



COMMONWEALTH of VIRGINIA

OFFICE OF COMPREHENSIVE SERVICES

Administering the Comprehensive Services Act for At-Risk Youth and Families

Susan Cumbia Clare, M.Ed.
Executive Director

June 3, 2015

Randi Knights, CPMT Chair
City of Manassas Park CSA Program
One Park Center Court - City Hall
Manassas Park, Virginia 20111

RE: City of Manassas Park Comprehensive Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 33-2013

Dear Ms. Knights,

In accordance with the Office of Comprehensive Service's (OCS) Audit Plan for Fiscal Years 2013-2015, the City of Manassas Park Community Policy and Management Team (CPMT) has completed and submitted the results of the self assessment audit of your local CSA Program by the established due date of June 30, 2013. An on-site visit was scheduled and conducted by our Program Compliance Specialist supervised by the OCS Program Audit Manager on January 5, 2015 to perform the independent validation phase of the process.

Based on the review and examination of the self assessment workbook and supporting documentation provided by the City of Manassas Park CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the City of Manassas Park 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 Manassas Park CSA program. The explanation for our assessment results are as follows:

The City of Manassas Park Community Policy and Management Team concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment indicated that there were major deficiencies¹ indicating non-compliance and internal control weaknesses in the local CSA programs. Non-compliance with the statutory requirements of the Comprehensive Services Act (CSA) is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. Specifics pertaining to the Manassas Park CSA Program are detailed on page 2 of this report.

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

Significant Non-compliance Observations	
■	<p>The Manassas Park CSA program does not have a complete and comprehensive policy and procedure manual to guide the operation of their programs. The CPMT has not documented policies and/or procedure in the existing manual to address intensive care coordination (ICC), records management, purchase of services authorizations, and bids on development for new services.</p> <p><i>Criteria: COV §2.2-5206 CPMT Powers and Duties, Items 1, 2, 7, and 17; CSA Policy Manual Section 3.5 Recrs Management Toolkit CPMT Guidelines for Records Management</i></p>
■	<p>Statement of Economic Interest forms were not completed and updated annually as required by persons serving on the CPMT or Family Assessment and Planning Team (FAPT) that do not represent a public agency. CSA staff indicated that they were acting on a legal opinion provided by local counsel that the requirement was not applicable to CPMT. However, the interpretation provided erred in that the Comprehensive Services Act does not exempt private providers, parent representatives, and other non-government officials that may serve on CPMT or FAPT.</p> <p><i>Criteria: COV §2.2-5205 CPMT Membership; Immunity from Liability, Paragraph 4; COV §2.2-5207 FAPT Membership; Immunity from Liability, Paragraph 2</i></p>
■	<p>Manassas Park's CSA Program has not complied with the requirements for membership of the CPMT due to the absence of designated parent representatives for CPMT and FAPT.</p> <p><i>Criteria: COV §2.2-5205 CPMT Membership; COV §2.2-5207 FAPT Membership</i></p>
■	<p>Coordination of long-range community wide planning in the development of services and resources has not been formally documented.</p> <p><i>Criteria: COV §2.2-5206 CPMT Powers and Duties, Paragraph 1, Item 4</i></p>

Significant Internal Control Weaknesses	
■	<p>The utilization review/utilization management plan (UM/UR) adopted by the Manassas Park CPMT is outdated. The document contains references to outdated assessment tools (i.e. CAFAS) and a Levels of Needs Chart that is no longer accessible. Further, the UM/UR plan does not explicitly establish a frequency schedule for conducting utilization reviews. Based on the outdated information contained in the UM/UR plan provided, the document has not been updated since circa 2009 and prior to the revised UM Guidelines published in June 2009.</p> <p><i>Criteria: COV §2.2-5206 CPMT Powers and Duties, Paragraph 1, Items 6 and 13; 2011 Appropriations Act, Chapter 890, Item 274.B.3; CSA Policy Manual Section 8.1; Virginia Department of Accounts (DOA), Agency Risk Management and Internal Control Standards (ARMICS), Control Environment, Oversight by the Agency's Governing Board.</i></p>
■	<p>The Manassas Park CPMT has not developed and implemented a quality improvement plan to address deficiencies identified during the self-assessment process.</p> <p><i>Criteria: COV §2.2-5206 CPMT Powers and Duties, Paragraph 1, Item 6; DOA ARMICS, Monitoring</i></p>

Recommendations:	
■	<p>In accordance with CSA statutory requirements and the policies adopted by the State Executive Council, the CPMT should be develop, formally adopt, and incorporate in the existing policy manual policies and procedures to govern ICC, records management, purchase of services authorizations, and bids on development for new services.</p>
■	<p>The Manassas Park CPMT should ensure that applicable parties immediately complete the statement of economic interest forms and ensure that the forms are updated annually as required by the Code of Virginia, Conflict of Interest Act.</p>

Recommendations:	
▪	The Manassas Park CPMT should actively recruit parent representatives to serve on CPMT and FAPT.
▪	The Manassas Park CPMT should immediately update their UM/UR plan to reflect current practices and procedures, including but not limited to the references pertaining to the mandatory, uniform assessment instrument approved by the State Executive Council and frequency of utilization reviews.
▪	Manassas Park CPMT should immediately document and implement a quality improvement plan to address non-compliance observations and internal control weaknesses identified by the CPMT during the self-assessment evaluation, as well, as those identified through the validation process.

CLIENT COMMENT:

“Manassas Park CPMT is in receipt of the CSA Self-Assessment. Quality Improvement Plans will be drafted and submitted. Thank you for supporting our Agency/Team.”

Randi Knights
MPDSS Acting Director
CPMT Chairperson

The Office of Comprehensive Services respectfully requests that you submit a quality improvement plan to address the observations outlined on pages 2-3 no later than 30 days from receipt of this report. You may use the template included in the CSA Self-Assessment Workbook. The workbook may be accessed via: [http://www.csa.virginia.gov/html/Program Audit/Program Audits information.cfm](http://www.csa.virginia.gov/html/Program%20Audit/Program%20Audits%20information.cfm)

We would like to thank the Manassas Park CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Natasha Dewer and Judy Donley, CSA Coordinators during our on-site visit. Their combined 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,


Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Susan C. Clare, Executive Director
Kimberly L. Alexander, Manassas Park City Manager
Karen Etheridge, CSA Coordinator
Chloe Carter, Program Compliance Specialist