

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

Culpeper County

Audit Report No. 001-2024

April 8, 2024



Office of Children's Services

Empowering communities to serve youth

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EXECUTIVE SUMMARY

The Office of Children's Services (OCS) has completed an audit of the Culpeper County CSA Program. The Culpeper County CSA Program provided services and funding to 128 eligible youth and families in fiscal year (FY) 2023. The audit included reviewing and evaluating management oversight, operational, and fiscal practices. Based upon established statewide Children's Services Act (CSA) performance measures reported for FY 2023, significant achievements for the Culpeper County CSA Program were:

- Seventy-nine percent (79%) of youth in foster care are in a family-based foster care setting, exceeding the state-wide average by three percent (3%).
- Ninety-one (91%) percent of youth and families served by Culpeper County received only community-based services.

However, additional opportunities exist to improve quality in other CSA program areas. The audit concluded that there was a deficiency that could adversely affect the effectiveness and efficient use of resources and compliance with statutory requirements. While internal controls addressing CSA service planning and records management activities were established, they were not always functioning as intended. Key data elements described in Code of Virginia §2.2-5208 and CSA Policy 3.5 Records Management were omitted from the Individual and Family Services Plans (IFSPs) of 80% (8/10) of the client records examined. Specific data elements not recorded:

- measurable goals/objectives with target dates necessary for effective utilization review of services and outcomes,
- evidence of parent/guardian participation (including foster parents) participation and consent to service plan; and
- discharge plan for returning the youth to their home, relative's home, family-like setting, or community at the earliest appropriate time that addresses their needs.

The Office of Children's Services appreciates the cooperation and assistance provided on behalf of the CPMT and other CSA staff. The body of the full report includes formal responses from the CPMT to the reported audit observations.



Stephanie S. Bacote, CIGA
Program Audit Manager

INTRODUCTION

The Office of Children's Services has completed a financial/compliance audit of the Culpeper County CSA Program. The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing (Standards). The standards require planning and performance of the audit pursuant to stated audit objectives to provide a reasonable basis for audit observations, recommendations, and conclusions. The audit was completed on April 4, 2024, and covered the period from December 1, 2022 through November 30, 2023.

The objectives of the audit were:

- To determine whether adequate internal controls have been established and implemented over CSA expenditures.
- To determine the adequacy of training and technical assistance by assessing local government CSA staff knowledge and proficiency in implementing local CSA programs.
- To assess whether operations have maintained high standards for sound fiscal accountability and ensured responsible use of taxpayer funds by evaluating fiscal activities of the local CSA program.
- To assess the level of coordination among local government CSA stakeholders and efforts to improve CSA performance by evaluating the local CSA program's operational and utilization review practices.
- Assess the implementation of quality improvement plans addressing prior audit observations reported by OCS and/or identified in the prior self-assessment evaluation completed by the Culpeper County CPMT. The audit report date was August 15, 2019.

The audit scope included all youth and their families who received CSA-funded services during the audit period. Audit procedures included reviews of relevant laws, policies, procedures, and regulations; interviews with various CSA stakeholders; flowcharts of operational and fiscal processes; various tests and examination of records; and other audit procedures deemed necessary to meet the audit objectives.

BACKGROUND

Established in 1749, Culpeper County is located along the borderlands of the northern and central region of the Commonwealth of Virginia. According to the U.S. Census Bureau Quick Facts 2022, the estimated population was 54,381. The median household income from 2018-2022 was \$92,359.

The Children's Services Act (CSA) is a law enacted in 1993 that establishes a single state pool of funds to purchase services for eligible youth and their families. The state funds, combined with local community funds, are managed by a local interagency team, the Community Policy and Management Team (CPMT), that plans and oversees services to youth. Culpeper County CPMT is supported by a Family Assessment and Planning Team (FAPT) responsible for recommending appropriate services to eligible children and families. Administrative services are managed through the local CSA office staffed by the CSA Coordinator and the Utilization Management Coordinator. Expenditure demographics for fiscal years 2020 to 2024 are depicted below.

Source: CSA Data and Outcomes Dashboard

(Web link: [Data and Outcomes Dashboard \(CQI\)](#))

At-A-Glance

	2020	2021	2022	2023
Distinct Child Count	173	142	116	128
Net Expenditures	\$3.0M	\$2.7M	\$2.1M	\$2.3M
Local Net Match	\$1.0M	\$0.9M	\$0.7M	\$0.8M
Average Expenditure	\$17,539	\$19,095	\$18,069	\$18,325
Base Match Rate	0.3767	0.3767	0.3767	0.3767
Effective Match Rate	0.3297	0.3342	0.3356	0.3411

CQI dashboard data consists of information submitted by individual Virginia localities for youth receiving CSA-funded services in the reporting period. Statewide data was updated through 02/20/24 of the current program year.

OBSERVATIONS AND RECOMMENDATIONS

PROGRAM ACTIVITIES

Observation:

Criteria:

Compliance and Internal Control

CSA records of ten (10) client were examined to confirm that required documentation was maintained to support and validate Family Assessment and Planning Team (FAPT) service planning recommendations and Community Policy and Management Team (CPMT) funding decisions. The results of the review noted key data elements described in Code of Virginia §2.2-5208 and CSA Policy 3.5 Records Management were omitted from the Individual and Family Services Plans (IFSPs) of 80% (8/10) of the client records examined. Specific data elements not recorded:

1. measurable goals/objectives with target dates necessary for effective utilization review of services and outcomes,
2. evidence of parent/guardian participation (including foster parents) participation and consent to service plan; and
3. discharge plan for returning the youth to their home, relative's home, family-like setting, or community at the earliest appropriate time that addresses their needs.

The exceptions highlighted are critical to evidencing the appropriateness of services and compliance with CSA funding requirements.

Recommendations:

1. The FAPT should ensure the relevant data points are clearly and consistently documented in the approved service plan.
2. Periodic case file reviews should be performed at least annually, by someone independent of FAPT, to establish quality control of client records and ensure compliance with CSA statutory requirements. Results should be compiled and shared with FAPT and CPMT to ensure deficiencies are addressed accordingly.

Client Comment:

See attachment.

CONCLUSION

This audit concluded that there was a deficiency in internal controls that could affect compliance with statutory requirements. An exit conference was conducted on March 22, 2024, to present the audit results to the Culpeper County CPMT. Persons in attendance representing the Culpeper County CPMT were as follows:

David Durr, Culpeper County Board of Supervisors
John Egertson, Culpeper County Administrator
Lisa Peacock, CPMT Chair, Culpeper County Human Services
Russell Houck, Culpeper County Public Schools
Megan Hood, 16th District Court Service Unit
Vassanthi Griffis, Private Provider
Toni Deluca Evans, Parent Representative
Meghan Cummins, Rappahannock-Rapidan Health District
Amanda Long, CSA Coordinator, Culpeper Youth Services Network

Representing the Office of Children's Services was Stephanie Bacote, Program Audit Manager. We thank Culpeper CPMT and related staff for their cooperation and assistance on this audit.

REPORT DISTRIBUTION

Scott Reiner, Executive Director

Office of Children's Services

John C. Egertson, