compliance training sessions and feedback opportunities. |  |  |  |
| 1. Internal control deficiencies are identified by ongoing monitoring activities by the CPMT, including managerial activities and everyday supervision of CSA staff. |  |  |  |
| 1. Internal control deficiencies are identified during separate evaluations of the program's internal control system (i.e., *internal/external audit)*. |  |  |  |
| 1. Internal control deficiencies are reported to the person directly responsible for the activity and the CPMT. |  |  |  |
| 1. The CPMT ensures that the necessary follow-up actions are taken in response to reported control deficiencies. |  |  |  |
| 1. Specifications have been established for deficiencies that should be reported to state and local oversight bodies *(e.g., local government leaders, Office of Children’s Services, State Executive Council [SEC])*. |  |  |  |
| **Conclusions Reached and Actions Needed:** | | | |

**SECTION II: RISK MANAGEMENT**

* Risk Assessment Worksheet
  + Identification of Risk Exposures
  + Likelihood and Impact of Risk Exposures
  + Risk Response Plans
* Potential Risk Categories
* Risk Assessment Worksheet Supplement
* Fraud Risk Questionnaire

**SECTION II: RISK MANAGEMENT**

**RISK ASSESSMENT WORKSHEET**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| “Risk Assessment” is the process of analyzing potential events and considering likelihood and impact to determine those events’ possible impact on achievement of objectives. Management must assess the risk of unexpected potential events and any expected events that could have a significant impact. Risk assessment is a continuous and repetitive interplay of actions occurring throughout an organization.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](http://www.doa.virginia.gov/reference.shtml#ARMICS) | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| 1. Establish requirements for completing the risk assessment process, to include but not limited to:    1. Responsible Party    2. Frequency    3. Communicating Results    4. Implementation of Risk Responses. |  |  |  |  |  |
| 1. Perform and document a risk assessment of the local CSA program. The Risk Assessment Worksheet Supplement or a reasonable facsimile may be used.   *Note: The Local Agency Risk Assessment Survey may only be used to complement this task. It is not a substitute for the Risk Assessment Worksheet Supplement as it does not address risk response.* |  |  |  |  |  |
| 1. Ensure that an assessment of fraud risk is completed. Select at least 3 individuals from the local CSA program staff to complete the questionnaire.   *Suggestion: Vary selection from various stakeholder groups (CPMT, FAPT, MDT, CSA Coordinator, and Utilization Review.)* |  |  |  |  |  |
| 1. Communicate the results of the risk assessment to the appropriate parties.   *Include compiled results of the fraud risk questionnaire.* |  |  |  |  |  |
| 1. Verify and document the timely completion of the risk assessment’s implementation plan, if applicable. |  |  |  |  |  |

|  |  |  |  |
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| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION II: RISK MANAGEMENT**

**POTENTIAL RISK CATEGORIES**

**The chart below illustrates common risk categories that can generate discussion. Risk management activities should consider ALL potential risks to achieving program objectives, whether they are referenced explicitly in the risk categories described below.**

**Table

Description automatically generated**

**SECTION II: RISK MANAGEMENT**

**RISK ASSESSMENT WORKSHEET SUPPLEMENT**

|  |  |  |  |
| --- | --- | --- | --- |
| **SEVERITY RANKINGS & RESPONSE ACTIONS** | | | |
| **Potential Risk Event/Exposure** | | **Likelihood** | **Impact** | **Risk Response** | **Implementation Plan**  (*Check box if plan is required.*  *Required for all rated as high.*  *Include as an attachment*  *to this file.)* |
| **Rate as follows:**  **High** = 3  **Moderate** = 2  **Low** = 1 | | **Rate as follows**  **A** = Avoid  **R** = Reduce  **S** = Share  **X** = Accept |
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| **EXPLANATION OF KEY TERMS** | | | | | |
| **Likelihood** | **Defined as “the odds” that a given event will occur.** | | | | |
| **Impact** | **The measurement of the effect of the event in quantitative or qualitative terms.** | | | | |
| **Avoid** | **Ending those activities that give rise to risk *(e.g., eliminating a service or function)*.** | | | | |
| **Reduce** | **Involves everyday management decisions, including imposing control activities *(i.e., reviews, approvals, authorizations, inspections, reconciliations, and routine activities)*.** | | | | |
| **Sharing** | **Transfers a portion of likelihood or impact to another party *(e.g., outsourcing)*.** | | | | |
| **Acceptance** | **Taking no action in response to risk within parameters dictated by established policy. All risks cannot be eliminated. Risk that remains after all possible risk responses have been taken is accepted and often referred to as residual risk.** | | | | |
| **Probability** | **High (requires action to avoid or reduce the risk)** | | | | |
| **Moderate (requires action; reduce the risk)** | | | | |
| **Low (requires no action; accept the risk)** | | | | |

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| --- | --- | --- | --- | --- |
| **Prepared By:** |  | **Title:** | **Date:** | Click here to enter a date. |
| **Reviewed By:** |  | **Title:** | **Date:** | Click here to enter a date. |

**SECTION II: RISK MANAGEMENT**

**FRAUD RISK QUESTIONNAIRE**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Name:** | **Title:** | | | | **Date:** |
| **QUESTIONS** | | **RESPONSE** | | **COMMENTS** | |
| **YES** | **No** |
| 1. Has the local CSA program established or adopted the local government’s ethics policies and procedures? If yes, how is it communicated, and how often? | |  |  |  | |
| 1. Do representatives of the local CSA program exhibit high ethical standards? | |  |  |  | |
| 1. Has the local CSA program established internal controls *(e.g. policies/procedures, processes, practices, etc.)* to prevent, deter, and detect inappropriate and/or fraudulent activity? If no, skip to question 6. | |  |  |  | |
| 1. Are the internal controls established adequately designed to mitigate fraud risk/exposures, and are they operating as intended? | |  |  |  | |
| 1. What are the potential fraud risks/exposures of the local CSA program? | |  | |  | |
| 1. Are any CSA partner agencies particularly vulnerable to fraud? If yes, please explain. | |  |  |  | |
| 1. Is there a means for internal and/or external CSA stakeholders to report suspected fraud? If yes, explain. | |  |  |  | |
| 1. If an individual with ties to the local CSA program were aware of possible wrongdoing within the program, would the CPMT be informed? Please explain. | |  | |  | |
| 1. If someone wanted to acquire data, equipment, cash instruments, or manipulate local CSA records through improper and/or fraudulent means, how would it most likely be done, and what key personnel would be involved? | |  | |  | |
| 1. Are you aware of security breaches of sensitive data and physical assets (equipment/funds)? If yes, explain. | |  |  |  | |
| 1. Have you ever observed any unusual transactions/ activities recorded outside regular business hours? If yes, explain. | |  |  |  | |
| 1. Has anyone ever requested you to process an unusual or poorly documented transaction, something that you suspected was improper? If yes, please explain. | |  |  |  | |
| 1. Are you aware of any allegations of suspected fraud or proven instances of fraud in the local CSA program? If yes, explain. | |  |  |  | |
| 1. Are you aware of anyone with ties to managing CSA living outside their means/lifestyle, may have money issues, or whose demeanor or habits have suddenly changed? | |  |  |  | |
| 1. If you were assigned to audit the local CSA program, where would you spend your time/resources? | |  | |  | |
| 1. Have you personally perpetrated any fraud against CSA? If yes, explain. | |  |  |  | |

**SECTION III: INTERNAL CONTROL ASSESSMENT**

* Internal Control Worksheet
* Internal Control Questionnaire

**SECTION III: INTERNAL CONTROL**

**INTERNAL CONTROL WORKSHEET**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Internal Control is an ongoing process led by executive leadership designees to design and provide reasonable assurance that these types of objectives will be achieved:  • Effective and efficient operations,  • Reliable financial reporting,  • Compliance with applicable laws and regulations, and  • Safeguarding of assets and data.  No matter how well designed and operated, effective internal control provides only reasonable (not absolute) assurance. Achievement of objectives is always influenced by limitations inherent in all management processes, including:  • Faulty judgment or other human error,  • Collusion,  • Management override of controls, and  • Limitations disclosed by cost-versus-benefit analysis.  These limitations exist wherever internal controls exist, whether in the public, private, or not-for-profit sectors.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](http://www.doa.virginia.gov/reference.shtml#ARMICS) | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| 1. Establish requirements for completing an internal control assessment, to include but not limited to:    1. Responsible Party    2. Frequency    3. Communicating Results    4. Quality Improvement Plan |  |  |  |  |  |
| 1. Complete the internal control questionnaire included in this workbook. |  |  |  |  |  |
| 1. Communicate the results of the internal control assessment to appropriate parties and develop a quality improvement plan to address the deficiencies identified. |  |  |  |  |  |
| 1. Verify and document the timely completion of the internal control assessment and the implementation of quality improvement plans, if applicable. |  |  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION III: INTERNAL CONTROL**

**INTERNAL CONTROL QUESTIONNAIRE**

**(Page 1 of 4)**

**Objective I: To determine the adequacy of risk management, control, and governance processes.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Does your locality have more than one FAPT/MDT? If yes, how many? |  |  |
| 1. Is the fiscal agent a member of the CPMT and/or attends CPMT meetings regularly? |  |  |
| 1. Are appointed CPMT members authorized to make policy and funding decisions for their agencies?[**§ 2.2-5205**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5205/). |  |  |
| 1. Are FAPT/MDT members appointed with the authority to access services within their respective agencies? [**§ 2.2-5207**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5207/). |  |  |
| 1. Are parent representatives and private providers who serve on CPMT, MDT, or FAPT required to complete State and Local Government Conflict of Interest Act forms? [**§ 2.2-5205**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5205/) **and** [**§ 2.2-5207**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5207/). |  |  |
| 1. Are CPMT, FAPT, and/or MDT members required to abstain from decision-making involving individual cases in which they have either a personal or fiduciary interest? [**§ 2.2-5205**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5205/) **and** [**§ 2.2-5207**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5207/). |  |  |
| 1. Does the CPMT monitor the appropriate use of CSA funds? Please describe the process. |  |  |
| 1. Is there a procedure for addressing noted deficiencies? Please describe the process. |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**Objective II: To determine the degree of accomplishment of established CSA goals and objectives.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Does the local CSA program/unit have clearly defined goals and objectives, and are they documented? |  |  |
| 1. Are the goals and objectives consistent with the Children’s Services Act's and Appropriation Act's legislative intent? |  |  |
| 1. Do the results of operations appear to be consistent with the stated goals and objectives? |  |  |
| 1. Does CPMT periodically appraise the program for cost-effectiveness? |  |  |
| 1. Are the results of evaluations of the accomplishment of goals and objectives, as well as the appraisals of the effectiveness of the local CSA program, communicated to stakeholders? List how and frequency of communications. |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**SECTION III: INTERNAL CONTROL**

**INTERNAL CONTROL QUESTIONNAIRE**

**(Page 2 of 4)**

**Objective III: To determine the reliability and integrity of information.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Are individual service plans and financial transactions required to be authorized by appropriate FAPT, MDT, and CPMT designees? |  |  |
| 1. Are authorizations by appropriate FAPT, MDT, and CPMT designees evidenced in writing? |  |  |
| 1. Are there measures to help ensure that service plans and financial documents are complete, accurate, and processed timely? |  |  |
| 1. Are there measures to ensure that eligible CSA referrals are processed? |  |  |
| 1. Are there measures in place to prevent duplicate processing of transactions? |  |  |
| 1. Are there reconciliation procedures in place where appropriate *(e.g. inventory of case files; fund balance reconciliations)*? |  |  |
| 1. Have the program's records management and retention requirements been established and documented? |  |  |
| 1. Is there a process to get feedback on the reliability and integrity of information collected in eligibility determinations, service planning, and progress monitoring? |  |  |
| 1. Does this process appear to be adequate as designed? |  |  |
| 1. Is there evidence that management performs this control and initiates corrective action when necessary? |  |  |
| 1. Does the turnover rate of CPMT, FAPT, MDT members, and CSA Coordinators appear reasonable? |  |  |
| 1. Is training for CPMT/FAPT/MDT members and CSA Coordinators/employees adequate? |  |  |
| 1. Do CSA Coordinators have a backup in the event of an extended absence or vacancy? |  |  |
| 1. Is the program operating pretty much the same as a year ago, or have there been substantial changes? |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**SECTION III: INTERNAL CONTROL**

