

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

***Spotsylvania County
Self-Assessment Validation***

Final Audit Report No. 15-2022

July 12, 2022



Office of Children's Services
Empowering communities to serve youth

Report Disclaimer

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



COMMONWEALTH of VIRGINIA

Scott Reizer, M.S.
Executive Director

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

July 12, 2022

Vincent Butaitis, Spotsylvania County CPMT Chair
Department of Juvenile Justice
601 Caroline Street
Fredericksburg, VA 22401

RE: Spotsylvania County CSA Program Self-Assessment Validation
Final Report, File No. 15-2022

Dear Mr. Butaitis,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2022, the Spotsylvania County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Spotsylvania County CSA program completed February 1, 2022 and covering the period January 1, 2021 through December 31, 2021, our independent validation:

Concurs Partially Concurs Does Not Concur

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

The Spotsylvania County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. A summary of non-compliance and/or internal control weaknesses reported by the CPMT are included as Attachment A to this report. However, validation procedures identified deficiencies indicating non-compliance in the local CSA program. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics are detailed on pages 2-3.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. During the period of review, expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State and local CSA policies and procedures were not met. Foster care maintenance costs totaling \$3,171.71 (state and local share) were funded by CSA on behalf of three (3) title IV-E eligible clients. Code of Virginia (COV) [§ 2.2-5211](#) states “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.” The three (3) clients were identified through the review of reports issued by the Virginia Department of Social Services (VDSS) Quality Assurance and Accountability (QAA) team.

Prior to completing the audit, Spotsylvania County DSS processed an adjustment to reimburse CSA for the identified IV-E eligible foster care maintenance expenditures. The amount reimbursed did not include the share of the initial payments funded by CSA, discovered during their internal review, that were determined as inadvertent overpayments to providers (i.e. foster parents and/or licensed child placing agencies) . Thus, the state share due to OCS reflected in the table below represents an overpayment from the provider and not Title IV_E.

Spotsylvania County					
Clients	Total Questioned Cost	IV-E Adjustment/Refund	Provider Overpayment	State Share	Service Period
A	\$2,375.69	\$2,144.22	\$231.47	\$125.27	September 2021 - December 2021
B	\$772.31	\$772.31	\$0	\$0	September 2021 - October 2021
C	\$23.71	\$0	\$23.71	\$12.83	July 2021
Total Due to CSA				\$138.10	

2. The membership of the CPMT and the Family Assessment and Planning Team (FAPT) does not meet the membership requirements as established by the Code of Virginia (COV) [§ 2.2-5205](#), [§ 2.2-5207](#) and local policy.
 - a. The CPMT private provider representative role was vacated in November 2021. At the request of the CPMT Chair, the vacancy was posted on the County’s website. However, the announcement on the County’s website was an old posting stating was applications would be accepted through July 29, 2020. Because of the expiration, interested applicants may not have applied, assuming that the volunteer position had been filled. During this recruitment period, a private provider representative actively served on the FAPT. Whereas private provider participation is optional for FAPT, the role is required for CPMT.

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS CONTINUES

- b. The composition of members serving on the two (2) FAPTs does not include a parent representative as required by the statute. CPMT minutes do not evidence any recruitment activities to secure parent representatives during the audit period. Nor was there any advertisement of the parent representative vacancies on the County's website. Service planning is contingent upon participation by all members.

The absence of the private provider and parent representatives from the teams responsible for service planning and funding authorization could potentially impede the achievement of the highest degree of multi-disciplinary collaboration, ensuring family advocacy by leveraging the public-private partnership.

RECOMMENDATIONS

1. Prior to authorizing funding, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding, i.e., meeting all federal and state requirements. Specifically, ensuring that expenditures are not eligible for other funding sources such as title IV-E. Documentation should be maintained as justification for CPMT funding decisions.
2. As a part of the CPMT's quality assurance review and monitoring efforts, the CPMT should
 - a. review title IV-E QAA Review Reports
 - b. track CSA funded cases pending title IV-E eligibility determination, and
 - c. confirm and ensure reimbursement of CSA pool funds for foster care maintenance cost, where appropriate.
3. The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, including whether the CPMT agrees with the observations regarding questioned costs. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director based on SEC Policy 4.7, *Response to Audit Findings* of whether the identified actions are acceptable or any additional actions that may be required.
4. The CPMT should ensure that all CPMT and FAPT positions required by the COV are filled. The CPMT should actively and continuously perform recruitment activities when vacancies occur. In addition, the CPMT should document their recruitment efforts in the CPMT meeting minutes. To immediately address non-compliance regarding CPMT membership, the CPMT should consider elevating the private provider representative from FAPT to CPMT.

CLIENT RESPONSE

"Concur"

Mr. Vincent Butaitis, Spotsylvania County CPMT Chair
CSA Program Self-Assessment Validation

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The Office of Children's Services respectfully requests that you submit a quality improvement plan (QIP) to address the observation outlined in this report no later than 30 days from receipt of this report. We ask that you notify this office as QIP tasks identified to address significant observations are completed. OCS will conduct a follow-up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Spotsylvania County Community Policy and Management Team and related CSA staff for their contributions to completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Erica Mann, Former CSA Program Administrator, and during our review. Ms. Mann's efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Annette E. Larkin, MBA
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Ed Petrovitch, Spotsylvania County Administrator
Rebecca R. Forry, CPMT Fiscal Agent
Erica Mann, Former CSA Program Administrator

Attachment



CSA Self-Assessment Validation
Spotsylvania County CSA Program Self-Assessment Validation
Summary of Self-Reported Non-Compliance and/or (Non-significant) Internal Control Weakness

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date
1. Completion of discharge CANS are required only when a child's CSA case is closed. 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. Report outcomes on quarterly basis and report findings to Teams.	SEC Policy Manual and CSA User Guide Policy Manual, Section 3.6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Target Date 7/1/22
2. Ensure Statement of Economic Interest Forms are filed by February 1 for applicable public officials serving as CPMT/FAPT members and local CSA staff.	COV § 2.2-3117 SEC Policy Manual and CSA User Guide Administrative Memo #18-02	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Completed 2/1/22
3. CPMT has established performance measures for processes and receives periodic reports of results against those measures by completing Performance Measures Plan to be reviewed quarterly.	COV § 2.2-5206 SEC Policy Manual and CSA User Guide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Target Date 7/1/22
4. Outside parties understand the program's ethical and behavioral standards and expectations regarding dealings with the program by posting Code of Ethics and Family Guide on County Website	ARMICS Governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Completed 4/1/22
5. Implement established Training Plan for CSA staff and new members and review quarterly.	ARMICS Training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Target Date 4/1/22
6. Add to existing calendar the CPMT required actions according to due date, which includes: Confidential Statements, Risk Assessments, Case Manager Survey, Review of IT plan	ARMICS Control Activities	<input type="checkbox"/>	<input type="checkbox"/>	Completed 4/1/22