**INTERNAL CONTROL QUESTIONNAIRE**

**(Page 3 of 4)**

**Objective IV: To determine compliance with policies, plans, procedures, laws, regulations, etc.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Are policies, plans, procedures, laws, and regulations applicable to the local CSA program readily available to CPMT, MDT, and FAPT Members? |  |  |
| 1. Are the policies and procedures used by the local CSA program reasonably well written, and do they facilitate work performance? |  |  |
| 1. Is there evidence that local CSA procedures are updated promptly as changes are made? |  |  |
| 1. Is there a procedure in effect to ensure that new CPMT, MDT, and FAPT members, CSA Coordinators, local service agencies, private providers, employees responsible for coordinating CSA services and funding receive training in these policies, etc.? |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**Objective V: To determine if assets and/or data are adequately safeguarded.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Do controls (security of and accountability) over cash (if any) and valuable documents appear adequate? |  |  |
| 1. Are sensitive records physically secured from easy access by unauthorized personnel *(e.g. secured file cabinets)*? |  |  |
| 1. Are sensitive records stored electronically secured from easy access by unauthorized personnel *(e.g., password protected, encrypted flash drives, etc.)*? |  |  |
| 1. Is there a process established for the backup and recovery of data? |  |  |
| 1. Is the principle of least privilege applied in granting access to secure data (based on the user's specific needs; not everyone has full access)? |  |  |
| 1. Is staff required to participate in information security awareness training? |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**SECTION III: INTERNAL CONTROL**

**INTERNAL CONTROL QUESTIONNAIRE**

**(Page 4 of 4)**

**Objective VI: To determine if the entity’s operations are being conducted most economically and efficiently.**

|  |  |  |
| --- | --- | --- |
| **Questions** | **Answer**  Y / N / N/A | **Comments** |
| 1. Are lines of authority and responsibility of the CPMT, FAPT, MDT, and CSA Coordinator clearly drawn? |  |  |
| 1. Are plans to accomplish the goals and objectives of the program tied to the formal budget/pool fund allocations? |  |  |
| 1. Are CSA pool fund expenditure reimbursements and budget performance reviewed periodically? By whom? |  |  |
| 1. Can you confirm employees do not perform redundant or unnecessary steps? |  |  |
| 1. Does document processing flow appear efficient and timely and designed to minimize processing steps? |  |  |
| 1. Is all work that is performed meaningful and purposeful? |  |  |
| **Conclusions Reached and Actions Needed:** | | |

**SECTION IV: Training**

* Training Worksheet

**SECTION IV: TRAINING**

**TRAINING WORKSHEET**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Competence reflects the knowledge, skills, and abilities needed to meet objectives. Providing continuing training and education can reward expected performance and behavior. It is essential that employees are groomed to tackle new challenges as programs become more complex. Education, training, and coaching reduce the risk of error and inefficiency in operations by ensuring that personnel have the proper education and training to perform their duties effectively. Education and training programs should be periodically reviewed and updated to conform to any changes in the program environment or fiscal processing procedures.  **Source:** [**https://www.doa.virginia.gov/reference/ARMICS/ARMICS\_Standards.pdf**](http://www.doa.virginia.gov/reference.shtml#ARMICS) | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| 1. Determine whether a training plan has been established for local CSA program staff. |  |  |  |  |  |
| 1. Determine whether the local CSA program has established a frequency and/or venue for educating applicable stakeholders *(i.e., parents, community partners, private providers, judges, etc.) on local CPMT-approved CSA policies, procedures, resources,* and services. |  |  |  |  |  |
| 1. Maintain documentation to demonstrate the education of CSA staff and community stakeholders. (Examples could include participant lists, meeting agendas, meeting minutes, course outlines/syllabus, etc.) |  |  |  |  |  |
| 1. Ensure that training plans/ programs (if applicable) are updated periodically. |  |  |  |  |  |

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| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION V: COMPLIANCE**

* Compliance Assessment Worksheet
  + Compliance Supplemental Worksheets – Program Activities
    - CPMT Management
    - Client Level Review: Sample Selection and Methodology
    - FAPT/MDT Management
    - Family Engagement Planning
    - Mandatory Uniform Assessment Instrument
    - Intensive Care Coordination (ICC)
    - Treatment Foster Care (TFC)
    - Community-Based Behavioral Health Services
    - Special Education (SPED)
    - Utilization Management/Utilization Review (UM/UR)
    - Records Management – Disposal/Destruction
    - Records Management – Active Files
    - Data Access, Integrity, and Security
  + Compliance Supplemental Worksheets – Fiscal Activities
    - Client Eligibility
    - Expenditure Eligibility
    - Parental Contributions
    - Budget and Monitoring
    - “Carve-Out” of Allocation
    - Administrative Funds
    - Pool Fund Reimbursements
    - Supplemental Requests
* Local CPMT Compliance Assessment Worksheet

**SECTION V: COMPLIANCE**

**COMPLIANCE ASSESSMENT WORKSHEET**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| A purpose of the Children’s Services Act is to: "Ensure that services and funding are consistent with the Commonwealth's policies of preserving families and providing appropriate services in the least restrictive environment, while protecting the welfare of children and maintaining the safety of the public." Code of Virginia [§ 2.2-2648](https://law.lis.virginia.gov/vacode/2.2-2648/)(D)(20) states that the Council shall “deny state funding to a locality, in accordance with subdivision 19, where the CPMT fails to provide services that comply with the Children’s Services Act ([§ 2.2-5200](http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+2.2-5200) et seq.), any other state law or policy, or any federal law pertaining to the provision of any service funded in accordance with [§ 2.2-5211](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211/);" | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| **PROGRAM ACTIVITIES** |  | | | | |
| 1. Review program activities of the selected audit period *(e.g. most recent 12 months)* to assess compliance with federal, state, and local laws, policies, and procedures that govern CSA services. |  |  |  |  |  |
| 1. Document the assessment using the Compliance Supplemental Worksheet- Program Activities or a reasonable facsimile. |  |  |  |  |  |
| 1. Itemize deficiencies identified. |  |  |  |  |  |
| 1. Document CPMT discussion of deficiencies and quality improvement plan. |  |  |  |  |  |
| **FISCAL ACTIVITIES** |  | | | | |
| 1. Review fiscal activities of the selected audit period *(e.g. most recent 12 months)* to assess compliance with federal, state, and local laws, policies, and procedures governing CSA pool fund expenditures. |  |  |  |  |  |
| 1. Document the assessment using the Compliance Supplemental Worksheet- Fiscal Activities or a reasonable facsimile. |  |  |  |  |  |
| 1. Itemize deficiencies identified. |  |  |  |  |  |
| 1. Document CPMT discussion of deficiencies and quality improvement. |  |  |  |  |  |

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| **Completed By:** |  | **Date:** | Click here to enter a date. |

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| **Compliance Supplemental Worksheets – Program Activities**  **CPMT MANAGEMENT** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Determine the level of compliance by the local Community Policy and Management Teams (CPMT) with CSA laws, statutes, and policies established by the SEC. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5205**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5205/)  **COV** [**§ 2.2-5207**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5207/) | 1. The team shall also include a representative of a private organization or association of providers for children's or family services if such organizations or associations are located within the locality and a parent representative. |  |  |  |
| 1. Parent representatives who are employed by a public or private program that receives funds pursuant to this chapter or agencies represented on a community policy and management team may serve as parent representatives provided that parent representatives who are not employed by a public or private program that receives funds pursuant to this chapter or agencies represented on a community policy and management team are prioritized for participation where practicable. |  |  |  |
| 1. Those persons appointed to represent community agencies shall be authorized to make policy and funding decisions for their agencies. |  |  |  |
| 1. Persons serving on the team who are parent representatives or 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](http://law.lis.virginia.gov/vacode/2.2-3101/) of the State and Local Government Conflict of Interests Act, or a fiduciary interest. |  |  |  |
| **COV** [**§ 2.2-5206**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5206/) | The community policy and management team shall manage the cooperative effort in each community to better serve the needs of troubled and at-risk youths and their families and to maximize the use of state and community resources. Every such team shall: |  | | |
| * 1. Develop interagency policies and procedures to govern the provision of services to children and families in its community; |  |  |  |
| * 1. Develop interagency fiscal policies governing access to the state pool of funds by the eligible populations, including immediate access to funds for emergency services and shelter care; |  |  |  |
| * 1. Establish policies to assess the ability of parents or legal guardians to contribute financially to the cost of services to be provided and, when not specifically prohibited by federal or state law or regulation, provide for appropriate parental or legal guardian financial contribution, utilizing a standard sliding fee scale based upon ability to pay; |  |  |  |
| * 1. Coordinate long-range, community-wide planning that ensures the development of resources and services needed by children and families in its community, including consultation on the development of a community-based system of services established under § [16.1-309.3](http://law.lis.virginia.gov/vacode/16.1-309.3/); |  |  |  |
| * 1. Establish policies governing referrals and reviews of children and families to the family assessment and planning teams or a collaborative, multidisciplinary team process approved by the Council, including a process for parents and persons who have primary custody of a child to refer children in their care to the teams, and a process to review the teams' recommendations and requests for funding; |  |  |  |
| * 1. Establish quality assurance and accountability procedures for program utilization and funds management; |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **CPMT MANAGEMENT** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5206**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5206/) | 1. Establish procedures for obtaining bids on the development of new services; |  |  |  |
| 1. Manage funds in the interagency budget allocated to the community from the state pool of funds, the trust fund, and any other source; |  |  |  |
| 1. Authorize and monitor the expenditure of funds by each family assessment and planning team or a collaborative, multidisciplinary team process approved by the Council; |  |  |  |
| 1. Submit grant proposals that benefit its community to the state trust fund and enter into contracts for the provision or operation of services upon approval of the participating governing bodies; |  |  |  |
| 1. Serve as its community's liaison to the Office of Children’s Services, reporting on its programmatic and fiscal operations and on its recommendations for improving the service system, including consideration of realignment of geographical boundaries for providing human services; |  |  |  |
| 1. Collect and provide uniform data to the Council as requested by the Office of Children’s Services in accordance with subdivision D 16 of § [2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/); |  |  |  |
| 1. Review and analyze data in management reports provided by the Office of Children’s Services in accordance with subdivision D 18 of § [2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/) to help evaluate child and family outcomes and public and private provider performance in the provision of services to children and families through the Children’s Services Act program. |  |  |  |
| 1. Continued: Every team shall also review local and statewide data provided in the management reports on the number of children served, children placed out of state, demographics, types of services provided, duration of services, service expenditures, child and family outcomes, and performance measures. |  |  |  |
| 1. Continued: Additionally, teams shall track 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; |  |  |  |
| 1. Administer funds pursuant to § [16.1-309.3](http://law.lis.virginia.gov/vacode/16.1-309.3/); |  |  |  |
| 1. Have authority, upon approval of the participating governing bodies, to enter into a contract with another community policy and management team to purchase coordination services provided that funds described as the state pool of funds under § [2.2-5211](http://law.lis.virginia.gov/vacode/2.2-5211/) are not used; |  |  |  |
| 1. 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](http://law.lis.virginia.gov/vacode/2.2-2648/); and |  |  |  |
| 1. Establish policies and procedures for appeals by youth and their families of decisions made by local family assessment and planning teams regarding services to be provided to the youth and family pursuant to an individual family services plan developed by the local family assessment and planning team. Such policies and procedures shall not apply to appeals made pursuant to § [63.2-915](http://law.lis.virginia.gov/vacode/63.2-915/) or in accordance with the Individuals with Disabilities Education Act or federal or state laws or regulations governing the provision of medical assistance pursuant to Title XIX of the Social Security Act. |  |  |  |
| **Compliance Supplemental Worksheets – Program Activities**  **CPMT MANAGEMENT** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-2648**](http://law.lis.virginia.gov/vacode/2.2-2648/)**(D)(14)**  [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Sections**  **3.2.2**  **3.2.5(C)** | 1. The Council may review and approve requests from CPMTs to establish collaborative, multidisciplinary team (“MDT”) processes for referral for children and families pursuant to COV [§ 2.2-5209](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5209/). Consistent with the legislative and statutory goals of CSA and with the Children’s Services Practice Model that are cited herein, the Council will approve all MDT requests that comply with the following requirements: |  | | |
| a. Policies governing the MDT must be in writing and made available for review by the SEC and OCS. [(SEC Policy Manual 3.2.5(C))](https://www.csa.virginia.gov/Resources/PolicyGuides). |  |  |  |
| b. The policies must specify the purpose of the MDT, including the types of cases/circumstances that will be considered, how the MDT’s procedures and practices align and integrate with those of the CPMT’s member agencies, whether the MDT shall be a standing team that meets regularly or if it will operate on an ad hoc basis, (If on an ad hoc basis, under what circumstances will the MDT be convened and through what procedure), the minimum number of agency representatives to constitute the MDT (from among the FAPT-required agencies), and how the MDT will include family engagement practices and be family driven. [(SEC Policy Manual 3.2.5(C))](https://www.csa.virginia.gov/Resources/PolicyGuides). Documented family team processes adopted by any CPMT member agency (or agencies) can be included by reference in the CPMT’s MDT policy to satisfy this requirement. |  |  |  |
| c. The policies must specify the process through which funding approval requests will be submitted directly from the MDT to the CPMT. [(SEC Policy Manual 3.2.5(C))](https://www.csa.virginia.gov/Resources/PolicyGuides). |  |  |  |
| 1. Specific requirements for MDT members (i.e., those delineated in Section 3.2.4.C. and 3.2.4.D of this policy) shall apply. |  |  |  |
| **COV** [**§ 2.2-3707**](https://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3707/) | **CPMT Meetings** |  | | |
| 1. All meetings of public bodies shall be open, except as provided in § [2.2-3707.01](http://law.lis.virginia.gov/vacode/2.2-3707.01/) and § [2.2-3711](http://law.lis.virginia.gov/vacode/2.2-3711/). |  |  |  |
| 1. No meeting shall be conducted through telephonic, video, electronic, or other electronic communication means where the members are not physically assembled to discuss or transact public business, except as provided in § [2.2-3708.2](https://law.lis.virginia.gov/vacode/2.2-3708.2/) and § [2.2-3708.3](http://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3708.3/) or as may be specifically provided in [Title 54.1](https://law.lis.virginia.gov/vacode/title54.1/) for the summary suspension of professional licenses. |  |  |  |
| 1. Every public body shall give notice of the date, time, location, and remote location, if required, of its meetings by: 2. Posting such notice on its official public government website, if any; 3. Placing such notice in a prominent public location at which notices are regularly posted; and 4. Placing such notice at the office of the clerk of the public body or, in the case of a public body that has no clerk, at the office of the chief administrator. 5. All state public bodies subject to the provisions of this chapter shall also post notice of their meetings on a central, publicly available electronic calendar maintained by the Commonwealth. Publication of meeting notices by electronic means by other public bodies shall be encouraged. 6. The notice shall be posted at least three working days prior to the meeting. |  |  |  |
| 1. Notice, reasonable under the circumstance, of special, emergency, or continued meetings shall be given contemporaneously with the notice provided to the members of the public body conducting the meeting. |  |  |  |
| 1. At least one copy of the proposed agenda and all agenda packets and, unless exempt, all materials furnished to members of a public body for a meeting shall be made available for public inspection at the same time such documents are furnished to the members of the public body. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **CPMT MANAGEMENT** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-3707**](https://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3707/) | 1. Minutes shall be taken at all open meetings. However, minutes shall not be required to be taken at deliberations of (i) standing and other committees of the General Assembly; (ii) legislative interim study commissions and committees, including the Virginia Code Commission; (iii) study committees or commissions appointed by the Governor; or (iv) study commissions or study committees, or any other committees or subcommittees appointed by the governing bodies or school boards of counties, cities and towns, except where the membership of any such commission, committee or subcommittee includes a majority of the governing body of the county, city, or town or school board. |  |  |  |
| 1. Minutes, including draft minutes, and all other records of open meetings, including audio or audio/visual records shall be deemed public records and subject to the provisions of this chapter. |  |  |  |
| 1. Minutes shall be in writing and shall include (a) the date, time, and location of the meeting; (b) the members of the public body recorded as present and absent; and (c) a summary of the discussion on matters proposed, deliberated, or decided, and a record of any votes taken. In addition, for electronic communication meetings conducted in accordance with § [2.2-3708.2](https://law.lis.virginia.gov/vacode/2.2-3708.2/) or § [2.2-3708.3](http://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3708.3/), minutes shall include (1) the identity of the members of the public body who participated in the meeting through electronic communication means, (2) the identity of the members of the public body who were physically assembled at one physical location, and (3) the identity of the members of the public body who were not present at the location identified in clause (2) but who monitored such meeting through electronic communication means. |  |  |  |
| **COV** [**§ 2.2-3712**](https://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3712/) | 1. No closed meeting shall be held unless the public body proposing to convene such meeting has taken an affirmative recorded vote in an open meeting approving a motion that (i) identifies the subject matter, (ii) states the purpose of the meeting as authorized in subsection A of § [2.2-3711](http://law.lis.virginia.gov/vacode/2.2-3711/) or other provision of law and (iii) cites the applicable exemption from open meeting requirements provided in subsection A of § [2.2-3711](http://law.lis.virginia.gov/vacode/2.2-3711/) or other provision of law. The matters contained in such motion shall be set forth in detail in the minutes of the open meeting. A general reference to the provisions of this chapter, the authorized exemptions from open meeting requirements, or the subject matter of the closed meeting shall not be sufficient to satisfy the requirements for holding a closed meeting. |  |  |  |
| 1. The public body holding a closed meeting shall restrict its discussion during the closed meeting only to those matters specifically exempted from the provisions of this chapter and identified in the motion required by subsection A. |  |  |  |
| 1. At the conclusion of any closed meeting, the public body holding such meeting shall immediately reconvene in an open meeting and shall take a roll call or other recorded vote to be included in the minutes of that body, certifying that to the best of each member's knowledge (i) only public business matters lawfully exempted from open meeting requirements under this chapter and (ii) only such public business matters as were identified in the motion by which the closed meeting was convened were heard, discussed or considered in the meeting by the public body. Any member of the public body who believes that there was a departure from the requirements of clauses (i) and (ii), shall so state prior to the vote, indicating the substance of the departure that, in his judgment, has taken place. The statement shall be recorded in the minutes of the public body. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **CPMT MANAGEMENT** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-3712**](https://law.lis.virginia.gov/vacode/title2.2/chapter37/section2.2-3712/) | 1. Failure of the certification required by subsection D to receive the affirmative vote of a majority of the members of the public body present during a meeting shall not affect the validity or confidentiality of such meeting with respect to matters considered therein in compliance with the provisions of this chapter. The recorded vote and any statement made in connection therewith, shall upon proper authentication, constitute evidence in any proceeding brought to enforce the provisions of this chapter. |  |  |  |
| 1. Except as specifically authorized by law, in no event may any public body take action on matters discussed in any closed meeting, except at an open meeting for which notice was given as required by § [2.2-3707](http://law.lis.virginia.gov/vacode/2.2-3707/). |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **CLIENT-LEVEL REVIEW: SAMPLE SELECTION AND METHODOLOGY** | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | |
| **Purpose** | Based on a review of client-specific records, including service planning and funding authorizations, determine the level of compliance by local Community Policy and Management Teams (CPMT) and Family Assessment and Planning Teams (FAPT) with CSA laws, statutes, and policies established by the SEC. | | |
| **Procedure** | Select a representative sample of all FAPT/MDT referrals processed in the selected review period (e.g., most recent 12 months), documenting the sample selection methodology. | | |
| **Methodology** | Description | Comments/Notes | |
| 1. Select the most recent 12 months for the period of review (e.g., November 1 to October 31) | (Record period selected here) | |
| 1. Identify the total client population/records. List the number of current and inactive/closed cases and your data source (e.g., Thomas Brothers, Harmony, Child-Based Data Reporting System [CBDRS], internally managed lists, etc.). | (Record population count and source of information here) | |
| 1. Select a representative sample from client populations for examination. The sample selected should consider mandate types, service placement types, expenditure categories, and service names.   (Tools: Microsoft Excel Data Analysis Tools, includes random number generator) | (Describe how the sample was selected. Include the number of cases selected and the tools [judgment, random number selection, etc.] used to make selections) | |
| 1. List the cases selected for review. | (List the cases selected using client initials and/or case ID number as shown in LEDRS) | |
| **Applicability** | **This sample selection may be used to evaluate all relevant compliance criteria in the remaining sections of this workbook as indicated below.** | | |
| **Program Activities** | | **Fiscal Activities** |
| * + - FAPT/MDT Management     - Family Engagement Planning     - Mandatory Uniform Assessment Instrument     - Intensive Care Coordination (ICC)     - Treatment Foster Care (TFC)     - Community-Based Behavioral Health Services     - Special Education (SPED)     - Utilization Management/Utilization Review (UM/UR)     - Records Management – Active Files | | * Client Eligibility * Expenditure Eligibility * Parental Contributions * Budget and Monitoring |

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| **Compliance Supplemental Worksheets – Program Activities**  **FAPT/MDT MANAGEMENT** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5208**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5208/) | The family assessment and planning team, in accordance with § [2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/), shall assess the strengths and needs of troubled youths and families who are approved for referral to the team and identify and determine the complement of services required to meet these unique needs. Every such team, in accordance with policies developed by the CPMT shall:  (§ [2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/)(D)(22)) |  | | |
| 1. Review referrals of youth and families to the team; |  |  |  |
| 1. Provide for family participation in all aspects of assessment, planning, and implementation of services; |  |  |  |
| 1. Provide for the participation of foster parents in the assessment, planning and implementation of services when a child has a program goal of permanent foster care or is in a long-term foster care placement. The case manager shall notify the foster parents of a troubled youth of the time and place of all assessment and planning meetings related to such youth. Such foster parents shall be given the opportunity to speak at the meeting or submit written testimony if the foster parents are unable to attend. The opinions of the foster parents shall be considered by family assessment and planning team in its deliberations; |  |  |  |
| 1. Develop an individual family services plan (IFSP) for youths and families reviewed by the team that provides for appropriate and cost-effective services; |  |  |  |
| 1. Identify children who are at risk of entering, or are placed in, residential care through the CSA program who can be appropriately and effectively served in their homes, relatives' homes, family-like settings, and communities. For each child entering or in residential care, in accordance with the policies of the CPMT developed pursuant to subdivision 17 of § [2.2-5206](http://law.lis.virginia.gov/vacode/2.2-5206/), the FAPT or approved alternative MDT, in collaboration with the family, shall (i) identify the strengths and needs of the child and his family through conducting or reviewing comprehensive assessments, including but not limited to information gathered through the mandatory uniform assessment instrument… |  |  |  |
| 1. Continued: … (ii) identify specific services and supports necessary to meet the identified needs of the child and his family, building upon the identified strengths, (iii) implement a plan for returning the youth to his home, relative’s home, family-like setting, or community at the earliest appropriate time that addresses his needs, including identification of public or private community-based services to support the youth and his family during transition to community-based care, and (iv) provide regular monitoring and utilization review of the services and residential placement for the child to determine whether the services and placement continue to provide the most appropriate and effective services for the child and his family; |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **FAPT/MDT MANAGEMENT** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5208**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5208/) | 1. Where parental or legal guardian financial contribution is not specifically prohibited by federal or state law or regulation, or has not been ordered by the court or by the DCSE, assess the ability of parents or legal guardians, utilizing a standard sliding fee scale, based upon ability to pay, to contribute financially to the cost of services to be provided and provide for appropriate financial contribution from parents or legal guardians in the IFSP; |  |  |  |
| 1. Refer the youth and family to community agencies and resources in accordance with the individual family services plan; |  |  |  |
| 1. Recommend to the community policy and management team expenditures from the local allocation of the state pool of funds; and |  |  |  |
| 1. Designate a person who is responsible for monitoring and reporting, as appropriate, on the progress being made in fulfilling the individual family services plan developed for each youth and family, such reports to be made to the team or the responsible local agencies. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **FAMILY ENGAGEMENT PLANNING** | | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | | |
| **PROCEDURE 1** | Determine whether the CPMT has established a family engagement policy and procedure. Review the established policy and procedure to verify the existence of the required elements. Links to family engagement policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | |
| **RESOURCES** | * [Recruiting and Retaining Parent Members on Interagency Teams](https://csa.virginia.gov/content/pdf/Recruiting_and_Retaining_Parent_Members_on_Interagency_Teams.pdf) * [Model CPMT Family Referral Policy, 2015](https://csa.virginia.gov/content/pdf/Model_Family_Referral_Policy.pdf) * [Best Practices for Elevating Parent Voice](https://www.csa.virginia.gov/content/doc/Best_Practices_for_Elevating_Parent_Voices.pdf) | | | | |
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| **Reference** | **Description** | **Compliance Status** | | | |
| **Full** | **Partial** | | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.3** | 1. Family participation in CSA must go beyond simply inviting family members to attend FAPT meetings and informing them about the decisions made in the FAPT process. The decision-making process must be family-focused.” ([SEC Policy Manual, Section 3.3.4](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(A)). |  |  | |  |
| 1. CPMTs must have written policies for FAPT processes that describe how they ensure family and youth involvement in the assessment, planning, delivery, and review of services. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(A)). |  |  | |  |
| 1. Policies should make allowances for family members who cannot attend meetings held during regular business hours. Local CSA programs should consider holding FAPT meetings at non-traditional hours, prioritizing maximum family engagement. |  |  | |  |
| 1. Local CSA programs should explore and, where feasible, arrange audio, video, and other Access and Functional Needs component platforms for virtual participation, when appropriate. |  |  | |  |
| 1. All communication with youth and family, whether oral or in writing, will be provided, as feasible, in the youth and family's language of choice, and be mindful of various dialects and literacy needs. |  |  | |  |
| 1. CSA programs and participating agencies should identify resources and arrange for translation services where needed. |  |  | |  |
| 1. CSA program policies and practices should incorporate a review process to assure that all communication materials are easily understandable and accessible to families. This should include minimal use of jargon and technical language. |  |  | |  |
| 1. The CPMT is responsible for equitable, consistent, efficient, and effective CSA services to children and their families. Redundant or duplicative processes should be streamlined, both within the CSA program and across child-serving agencies, to promote family engagement. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(C)). |  |  | |  |
| 1. Youth and family shall be given accurate information regarding the CSA process, their role and rights during the process, and how decisions are made regarding service delivery. This information includes an explanation of the affiliations and roles of the various participants in the process. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(D)). |  |  | |  |
| 1. Training, along with general information regarding the eligibility for CSA and the CSA decision-making process, should be available for all interested stakeholders. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(D)(1)). |  |  | |  |
| **Compliance Supplemental Worksheets – Program Activities**  **FAMILY ENGAGEMENT PLANNING** | | | | | |
| **Reference** | **Description** | **Compliance Status** | | | |
| **Full** | **Partial** | **Non** | |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.3** | 1. CPMTs are responsible for implementing procedures to assess and measure the quality of family engagement protocols and processes. These include, but are not limited to, periodic surveys of youth and families to better understand the CSA process from their perspectives. Local CSA programs should strive to stay aware of the success of their family engagement efforts and areas for improvement. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(E)). |  |  |  | |
| 1. CSA program staff and agency participants should hold themselves to the highest standards of respect for and responsiveness to all aspects of diversity, including differences in race, economic status, culture, disability status, gender identity, and other areas when interacting with youth and family. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(F)) |  |  | |  |
| 1. Local CSA programs should engage in outreach regarding the CSA process to marginalized youth and families, including, but not limited to, non-English speakers, those experiencing housing insecurity, and those experiencing poverty. In doing so, the CPMT should form partnerships with diverse and representative families, businesses, and community organizations. ([SEC Policy Manual, Section 3.3.5](https://www.csa.virginia.gov/content/doc/CSA_Policy_Manual.pdf)(G)). |  |  | |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **MANDATORY UNIFORM ASSESSMENT INSTRUMENT** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **RESOURCES** | [Individual User and Confidentiality Agreement for CANVaS 2.0](https://csa.virginia.gov/Content/pdf/CANVaS_2_0_User_Agreement.pdf) | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Sections**  **3.6.4**  **3.6.5** | 1. The Child and Adolescent Needs and Strength Assessment (CANS) shall be the uniform assessment instrument for children and youth receiving services funded through the state pool. |  |  |  |
| 1. All children receiving CSA state pool-funded services shall have CANS assessments completed in accordance with the parameters specified in this policy. |  |  |  |
| 1. Any child and family receiving CSA-funded services shall be administered the CANS assessment. |  |  |  |
| 1. The Initial CANS is required to determine and/or support the child’s eligibility for CSA consistent with the statutory requirement in COV [**§ 2.2-5212**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5212/)**.** |  |  |  |
| 1. The Initial CANS must be completed prior to the initiation of CSA-funded services described on a service plan *(e.g., Individual Family Service Plan, Individualized Education Program, or Foster Care Plan)*, with an exception (14 days) for emergency services and placements as provided for in [**§ 2.2-5209**](https://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5209/)**.** |  |  |  |
| 1. The CANS assessment is required annually. “Annually” is defined as within 60 calendar days of the anniversary date of the Initial CANS or subsequent Annual CANS, meaning the reassessment may fall 60 days prior to, on the date of, or 60 calendar days subsequent to the anniversary of the previous annual assessment date.  * The Reassessment version of the CANS may be used for the Annual assessment. Local governments shall have the discretion to use either the Comprehensive version or the Reassessment version of the CANS for the Annual assessment. * The CANS completed within the timeframe noted above shall be referred to as the “Annual CANS.” |  |  |  |
| 1. Local policy adopted by the Community Policy and Management Team (CPMT) shall direct the frequency of reassessment of the CANS between the one-year intervals of required Annual CANS unless otherwise required by another funding source *(e.g. Medicaid)*. |  |  |  |
| 1. The Discharge CANS shall be the Comprehensive version of the CANS. |  |  |  |
| 1. Discharge CANS are required only when a child’s CSA case is closed. A CPMT may opt to complete a Discharge CANS when transferring a case to another locality according to local written policy. |  |  |  |
| 1. The Discharge CANS may be done 90 days prior to, at the time of, or within 90 days following either the completion of all CSA-funded services, or final FAPT review. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **MANDATORY UNIFORM ASSESSMENT INSTRUMENT** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.6.5** | 1. Continued: 2. A Discharge CANS is not required in any of the following situations:    1. when a child and family receive CSA-funded services for less than 30 calendar days. An Initial CANS is required in such instances.    2. at the time of transfer of services from one locality to another. The receiving locality will complete CANS as required per their local schedule.    3. when one service ends, but the child and/or family continue to receive other CSA-funded services. |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.6.7.C** | 1. Paper CANS score sheets may only be used if the individual administering the CANS is (1) appropriately certified, and (2) the information from the score sheet is entered into CANVaS within 60 days by the assessor or an authorized data entry person. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **INTENSIVE CARE COORDINATION** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | Determine whether the CPMT has established an intensive care coordination (ICC) policy and procedure. Review the established policy and procedure to verify the existence of the required elements. Links to ICC policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below, where applicable. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **RESOURCES** | * [ICC in a HFW Model](https://csa.virginia.gov/Content/pdf/ICC_In_A_HFW_Model.pdf) * [ICC Frequently Asked Questions](https://csa.virginia.gov/Content/doc/ICC_FAQ.pdf) * [SEC Policy on ICC](https://csa.virginia.gov/Content/pdf/SECComprehensiveServicesActICCFinalPolicy.pdf) * [ICC Trained Providers](https://csa.virginia.gov/Content/doc/ICC_Trained_Providers.pdf) * [Family Support Partners in High Fidelity Wraparound](https://csa.virginia.gov/Content/pdf/Family_Support_Partners_in_the_High_Fidelity_Wrap_Process.pdf) * [HFW Activities And Documentation](https://csa.virginia.gov/Content/pdf/High_Fidelity_Wraparound_Activities_and_Documentation.pdf) * [HFW Framework](https://csa.virginia.gov/Content/pdf/HFW_Framework.pdf) | | | |
| **APPLICABLE CASES** | YES  No. Skip this Section | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| Current Appropriation Act | 1. At the direction of the State Executive Council, local Community Policy and Management Teams (CPMTs) and Community Services Boards (CSBs) shall work collaboratively in their service areas to develop a local plan for intensive care coordination (ICC) services that best meets the needs of the children and families. If there is more than one CPMT in the CSB's service area, the CPMTs and the CSB may work together as a region to develop a plan for ICC services. Local CPMTs and CSBs shall also work together to determine the most appropriate and cost-effective provider of ICC services for children in their community who are placed in, or at-risk of being placed in, residential care through the Children’s Services Act, in accordance with guidelines developed by the State Executive Council. |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 6.1** | 1. **Population to be Served by ICC.** Youth shall be identified for ICC by the FAPT. Eligible youth shall include: 2. Youth placed in out-of-home care 3. Youth at risk of placement in out-of-home care.   *Note: ICC cannot be provided to individuals receiving other reimbursed case management including Treatment Foster Care Case Management, Mental Health Case Management, Substance Abuse Case Management, or case management provided through Medicaid waivers.* |  |  |  |
| 1. Providers of ICC shall meet the following staffing requirements: 2. **Employ at least one supervisory/management staff who has documentation establishing completion of annual training in the national model of “High Fidelity Wraparound” as required for supervisors and management/ administrators (such documentation shall be maintained in the individual’s personnel file.** |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **INTENSIVE CARE COORDINATION** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 6.1** | 1. Continued: Providers of ICC shall meet the following staffing requirements: |  | | |
| 1. **Employ at least one staff member who has documentation establishing completion of annual training in the national model of “High Fidelity Wraparound” as required for practitioners *(i.e., Intensive Care Coordinators)*. Such documentation shall be maintained in the individual’s personnel file.** |  |  |  |
| 1. **ICC shall be provided by Intensive Care Coordinators who possess a Bachelor’s degree with at least two years of direct, clinical experience providing children’s mental health services to children with a mental health diagnosis.** |  |  |  |
| 1. **Intensive Care Coordinators shall complete training in the national model of “High Fidelity Wraparound” as required for practitioners.** |  |  |  |
| 1. **Intensive Care Coordinators shall participate in ongoing coaching activities.** |  |  |  |
| 1. **Providers of Intensive Care Coordination shall ensure supervision of all Intensive Care Coordinators to include clinical supervision at least once per week. All supervision must be documented, to include the date, begin time, end time, topics discussed, and signature and credentials of the supervisor** |  |  |  |
| 1. **Supervisors of ICC shall possess a Master’s degree in social work, counseling, psychology, sociology, special education, human, child, or family development, cognitive or behavioral sciences, marriage and family therapy, art or music therapy with at least four years of direct, clinical experience in providing children’s mental health services to children with a mental health diagnosis.** |  |  |  |
| 1. **Supervisors shall either be licensed mental health professionals (as that term is defined in** [12VAC35-105-20](https://law.lis.virginia.gov/admincode/title12/agency35/chapter105/section20/)**) or a documented Resident or Supervisee of the Virginia Board of Counseling, Psychology, or Social Work with specific clinical duties at a specific location pre-approved in writing by the applicable Board.** |  |  |  |
| 1. **Supervisors of ICC shall complete training in the national model of “High Fidelity Wraparound” as required for supervisors and management/ administrators.** |  |  |  |
| 1. **Training in the national model of “High Fidelity Wraparound” shall be required for all Intensive Care Coordinators and Supervisors including participation in annual refresher training.** |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **TREATMENT FOSTER CARE** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | Review the established policy and procedure to verify compliance with the required elements. Links to the Treatment Foster Care policy are included for reference. | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below, where applicable. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **APPLICABLE CASES** | YES  No. Skip this Section | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 6.2** | Effective July 1, 2015, when purchasing foster care services through a licensed child-placing agency, Community Policy and Management Teams shall ensure that levels of foster care services are appropriately matched to the individual needs of a child or youth in accordance with the SEC-approved “Guidelines for Determining Levels of Care for Foster Care Services with Licensed Child Placing Agencies.”.   * [Guidelines for the Use of Treatment Foster Care](https://csa.virginia.gov/content/pdf/Guidelines_for_the_Use_of_Treatment_Foster_Care-April-2012.pdf) * [SEC Guidelines for Treatment Foster Care-Levels of Care](https://csa.virginia.gov/content/pdf/TFC_Guidelines_Revised_May_1_2015.pdf) * [FAQ: Treatment Foster Care under the SEC Levels of Care Policy and Guidelines](https://csa.virginia.gov/content/doc/FAQ_Treatment_Foster_Care.pdf) |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **COMMUNITY-BASED BEHAVIORAL HEALTH SERVICES** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | Review the established policy to verify local compliance with the required elements. Links to community-based behavioral health services policy are included for reference. | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below, where applicable. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **RESOURCES** | * [Model Community-Based Behavioral Health Services](https://csa.virginia.gov/content/doc/Model_Community-Based_Behavioral_Health_Services.pdf) * [Request for Exception to Policy](https://csa.virginia.gov/content/doc/Request_for_Exception_to_Policy.pdf) | | | |
| **APPLICABLE CASES** | YES  No. Skip this Section | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual, Section 6.3** | The term “community-based behavioral health services” shall apply and refer to the following DMAS-regulated services: Intensive In-Home, Therapeutic Day Treatment, and Mental Health Support Services. |  | | |
| 1. For Medicaid-eligible children and youth: State Pool Funds shall not be used to purchase community-based behavioral health services for a Medicaid-eligible client. Children and youth in crisis shall be referred to emergency services. It is not the intent of this policy to prevent the use of Pool Funds to purchase non-behavioral health services necessary to meet the social, educational, or safety needs of Medicaid-eligible children, youth, and families. |  |  |  |
| 1. For children and youth not eligible for Medicaid: For children and youth for whom community-based behavioral health services will be purchased with Pool Funds, the FAPT shall maintain documentation that the child or youth meets the criteria established by DMAS regulations for the specific community-based behavioral health service to be provided. This documentation shall include the signature and written approval of a licensed mental health professional. The licensed mental health professional shall state his/her credentials on such signed written approval and shall not be a supervisor of or the provider of the service for which approval is given. |  |  |  |
| 1. State Pool Funds may be used to purchase an independent clinical assessment conducted in accordance with DMAS requirements for such assessment. |  |  |  |
| 1. The CPMT may request an exception to this policy through the OCS when the CPMT believes there are exceptional circumstances that warrant an exception to this policy and/or a Medicaid-enrolled provider of a needed service is not available3 for Medicaid-eligible children and youth. Such requests shall be made in writing and shall state the reason(s) and describe the circumstances supporting the CPMT’s claim |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **SPECIAL EDUCATION (SPED) &SPED Wrap-Around Services/Funding** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below, where applicable. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. Links to SPED policy and related guidance are included for reference. | | | |
| **RESOURCES** | [*Special Education and the Children's Services Act: Guidance for CPMTs, FAPTs, CSA Coordinators, and Local School Divisions*](https://csa.virginia.gov/content/doc/Special_Education_and_CSA-Guidance_for_CPMTs_FAPTs_CSACoordinators_Local_School_Divisions.pdf) | | | |
| **APPLICABLE CASES** | *YES  No. Skip this Section* | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(A)** | 1. Funds for private special education services shall only be expended on private educational programs that are licensed by the Board of Education or an equivalent out-of-state licensing agency. Effective July 1, 2022, funds for private special education services shall only be expended on private educational programs that the Office of Children's Services certifies as having reported their tuition rates on a standard reporting template developed by the Office. |  |  |  |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(B)(1) and (B)(2)** | 1. The target population shall be the following:    1. Children and youth placed for purposes of special education in approved private school educational programs, previously funded by the Department of Education through private tuition assistance.    2. Children and youth with disabilities placed by local social services agencies or the Department of Juvenile Justice in private residential facilities or across jurisdictional lines in private, special education day schools, if the individualized education program (IEP) indicates such school is the appropriate placement while living in foster homes or child-caring facilities, previously funded by the Department of Education through the Interagency Assistance Fund for Noneducational Placements of Handicapped Children. |  |  |  |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(B)(6)** | 1. Children and youth previously placed pursuant to subdivision 1 in approved private school educational programs for at least six months who will receive transitional services in a public school setting. State pool funds shall be allocated for no longer than 12 months for transitional services. Local agencies may contract with a private school education program provider to provide transition services in the public school. |  |  |  |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(D)**  **OCS Admin Memo #21-09**  [**Special Education - Transitional Services in the Public School Setting**](https://csa.virginia.gov/content/doc/Administrative_Memo_21-09.pdf) | 1. Further, in any instance that an individual 18 through 21 years of age, inclusive, who is eligible for funding from the state pool and is properly defined as a school-aged child with disabilities pursuant to § [22.1-213](http://law.lis.virginia.gov/vacode/22.1-213/) is placed by a local social service agency that has custody across jurisdictional lines in a group home in the Commonwealth and the individual’s IEP, as prepared by the placing jurisdiction, indicates that a private day school placement is the appropriate educational program for such individual, the financial and legal responsibility for the individual’s special education services and IEP shall remain, in compliance with the provisions of federal law, Article 2 ([§ 22.1-213](http://law.lis.virginia.gov/vacode/22.1-213/)) of Chapter 13 of Title 22.1, and Board of Education regulations, the responsibility of the placing jurisdiction until the individual reaches the age of 21, inclusive, or is no longer eligible for special education services. The financial and legal responsibility for such special education services shall remain with the placing jurisdiction, unless the placing jurisdiction has transitioned all appropriate services with the individual. |  |  |  |
| **Compliance Supplemental Worksheets – Program Activities**  **SPECIAL EDUCATION (SPED) &SPED Wrap-Around Services/Funding** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.1.3** | 1. The special education mandate cited in COV [§ 2.2-5211](http://law.lis.virginia.gov/vacode/2.2-5211)(B)(1) may be utilized to fund non-residential services in the home and community for a student with a disability when the needs associated with his/her disability extend beyond the school setting and threaten the student’s ability to be maintained in the home, community, or school setting. |  |  |  |

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| **Compliance Supplemental Worksheets Program Activities**  **UTILIZATION MANAGEMENT AND UTILIZATION REVIEW** | | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | | |
| **PROCEDURE 1** | Determine whether the CPMT has established a utilization management/utilization review (UM/UR) plan. Review the established policy and procedure to verify the existence of the required elements. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | |
| **RESOURCES** | **Utilization Review** | * [Utilization Review Guidelines](https://csa.virginia.gov/content/doc/Utilization_Review_Guidelines.pdf) * [Model UR Form](https://csa.virginia.gov/content/doc/Model_UR_Form.docx) * [UR Might Ask](https://csa.virginia.gov/content/doc/UR_Might_Ask.pdf) | | | |
| **Utilization Management** | * [Data and Outcomes Dashboard (CQI)](https://csa.virginia.gov/Resources/CQIDashboardReport) * https://csa.virginia.gov/OCSReports/Reports/UtilizationReport.aspx * [Strategic Planning Tools (CQI) Documentation Template with Instructions (Download)](https://csa.virginia.gov/content/doc/Strategic_Planning_Tools_(CQI)_Documentation_Template_with_Instructions.xlsx) * [Strategic Planning Tools (CQI) Terms and Definitions](https://csa.virginia.gov/content/doc/Strategic_Planning_Tools_(CQI)_Terms_and_Definitions.pdf) * [Strategic Planning Tools (CQI) Training](https://csa.virginia.gov/content/doc/Strategic_Planning_Tools_(CQI)_Training.pdf) | | | |
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| **Reference** | **Description** | | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| COV [§ 2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/)(D)(15). | 1. Each locality receiving funds for activities under the Children’s Services Act shall have a locally determined utilization management p following the guidelines or use of a process approved by the State Executive Council, covering all CSA-funded services; COV [§ 2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/)(D)(15). | |  |  |  |
| **Current Appropriation Act** | 1. Utilizing a secure electronic site, each locality shall also provide information as required by the Office of Children's Services to include, but not be limited to case-specific information, expenditures, number of youth served in specific CSA activities, length of stay for residents in core licensed residential facilities,., and proportion of youth placed in treatment settings suggested by the uniform assessment instrument. | |  |  |  |
| 1. Only non-identifying aggregate demographic, service, and expenditure information shall be made available to the public. | |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **RECORDS MANAGEMENT – DISPOSAL/DESTRUCTION** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | 1. Determine whether the CPMT has established records management policy/procedures. Verify the existence of state-required elements. Links to the records management policy are included for reference. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **PROCEDURE 2** | 1. Review records retention files for documentation evidencing records destruction schedules were completed (if applicable). Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **APPLICABILITY** | YES  No. Skip this Section | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**Title 42.1. Libraries**](http://law.lis.virginia.gov/vacode/title42.1/) **»** [**Chapter 7. Virginia Public Records Act**](http://law.lis.virginia.gov/vacode/title42.1/chapter7/)  **Records Management Retention Schedules, General Schedules for Localities** [**GS-15**](http://www.lva.virginia.gov/agencies/records/sched_local/GS-15.pdf) **and** [**GS-19**](http://www.lva.virginia.gov/agencies/records/sched_local/GS-19.pdf) | “1. This schedule is continuing authority under the provisions of the Virginia Public Records Act, [§ 42.1-76](https://law.lis.virginia.gov/vacode/title42.1/chapter7/) et seq. of the Code of Virginiafor the retention and disposition of the records as stated on the attached page(s).  . . .  3. This schedule is used in conjunction with the Certificate of Records Destruction (RM-3 Form). A completed RM-3 Form must be approved by an agency-designated records officer before records can be destroyed.”  After a record is destroyed or discarded, the agency shall forward the original certificate of records destruction to The Library of Virginia. ([COV § 42.1-86.1](https://law.lis.virginia.gov/vacode/title42.1/chapter7/section42.1-86.1/)(A)) |  |  |  |
| **Library of Virginia, Records Management Retention Schedule, General Schedule for Localities** [**GS-19**](http://www.lva.virginia.gov/agencies/records/sched_local/GS-19.pdf)**, Administrative Records (September 2024)** | 1. Annual Disclosure of Economic Interests   This series consists of the disclosure of economic interest forms filed by members of governing bodies, commissions, and boards. COV § 2.2-3115; COV § 2.2-3117; COV § 2.2-3115C. Series No. 010008 – Retain 5 years after end of calendar year; Confidential Destruction. |  |  |  |
| 1. Minutes: Entity Having Enforcement, Regulatory, or Decision Powers   This series documents the proceedings of meetings of boards, councils, conferences, committees, offices, and other groups having enforcement, regulatory or decision powers. This series includes indexes to minutes. Series No. 010029 – Permanent in Agency. |  |  |  |
| **Library of Virginia, Records Management Retention Schedule, General Schedule for Localities** [**GS-15**](http://www.lva.virginia.gov/agencies/records/sched_local/GS-15.pdf)**, Social Services (March 2024)** | 1. Family Services: Service Cases – Children’s Services Act (CSA)   This series documents services to high-risk youth as part of the Children’s Services Act (CSA). This series may include, but is not limited to: counseling records, court-ordered program placement, and payment for foster care. COV[2.2-5206](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5206/); COV [2.2-5208](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5208/). Series No. 000174 – Retain 3 years after closed; Confidential Destruction. |  |  |  |
| **Compliance Supplemental Worksheets – Program Activities**  **RECORDS MANAGEMENT – ACTIVE FILES** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | 1. Determine whether the CPMT has established records management policy/procedures. Verify the existence of state-required elements. Links to the records management policy are included for reference. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **PROCEDURE 2** | 1. Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **RESOURCES** | [CSA Documentation Inventory](https://csa.virginia.gov/content/doc/CSA_Documentation_Inventory.pdf) | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **Client Specific Records** | |  | | |
| **COV** [**§ 2.2-2648**](http://law.lis.virginia.gov/vacode/2.2-2648/)**(D)(17)** | 1. All client-specific information shall remain confidential, and only non-identifying aggregate demographic, service, and expenditure information shall be made available to the public. |  |  |  |
| **COV** [**§ 2.2-5210**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5210/) | 1. All public agencies that have served a family or treated a child referred to family assessment and planning team shall cooperate with this team. The agency that refers a youth and family to the team shall be responsible for obtaining the consent required to share agency client information with the team. After obtaining the proper consent, all agencies shall promptly deliver, upon request and without charge, such records of services, treatment or education of the family or child as are necessary for a full and informed assessment by the team. |  |  |  |
| 1. Proceedings held to consider the appropriate provision of services and funding for a particular child or family or both who have been referred to the family assessment and planning team and whose case is being assessed by this team or reviewed by the community management and planning team shall be confidential and not open to the public, unless the child and family who are the subjects of the proceeding request, in writing, that it be open. All information about specific children and families obtained by the team members in the discharge of their responsibilities to the team shall be confidential. |  |  |  |
| 1. Utilizing a secure electronic database, the CPMT and the family assessment and planning team shall provide the Office of Children’s Services with client-specific information from the mandatory uniform assessment and information in accordance with subdivision D 11 of § [2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/). |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.5** | 1. Each CPMT shall ensure collection of child-specific documentation to demonstrate compliance with the CSA. Such documentation shall include, at a minimum, the following: |  | | |
| a. Case Manager designation |  |  |  |
| b. Parent consent to release information |  |  |  |
| c. Assessment data, including completed CANS |  |  |  |
| d. Parental co-payment assessed |  |  |  |
| e. Service Plan |  |  |  |
| f. Desired outcomes and time frames |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **RECORDS MANAGEMENT – ACTIVE FILES** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.5** | 1. **Continued** |  | | |
| g. Identification of services |  |  |  |
| h. FAPT or MDT recommendations |  |  |  |
| i. Parent/Guardian participation and consent to service plan |  |  |  |
| j. CPMT authorization |  |  |  |
| k. Signed vendor contract |  |  |  |
| l. Vendor treatment plan(s) |  |  |  |
| m. Vendor progress report(s) |  |  |  |
| n. Utilization review data |  |  |  |
| o. Updated Service Plan(s) |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **DATA ACCESS, INTEGRITY, AND SECURITY** | | | | | |
| **Note: This section includes some compliance criteria not cited in CSA laws, statutes, and/or policies adopted by the SEC. The criteria below are internal control activities established by state agencies (Virginia Information Technology Agency and the Office of Children’s Services) to govern information technology practices that apply to CSA operations. Non-compliance with these criteria represents a significant breakdown of internal controls established to ensure data integrity and security.** | | | | | |
| **PROCEDURE 1** | 1. Determine whether the CPMT has established and/or adopted data security policies and procedures to ensure the integrity and validity of the data collected and that access is limited to authorized personnel. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | |
| **PROCEDURE 2** | 1. Select a sample of CANVaS users and Pool Fund Report Preparers. Review data security activities for verification that policies/procedures/practices are working as intended. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. *Suggestion: Survey users and/or reviewing documentation is recommended to confirm compliance.* | | | | |
| List CANVas Users Selected |  | | | |
| List Pool Fund Report Preparers Selected |  | | | |
|  | | | | | |
| **Reference** | **Description** | | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **Virginia Information Technology Agency**  **IT Information Security Policy**  [**Policy SEC519**](https://www.vita.virginia.gov/media/vitavirginiagov/it-governance/psgs/pdf/SEC519-Information-Security-Policy.pdf)**-01** | * 1. 1.3 Statement of Policy   It is the policy of the COV ([§ 2.2-603(F](https://law.lis.virginia.gov/vacode/title2.2/chapter6/section2.2-603/))) that each Agency Head is responsible for securing the electronic data that is held by the agency and shall comply with the requirements of [§ 2.2-2009](https://law.lis.virginia.gov/vacode/title2.2/chapter20.1/section2.2-2009/). In addition, the Director of every department is responsible for the security of the agency’s electronic information, and for establishing and maintaining an agency information security program compliant with this policy and meets all of the requirements established by COV ITRM Security Standards. | |  | | |
| * 1. 2. COV Information Security Program   The COV Information Security Program establishes the requirements for creating and implementing agency information security policies and procedures to protect COV information from threats, whether internal or external, deliberate or accidental. The COV Information Security Program includes the use of all reasonable information security control measures to:   * Protect COV information against unauthorized access and use; * Maintain the integrity of COV information; * Ensure COV information is available when needed; and * Comply with the appropriate federal or state legislated and regulatory requirements. | |
| **Virginia Information Technology Agency Information Security**  [**Standard SEC501-12.0**](https://www.vita.virginia.gov/media/vitavirginiagov/it-governance/psgs/pdf/SEC501-Information-Security-Standard.pdf) | 2.11. IT System UsersAll users of COV IT systems including, but not limited to, employees and contractors are responsible for the following:  1. Reading and complying with agency information security program requirements. 2. Reporting breaches of IT security, actual or suspected, to their agency management and/or the CISO. 3. Taking reasonable and prudent steps to protect the security of IT systems and data to which they have access. | |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **DATA ACCESS, INTEGRITY, AND SECURITY** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **Virginia Information Technology Agency**  **Cybersecurity Awareness Training**  [**Standard SEC527-1.1**](https://www.vita.virginia.gov/media/vitavirginiagov/it-governance/psgs/pdf/SEC527_Security_Awareness_Training_Standard.pdf)  **OCS Administrative Memo #21-17**  [**Required Information Security and Privacy Awareness Training**](https://csa.virginia.gov/content/doc/Administrative_Memo_21-17.pdf) | 2.2. All IT system users are required to complete IT security awareness and training activities within 30 days of initial employment and by January 31st each year thereafter. |  | | |
| OCS has developed a brief training, "CSA50 – CSA Information Security and Privacy Awareness," . . . It is available in the Virginia Learning Center (<https://covlc.virginia.gov>). All non-exempt users (see definition below) of the CSA Local Government Reporting (LGR) System (including the Child Based Data Reporting System (CBDRS), must complete the training within 30 days of being granted access to the system and annually after that. . . . Failure to complete the training will result in the disabling of the user's account until OCS is notified of the completion of the course. Disabled accounts may lead to an inability to submit required financial submissions and other access to CSA IT systems. |  |  |  |
| Exempt Individuals: Employees of state agencies (including local affiliates such as local departments of social services) completing security awareness training that meets VITA minimum standards ([SEC527 [SEC527-1.1(4 et seq.)]](https://www.vita.virginia.gov/media/vitavirginiagov/it-governance/psgs/pdf/SEC527_Security_Awareness_Training_Standard.pdf)) will meet the requirement through their annual agency training. Exempt users shall indicate completion of their agency training in the designated location in the "Acknowledgment Form" on the Local Government Reporting site. The OCS system will prompt you to acknowledge this annually, after January 1. |  |  |  |
| **OCS Administrative Memo #22-01**  [**CSA system password requirement changes**](https://csa.virginia.gov/content/doc/Administrative_Memo_22-01.pdf) | CSA system users must change passwords every 42 days (90 days for Service Fee Directory users). |  |  |  |
| All Users will utilize a strong password that:Is at least eight (8) characters, maximum length of 15 characters;Contains at least one numeric and one special character;Contains a mixture of at least one uppercase and one lowercase letter; andCannot be reused. |  |  |  |
| Users of OCS information systems:May not share passwords;May change passwords at will, but no more than once every 24 hours; andMust change compromised passwords. |  |  |  |
| Lost, Stolen, or Compromised Passwords.Users must: Immediately change their password, if compromised. |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.6.6** | CANVAS 2.0  The Office of Children’s Services operates a secure software platform, CANVaS 2.0, for the use of all CSA programs across the Commonwealth. |  | | |
| 1. Only employees of local government agencies (local department of social services, court services units, school divisions, community services boards/behavioral health authorities, and CSA offices) may create accounts in CANVaS 2.0 to carry out their job responsibilities in working with children and families. |  |  |  |
| 1. Prior to account creation, all users requesting access shall agree to the terms of the User Agreement required to access the CANVaS 2.0 site. The agreement addresses access, security and confidentiality, and closure (completion) of assessments within a specified time frame. |  |  |  |

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| **Compliance Supplemental Worksheets – Program Activities**  **DATA ACCESS, INTEGRITY, AND SECURITY** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 3.6.7** | 1. Any individual who administers the CANS shall be appropriately certified on the use of the assessment. “Appropriately certified” means the individual has: |  | | |
| * 1. Completed one or more of the Virginia CSA training courses offered on the Praed Foundation CANS training and certification site; |  |  |  |
| * 1. Attained a score of 70 percent or higher on the certification exam; |  |  |  |
| * 1. Received a certificate granted by the Praed Foundation for the approved time frame of one year from the date of certification; and |  |  |  |
| * 1. Administers the CANS only during the approved time frame of his or her certification. |  |  |  |
| 1. CANS completed by individuals who are not appropriately certified are not valid and shall not be used for any purpose, including service planning. |  |  |  |
| 1. Paper CANS score sheets may only be used if the individual administering the CANS is:    1. Appropriately certified, and    2. The information from the score sheet is entered into CANVaS within 60 days by the assessor or an authorized data entry person. |  |  |  |
| 1. Sharing of specific information such as ratings of items on a certification vignette to enable another individual to pass the certification exam is prohibited. Individuals who share or receive such information may lose access to CANVaS 2.0 at the discretion of the Office of Children’s Services. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **POOL FUND CLIENT ELIGIBILITY** | | | | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | | | | |
| **PROCEDURE** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | | | | |
|  | | | | | | | |
| **Reference** | **Description** | **Compliance Status** | | | | | |
| **Full** | | **Partial** | | **Non** | |
| **COV** [**§ 2.2-5212**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5212/) | In order to be eligible for funding for services through the state pool of funds, a youth, or family with a child, shall meet one or more of the criteria specified in subdivisions 1 through 4 and shall be determined through the use of a uniform assessment instrument and process and by policies of the CPMT to have access to these funds. |  | | | | | |
| 1. The child or youth has emotional or behavioral problems that:    1. Have persisted over a significant period of time or, though only in evidence for a short period of time, are of such a critical nature that intervention is warranted;    2. Are significantly disabling and are present in several community settings, such as at home, in school or with peers; and    3. Require services or resources that are unavailable or inaccessible, or that are beyond the normal agency services or routine collaborative processes across agencies, or require coordinated interventions by at least two agencies. |  | |  | |  | |
| 1. The child or youth has emotional or behavior problems, or both, and currently is in, or is at imminent risk of entering, purchased residential care. In addition, the child or youth requires services or resources that are beyond normal agency services or routine collaborative processes across agencies, and requires coordinated services by at least two agencies. |  | |  | |  | |
| 1. The child or youth requires placement for purposes of special education in approved private school educational programs or for transitional services as set forth in subdivision B 6 of § [2.2-5211](https://law.lis.virginia.gov/vacode/2.2-5211/). |  | |  | |  | |
| 1. The child or youth requires foster care services as defined in § [63.2-905](http://law.lis.virginia.gov/vacode/63.2-905/). |  | |  | |  | |
| 1. For purposes of determining eligibility for the state pool of funds, "child" or "youth" means (i) a person younger than 18 years of age or (ii) any individual through 21 years of age who is otherwise eligible for mandated services of the participating state agencies including special education and foster care services. |  | |  | |  | |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211/)**(B)** | The state pool shall consist of funds that serve the target populations identified in subdivisions 1 through 6 in the purchase of residential and nonresidential services for children and youth. References to funding sources and current placement authority for the targeted populations of children and youth are for the purpose of accounting for the funds in the pool. It is not intended that children and youth be categorized by individual funding streams in order to access services. The target population shall be the following: |  | | | | | |
| 1. Children and youth placed for purposes of special education in approved private school educational programs, previously funded by the Department of Education through private tuition assistance; |  | |  | |  | |
| 1. Children and youth with disabilities placed by local social services agencies or the Department of Juvenile Justice in private residential facilities or across jurisdictional lines in private, special education day schools, if the individualized education program indicates such school is the appropriate placement while living in foster homes or child-caring facilities, previously funded by the Department of Education through the Interagency Assistance Fund for Noneducational Placements of Handicapped Children; |  | |  | |  | |
| **Compliance Supplemental Worksheets – Fiscal Activities**  **POOL FUND CLIENT ELIGIBILITY** | | | | | | | |
| **Reference** | **Description** | **Compliance Status** | | | | | |
| **Full** | | **Partial** | | **Non** | |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211/)**(B)** | 1. Children and youth for whom foster care services, as defined by § [63.2-905](http://law.lis.virginia.gov/vacode/63.2-905/), are being provided; |  | |  | |  | |
| 1. Children and youth placed by a juvenile and domestic relations district court, in accordance with the provisions of § [16.1-286](http://law.lis.virginia.gov/vacode/16.1-286/), in a private or locally operated public facility or nonresidential program, or in a community or facility-based treatment program in accordance with the provisions of subsections B or C of § [16.1-284.1](http://law.lis.virginia.gov/vacode/16.1-284.1/); |  | |  | |  | |
| 1. Children and youth committed to the Department of Juvenile Justice and placed by it in a private home or in a public or private facility in accordance with § [66-14](http://law.lis.virginia.gov/vacode/66-14/); and |  | |  | |  | |
| 1. Children and youth previously placed pursuant to subdivision 1 in approved private school educational programs for at least six months who will receive transitional services in a public school setting. State pool funds shall be allocated for no longer than 12 months for transitional services. Local agencies may contract with a private school education program provider to provide transition services in the public school. |  | |  | |  | |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.1.1** | Continued:  **Child in Need of Services (CHINS)**  The FAPT or approved alternative MDT, in accordance with the policies of the CPMT, shall determine that a child is eligible for CSA funding as a “child in need of services” when the FAPT or MDT determines and documents that there are sufficient facts that a child meets all four of the following criteria: | |  | | | | |
| 1. The child meets the statutory definition of a “child in need of services” (COV ). Specifically, “the child’s behavior, conduct or condition presents or results in a serious threat to the well-being and physical safety of the child or the well-being and physical safety of another person if the child is under the age of 14.” This determination of facts shall be made in one of two ways:    * 1. The FAPT and/or approved MDT shall determine that the child’s behavior, conduct, or condition meets this specific statutory definition as is of sufficient duration, severity, disabling and/or self-destructive nature that the child requires services.      2. A court finds that a child falls within these provisions, based on “(i) the conduct complained of must present a clear and substantial danger to the child’s life or health or to the life or health of another person, (ii) the child or his family is in need of treatment, rehabilitation, or services not presently being received, and (iii) the intervention of the court is essential to provide the treatment, rehabilitation, services needed by the child or his family.” (COV [§ 16.1-228](https://law.lis.virginia.gov/vacode/title16.1/chapter11/section16.1-228/)) | |  | |  | |  |
| 1. The child has emotional and/or behavior problems where either: 2. the child’s problems:    * 1. have persisted over a significant period of time or, though only in evidence for a short period of time, are of such a critical nature that intervention is warranted; and      2. are significantly disabling and are present in several community settings, such as at home, in school or with peers; and      3. require services or resources that are unavailable or inaccessible, or that are beyond the normal agency services or routine collaborative processes across agencies, or require coordinated interventions by at least two agencies. | |  | |  | |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities:**  **POOL FUND CLIENT ELIGIBILITY** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.1.1** | 1. Continued:   or   1. the child: is currently in, or at imminent risk of entering, purchased residential care; and    * 1. requires services or resources that are beyond normal agency services or routine collaborative processes across agencies; and      2. requires coordinated services by at least two agencies. |  |  |  |
| 1. The child requires services: 2. to address and resolve the immediate crises that seriously threaten the well-being and physical safety of the child or another person; and 3. to preserve and/or strengthen the family while ensuring the safety of the child and other persons; and 4. the child has been identified by the Team as needing: 5. services to prevent or eliminate the need for foster care placement. Absent these prevention services, foster care is the planned arrangement for the child;   or   1. placement outside of the home through an agreement between the public agency designated by the CPMT and the parents or legal guardians who retain legal custody. A discharge plan for the child to return home shall be included. |  |  |  |
| 1. The goal of the family is to maintain the child at home (for foster care prevention services) or return the child home as soon as appropriate (for parental agreements). |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **EXPENDITURE ELIGIBILITY** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
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| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5209**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5209/) | 1. All youth and families for which CSA-funded treatment services are requested are to be assessed by the family assessment and planning team or an approved collaborative, multidisciplinary team process and shall consider the criteria set out in subdivisions A 1 and A 2 of § [2.2-5212](http://law.lis.virginia.gov/vacode/2.2-5212/). Except for cases involving only the payment of foster care maintenance that shall be at the discretion of the local community policy and management team, cases for which service plans are developed outside of this family assessment and planning team process or approved collaborative, multidisciplinary team process shall not be eligible for state pool funds. |  |  |  |
| 1. Nothing in this section shall prohibit the use of state pool funds for emergency placements, provided the youth are subsequently assessed by the family assessment and planning team or an approved collaborative, multidisciplinary team process within 14 days of admission and the emergency placement is approved at the time of placement. |  |  |  |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(D)** | 1. Other Funding Sources. When a community services board established pursuant to § [37.2-501](http://law.lis.virginia.gov/vacode/37.2-501/), local school division, local social service agency, court service unit, or the Department of Juvenile Justice has referred a child and family to a family assessment and planning team and that team has recommended the proper level of treatment and services needed by that child and family and has determined the child's eligibility for funding for services through the state pool of funds, then the community services board, the local school division, local social services agency, court service unit or Department of Juvenile Justice has met its fiscal responsibility for that child for the services funded through the pool. However, the community services board, the local school division, local social services agency, court service unit or Department of Juvenile Justice shall continue to be responsible for providing services identified in individual family service plans that are within the agency's scope of responsibility and that are funded separately from the state pool. |  |  |  |
| **Alternate Funding Sources – Policy/Guidance References**   * VDSS Title IV-E, Family First Prevention Act Services (FFPSA) and Foster Care Policies * DMAS Medicaid Funding Policies * VDOE Special Education Policies and Regulations   **OCS Website - Guidance:**   * [**Funding Sources for Child Specific Services**](https://csa.virginia.gov/content/doc/Funding_Sources_for_Child_Specific_Services.pdf) * [Maximizing Medicaid Funding for Youth Served under the CSA](https://csa.virginia.gov/content/doc/Maximizing_Medicaid_Funding_for_Youth.pdf) * [Guidance for CSA on Federal KinGap and the State Funded Kinship Subsidy](https://csa.virginia.gov/content/doc/Guidance_for_CSA_on_Federal_KinGap_and_the_State_Funded_Kinship_Subsidy.pdf) * [CSA and Adoption Assistance](https://csa.virginia.gov/content/pdf/CSA_and_Adoption_Assistance.pdf) * [Updated CSA and Fostering Futures Guidance](https://csa.virginia.gov/content/pdf/Updated_CSA_and_Fostering_Futures_Guidance.pdf) * <https://csa.virginia.gov/Resources/AdminMemos> |  | | |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **EXPENDITURE ELIGIBILITY** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/2.2-5211)**(E)** | 1. Court Ordered Services. In any matter properly before a court for which state pool funds are to be accessed, the court shall, prior to final disposition, and pursuant to §§ [2.2-5209](http://law.lis.virginia.gov/vacode/2.2-5209/) and [2.2-5212](http://law.lis.virginia.gov/vacode/2.2-5212/), refer the matter to the CPMT for assessment by a local FAPT authorized by policies of the CPMT for assessment to determine the recommended level of treatment and services needed by the child and family. The FAPT making the assessment shall make a report of the case or forward a copy of the IFSP to the court within 30 days of the court's written referral to the CPMT. The court shall consider the recommendations of the FAPT and the CPMT. If, prior to a final disposition by the court, the court is requested to consider a level of service not identified or recommended in the report submitted by the FAPT, the court shall request the CPMT to submit a second report characterizing comparable levels of service to the requested level of service. Notwithstanding the provisions of this subsection, the court may make any disposition as is authorized or required by law. Services ordered pursuant to a disposition rendered by the court pursuant to this section shall qualify for funding as appropriated under this section. |  |  |  |
| **COV** [**§ 2.2-5211.1**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211.1/) | 1. Certain Restrictions on Reimbursement and Placements of Children in Residential Facilities. Notwithstanding any provision of this chapter to the contrary or any practice or previous decision-making process of the state executive council, Office of Children's Services, state and local advisory team, any community policy and management team, any family assessment and planning team or any other local entity placing children through the Children's Services Act (CSA), the following restrictions shall control: |  | | |
| 1. In the event that any group home or other residential facility in which CSA children reside has its licensure status lowered to provisional as a result of multiple health and safety or human rights violations, all children placed through CSA in such facility shall be assessed as to whether it is in the best interests of each child placed to be removed from the facility and placed in a fully licensed facility and no additional CSA placements shall be made in the provisionally licensed facility until and unless the violations and deficiencies relating to health and safety or human rights that caused the designation as provisional shall be completely remedied and full licensure status restored. |  |  |  |
| 1. Prior to the placement of a child across jurisdictional lines, the family assessment and planning teams shall (i) explore all appropriate community services for the child, (ii) document that no appropriate placement is available in the locality, and (iii) report the rationale for the placement decision to the CPMT. The CPMT shall report annually to the Office of Children's Services on the gaps in the services needed to keep children in the local community and any barriers to the development of those services. |  |  |  |
| 1. Community policy and management teams, family assessment and planning teams or other local entities responsible for CSA placements shall notify the receiving school division whenever a child is placed across jurisdictional lines and identify any children with disabilities and foster care children to facilitate compliance with expedited enrollment and special education requirements. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **EXPENDITURE ELIGIBILITY** | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **Current Appropriation Act**  [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.4.2** | 1. Medicaid Funded Services. CPMTs shall use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under the CSA. 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. |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Sections**  **4.2.4**  **4.2.5** | **Payment for Services and Change of Legal Residence.** The CPMT jurisdiction where the child legally resides shall be responsible for payment for the services identified in the child/family's Individual Family Service Plan for 30 calendar days after the new CPMT receives written notification of the child/family’s residence in the new CPMT locality, except for private special education services as detailed in section 4.2.6 of this policy. Issues of legal residence should be addressed by the legal counsel assigned to the CPMT. If the child/family's legal residence changes, the following shall govern payment for services: |  | | |
| **Change of Legal Residence – Non-Special Education Services**   1. The Former CPMT is responsible for:    1. Providing written notification to the New/Receiving CPMT of the fact that the child/family's residence has changed after obtaining proper consent from the parent or legal guardian(s) of the child.    2. Forwarding the child's/family's IFSP and other FAPT or MDT documents to the New/Receiving CPMT.    3. Informing current service providers of changes in the child/family's residence.    4. Paying for services for 30 calendar days after the New/Receiving CPMT receives written notification of the child/family’s change of residence. |  |  |  |
| 1. The New/Receiving CPMT is responsible for reviewing the current IFSP and adopting (or revising) and implementing the IFSP within 30 calendar days of written receipt of the notification of the child/family’s residence in their locality. |  |  |  |
| 1. CPMT jurisdictions are encouraged to: 2. Keep track of the child/family's residence status. 3. Notify New/Receiving CPMTs as soon as they know of the child/family's pending move to facilitate planning. 4. Work cooperatively to resolve issues related to legal residence. |  |  |  |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Sections**  **4.2.6** | **Change of Legal Residence – Private Education Placements**  Issues of legal residence should be addressed by the legal counsel assigned to the CPMT/Local Education Agency. If the child/family’s legal residence changes, the following shall govern payment for services: |  |  |  |
| 1. The Former CPMT is responsible for:   a. Providing written notification to the New/Receiving CPMT of the fact that the child/family’s residence has changed.  b. Forwarding child’s/family’s IEP/IFSP and other FAPT or MDT documents to the New/Receiving CPMT jurisdiction.  c. Informing private special education service providers of changes in the child/family’s residence.  d. Fund educational services until the student no longer resides within the jurisdiction of the prior Local Education Agency. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **EXPENDITURE ELIGIBILITY** | | | | | |
| **Reference** | **Description** | **Compliance Status** | | | |
| **Full** | | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Sections**  **4.2.6** | 1. CPMTs are encouraged to:   a. Include language in their contracts with private special education providers indicating that they (the local CSA program) are responsible for payment for such services only while the student is a resident of that jurisdiction.  b. Notify, in writing, the parents of students receiving private special education services, that if the parent relocates to another jurisdiction, responsibility for their child’s IEP falls to their new jurisdiction of residence and they need to immediately enroll their child in the Local Education Agency where they now reside. |  |  | |  |
| 1. The New/Receiving CPMT is responsible for:   a. Notifying their Local Education Agency that a student has transferred into their locality.  b. Begin funding educational services when the student resides within the new school division. |  |  | |  |
| 1. CPMT jurisdictions are encouraged to:   a. Keep track of the child/family’s residence status.  b. Notify New/Receiving Community Policy and Management Teams as soon as they know of the child/family’s pending move to facilitate planning.  c. To work cooperatively to resolve issues related to legal residence. |  |  | |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **PARENTAL CONTRIBUTIONS** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE 1** | Determine whether policy and procedures have been established by the CPMT governing parental contributions. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
| **PROCEDURE 2** | Review the individual client file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.5.4** | The CPMT shall consider the following criteria when determining whether parental contributions are appropriate: |  | | |
| 1. Parents of children in out-of-home placements should not be charged a payment for services in addition to the child support order. Instead, for out-of-home care, the CPMT shall implement existing state law and policy requiring referral of such cases to the Division of Child Support Enforcement (DCSE). The non-custodial parents of children in out-of-home care are to be referred to the DCSE for the collection of child support. ([§ 63.2-1910](https://law.lis.virginia.gov/vacode/title63.2/chapter19/section63.2-1910/)) |  |  |  |
| 1. Parents of children in in-home care should be charged a standard parental co-payment based both on the ability of each parent to pay and the cost of the service. Parents and legal guardians of children receiving in-home care are expected contribute financially to the cost of services.    1. Each local government shall develop policies to assess this fee.    2. Local governments are encouraged to assess a fee based on a locally developed scale. |  |  |  |
| **Current Appropriation Act** | 1. Pursuant to subdivision 3 of § [2.2-5206](http://law.lis.virginia.gov/vacode/2.2-5206/), Code of Virginia, Community Policy and Management Teams shall enter into agreements with the parents or legal guardians of children receiving services under the Children's Services Act. The Office of Children's Services shall be a party to any such agreement. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **BUDGET AND MONITORING** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Determine whether the CPMT has mechanisms for budgeting and monitoring the use of CSA fund allocations. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| **COV** [**§ 2.2-5204**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5204/) | 1. The county or city that comprises a single team and the county or city whose designated official serves as the fiscal agent for the team in the case of joint teams shall annually audit the total revenues of the team and its programs. |  |  |  |
| 1. The county or city that comprises a single team and any combination of counties or cities establishing a team shall arrange for the provision of legal services to the team. |  |  |  |
| **COV** [**§ 2.2-5211**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211/)**(C)** | 1. The General Assembly and the governing body of each county and city shall annually appropriate such sums of money as shall be sufficient to (i) provide special education services and foster care services for children and youth identified in subdivisions B 1, B 2, and B 3 and (ii) meet relevant federal mandates for the provision of these services. |  |  |  |
| 1. The community policy and management team shall anticipate to the best of its ability the number of children and youth for whom such services will be required and reserve funds from its state pool allocation to meet these needs. |  |  |  |
| 1. Nothing in this section prohibits local governments from requiring parental or legal financial contributions, where not specifically prohibited by federal or state law or regulation, utilizing a standard sliding fee scale based upon ability to pay, as provided in the appropriation act. |  |  |  |
| **Current Appropriation Act,** | 1. All localities are required to appropriate a local match for the base year funding consisting of the actual aggregate local match rate based on actual total 1997 program expenditures for the CSA. This local match rate shall also apply to all reimbursements from the state pool of funds in this Item and carryforward expenditures submitted prior to September 30 each year for the preceding fiscal year, including administrative reimbursements under paragraph C.4. in this Item. |  |  |  |
| **COV** [**§ 2.2-5213**](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5213/)**(B)** | 1. **State Trust Fund.** There is established a state trust fund with funds appropriated by the General Assembly. The fund shall consist of moneys from the state general fund, federal grants, and private foundations. Proposals for requesting these funds shall be made by community policy and management teams to the Office of Children's Services. The Office of Children's Services shall make recommendations on the proposals it receives to the Council, which shall award the grants to the community teams in accordance with the policies developed under the authority of § [2.2-5202](http://law.lis.virginia.gov/vacode/2.2-5202/). | *Note: For the current legislative biennium, the Virginia General Assembly has not appropriated any funds to the State Trust Fund to fund requested grant proposals.* | | |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **“CARVE-OUT” OF ALLOCATION** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Assess compliance with policies adopted by the State Executive Council (SEC) governing the “carve-out” of allocations for developing new/expanded services. Document an explanation for any observations of partial or non-compliance and include it as an attachment to this document. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.3** | *Note and Fiscal Impact: Implementation of this policy has the potential fiscal impact of $2,000,000. Implementation of the policy shall therefore be dependent upon appropriation of necessary funds.* |  | | |
| In any 12-month period two or more localities may submit a proposal to allocate (“carve-out”) a portion of their state and local pool fund allocation to defray one-time program start-up costs for new or expanded CSA services which are designed to meet the needs of children and families and to maintain children in their home community. | Check box and skip questions 1 through 4 if the locality does not have a “carve out allocation” | | |
| 1. The allocation shall not exceed, per jurisdiction, $100,000 or 5% of their allocation in the fiscal year of application, whichever is smaller. |  |  |  |
| 1. Programs for which these funds may be applied must be designed to:    1. Provide CSA services for which a demonstrated need exists in the locality, based on assessment using the Service Gap Survey distributed by the OCS and align with the goals of the Commonwealth; and    2. Become financially self-sustaining beyond the start-up phase. Services designed to be supported through “fee for service” arrangements may be considered financially self-sustaining. |  |  |  |
| 1. The proposal for use of funds shall be submitted to and approved by the OCS and will include, but not be limited to:    1. Description of the service,    2. Support for the need,    3. Cost assessment,    4. Evaluation of public/private collaborations,    5. Information related to financial sustainability of the program, and    6. Expected outcomes and mechanism for providing program evaluation. |  |  |  |
| 1. All fiscal accountability requirements of CSA shall be applicable to use of funds. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **ADMINISTRATIVE FUNDS** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | For the current and prior fiscal year, review documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.5.3**  **OCS Administrative Memo 24-05**  [**FY2025 Administrative Budget Plan Funding**](https://csa.virginia.gov/content/doc/Administrative_Memo_24_05.pdf) | 1. To receive administrative funds, each locality is required to appropriate a local match based on the match rate used in the pool formula. |  |  |  |
| 1. Each year the CPMT must submit to the State Fiscal Agent budget plans for using administrative funds (state and local combined). The local government should submit the administrative plan to the state fiscal agent by June 15th of the fiscal year to ensure payment.   (Pursuant to the procedures described in OCS Administrative Memo 24-05 and the accompanying step by step guide.) |  |  |  |
| 1. If, during the course of the year, the Community Policy and Management Team elects to use its administrative funds in a manner other than proposed in the Budget Plan, it may do so without amending the plan, provided the funds are expended for administrative and coordinating expenses or direct services to eligible youth and families. The decision on specific use of administrative funds rests with the Community Policy and Management Team. |  |  |  |
| 1. The local fiscal agent must account for CSA administrative expenditures such that they are clearly identifiable as CSA administrative expenditures. |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **POOL FUND REIMBURSEMENTS** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Examine all expenditure reimbursement requests processed during the selected audit period (e.g., *most recent 12 months)*. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.5.2.4** | 1. The Office of Children’s Services will not accept final claims for reimbursements for prior year payments after September 30 of the next fiscal year. |  |  |  |
| 1. Localities may submit requests for reimbursement to the Office of Children’s Services monthly but must report at least every quarter. |  |  |  |
| 1. A reimbursement report shall be generated and submitted for each calendar month, even if it indicates no expenditures were made during that month. |  |  |  |
| 1. A locality may request a waiver to the September 30 final year-end report requirement specified in 4.5.2.4.A. by:    1. Submitting a written request to the OCS Executive Director before or after the September 30 cutoff date.    2. The OCS Executive Director will grant or decline a waiver based on their determination that “good cause” exists.    3. If a locality does not agree with the OCS Executive Director's determination of "good cause," they may request an appeal of the decision through the State Executive Council's dispute resolution policy (Policy 3.4). |  |  |  |
| 1. Localities shall adopt and implement procedures to reconcile actual CSA reimbursements against expected reimbursements using local general ledgers and the Pool Fund Distribution History, the Pool Transaction History, and other available reports on the CSA website (www.csa.virginia.gov). |  |  |  |
| 1. Localities shall adopt procedures to address position vacancies, including temporary unavailability, in the roles of Report Preparer and/or Fiscal Agent that impact the timely submission of the CSA reimbursement requests |  |  |  |

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| **Compliance Supplemental Worksheets – Fiscal Activities**  **SUPPLEMENTAL REQUESTS** | | | | |
| **Note: This document lists only the state-level compliance criteria. Local CPMTs are encouraged to review compliance with the locally established policies and procedures for administering local CSA programs.** | | | | |
| **PROCEDURE** | Examine all supplemental requests processed during the selected audit period *(e.g. most recent 12 months)*. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Document an explanation for any observations of partial or non-compliance. | | | |
|  | | | | |
| **Reference** | **Description** | **Compliance Status** | | |
| **Full** | **Partial** | **Non** |
| [**SEC Policy Manual and CSA User Guide**](http://www.csa.virginia.gov/Resources/PolicyGuides)  **Policy Manual,**  **Section 4.5.5** | A CPMT may request a supplemental allocation at any time before the close of the program year. In order to be approved for a supplemental allocation, the CPMT must demonstrate each of the following: |  | | |
| 1. A known cost has been, or will be, incurred for a specific child or children in the MANDATED TARGET population. |  |  |  |
| 1. Any amount of the allocation for the non-mandated population (NON-MANDATED TARGET + OTHER ELIGIBLE in the Allocation Plan) which, a) exceeds the protection level established for that year and b) is not yet expended or obligated, may be re-allocated for use with the MANDATED TARGET population. For this purpose, obligations are unpaid purchase orders, contracts, or any other agreements, which bind the CPMT to pay for goods or services to be delivered to specific children, at a specified cost, over a defined period of time. |  |  |  |
| 1. Localities requesting supplemental funds must also demonstrate that they are in compliance with the provisions of CSA including, but not limited to, instituting and operating effective cost control measures as recommended by the Council. |  |  |  |
| 1. Requests for supplemental allocations are filed electronically via the CSA website: <http://www.csa.virginia.gov>. |  |  |  |
| 1. It is no longer necessary to submit a hard copy of the Request for Supplemental Allocation form to the OCS; however, a hard copy containing all necessary signatures should be maintained by the local CPMT. |  |  |  |
| 1. Localities whose mandated expenditures have increased more than 10% over the previous year’s total mandated expenditures will be required to complete the “Comment” portion of the Supplemental Allocation Request form. (NOTE: Any locality submitting a Request for Supplemental Allocation may provide comments in this area that they feel will assist OCS in processing their request.) These comments should provide additional information related to locality trends that are affecting CSA costs. It is not necessary to restate the financial information already submitted in other portions of the report. |  |  |  |

**SECTION V: COMPLIANCE**

**LOCAL CPMT COMPLIANCE ASSESSMENT WORKSHEET**

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| A purpose of the Children’s Services Act is to: "1. Ensure that services and funding are consistent with the Commonwealth's policies of preserving families and providing appropriate services in the least restrictive environment, while protecting the welfare of children and maintaining the safety of the public." Code of Virginia Section [§ 2.2-2648](http://law.lis.virginia.gov/vacode/2.2-2648/)(D)(20) states that the Council shall “deny state funding to a locality, in accordance with subdivision 19, where the CPMT fails to provide services that comply with the Children’s Services Act ([§ 2.2-5200](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5200/) et seq.), any other state law or policy, or any federal law pertaining to the provision of any service funded in accordance with [§ 2.2-5211](http://law.lis.virginia.gov/vacode/title2.2/chapter52/section2.2-5211/)." | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| **PROGRAM ACTIVITIES** |  | | | | |
| 1. Review program activities of the selected audit period *(e.g. most recent 12 months)* to assess compliance with local CPMT policies and procedures that govern CSA services. |  |  |  |  |  |
| 1. Document the assessment |  |  |  |  |  |
| 1. Itemize deficiencies and the corresponding plan of action. |  |  |  |  |  |
| 1. Document CPMT discussion of deficiencies and plan of action. |  |  |  |  |  |
| **FISCAL ACTIVITIES** |  | | | | |
| 1. Review fiscal activities of the selected audit period *(e.g. most recent 12 months)* to assess compliance with local CPMT policies and procedures governing CSA pool fund expenditures. |  |  |  |  |  |
| 1. Document the assessment. |  |  |  |  |  |
| 1. Itemize deficiencies and the corresponding plan of action. |  |  |  |  |  |
| 1. Document CPMT discussion of deficiencies and plan of action. |  |  |  |  |  |

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| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION VI: QUALITY IMPROVEMENT**

* Quality Improvement Plan Worksheet
* Quality Improvement Plan Worksheet Supplement

**SECTION VI: QUALITY IMPROVEMENT**

**QUALITY IMPROVEMENT PLAN WORKSHEET**

|  |  |  |  |  |  |
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| Significant weaknesses in internal control and incidences of non-compliance must be documented, and a quality improvement plan must be developed. A quality improvement plan includes the following elements, at minimum:   * Summary description of the deficiency. * Description of the quality improvement action to be taken; actions taken should be measurable. * The target date for completing quality improvement action should be within the next 12 months following the date of the self-assessment. * Personnel responsible for implementing quality improvement action and for monitoring progress. | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| 1. Review worksheets completed in Sections I through V. Prepare a summary listing internal control weaknesses and/or non-compliance observations identified. |  |  |  |  |  |
| 1. Prepare a quality improvement plan to address the deficiencies identified. The Quality Improvement Plan Worksheet Supplement or a reasonable facsimile may be used. |  |  |  |  |  |
| 1. Notify the Office of Children’s Services of control weaknesses and non-compliance deficiencies, accompanied by a quality improvement plan. |  |  |  |  |  |
| 1. Verify that quality improvement action is implemented timely (in accordance with the target dates established). |  |  |  |  |  |
| 1. Provide periodic reports to the CPMT and the OCS regarding quality improvement status. |  |  |  |  |  |

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| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION VI: QUALITY IMPROVEMENT PLAN**

**QUALITY IMPROVEMENT PLAN WORKSHEET SUPPLEMENT**

**Instructions: A separate worksheet should be completed for each deficiency identified in the assessment process.**

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| **QUALITY IMPROVEMENT PLAN DETAILS** | | | | | | |
| **Observation Number/Description:**  Click here to enter text. | | | | | | |
| **Observation Type**  *Click all*  *that may apply* | **Quality Improvement Task** | **Responsible Party** | **Target Date** | **Self-Reporting Status** | | |
| In Progress | Completed | Date  Completed |
| Non-Compliance  Internal Control Weakness  Best Practice/ Internal Control Enhancement | Click here to enter text. | Click here to enter text. | Click here to enter a date. |  |  | Click here to enter a date. |
| Please check if attachments are included. | | | | | | |
| If quality improvement task is not complete, please explain:  Click here to enter text. | | | | | | |

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| **QUALITY IMPROVEMENT PLAN APPROVAL** | | |
| **Signature:** | **Title:** | **Date:** Click here to enter a date. |
| **Print Name:** |

**SECTION VII: CERTIFICATION**

* Certification Worksheet
* Statement of Acknowledgement and Certification

**SECTION VII: CERTIFICATION**

**CERTIFICATION WORKSHEET**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| The CSA Self-Assessment Workbook provides guidance for establishing and assessing locally administered programs' compliance and internal controls to manage risk and maintain accountability more effectively. The governing CPMT will certify to the Office of Children’s Services that:   1. They have evaluated their local CSA programs to ensure that they are accomplishing the objectives of the Children’s Services Act and that the decisions of the State Executive Council (SEC) are implemented accordingly. 2. They have established, maintained, and evaluated their programs’ internal control framework and compliance with applicable statutes, laws, policies, procedures, etc. | | | | | |
|  | | | | | |
| **Task Description** | **Describe activity performed**  **to validate/verify**  **assessment criteria.**  *(You may attach additional sheets if needed)* | **Is there evidence to demonstrate the achievement of the criteria?**  *(You may attach additional sheets if needed)* | | | |
| Y | N | N/A | Comments |
| 1. Complete the Statement of Acknowledgement and Certification. |  |  |  |  |  |
| 1. Ensure that the quality improvement plan is attached, if applicable. |  |  |  |  |  |
| 1. Forward Certification and accompanying quality improvement plan (if any) to the Office of Children’s Services by the established due date per the scheduled audit plan. |  |  |  |  |  |

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| **Completed By:** |  | **Date:** | Click here to enter a date. |

**SECTION VII: CERTIFICATION**

**STATEMENT OF ACKNOWLEDGEMENT AND CERTIFICATION**

|  |  |  |  |
| --- | --- | --- | --- |
| The       Community Policy and Management Team (CPMT) is responsible for establishing and maintaining an effective system of internal control to ensure compliance with the Children’s Services Act (CSA). The       CPMT has completed its control and compliance self-assessment for the 12-month period starting       and ending      .  The basis for these conclusions relates to our assessment of compliance and the internal controls operating within the       CPMT. Based on the results of this evaluation, the       CPMT can provide reasonable assurance that: | | | |
| ***Important Notes:***   * ***Non-compliance is significant when demonstrated activities/transactions, subject to the provision of federal and/or state laws and regulations (i.e. Children’s Services Act) and/or policies adopted by the State Executive Council or partnering state agencies, do not meet the established criteria.*** * ***An adequate system of internal controls is contingent upon the consistent and proper application of established policies and procedures affecting CSA-funded activities, as well as monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organization's internal control structure are considered significant.*** | | | |
|  | No non-compliance observations and/or internal control weaknesses were identified. | | |
|  | We have identified instances of non-compliance and/or internal control weaknesses that were not significant. Observed non-compliance and/or breakdowns in established controls were isolated, infrequent, and/or immaterial.  ( Non-compliance;  Internal Controls;  Both)  The       CPMT is providing assurance that they will address these minor deficiencies by     , 20     . | | |
|  | Significant non-compliance observations and/or internal control weaknesses were identified. The observed instances of non-compliance and/or breakdowns in established controls were recurring, frequent, and/or material.  ( Non-compliance;  Internal Controls;  Both)  This certification includes a list of the deficiencies and corresponding Quality Improvement Plan(s). The CPMT is providing assurance that they will address these significant deficiencies by     , 20     . | | |
| **Signature** | |  | **Date:** |
| **Print Name** | |  | |
| **Title** | | **Community Policy & Management Team Chairperson** | |

**FOR ASSISTANCE USING THIS WORKBOOK, CONTACT THE OFFICE OF CHILDREN’S SERVICES:**

|  |  |
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| **CONTACT INFORMATION** | |
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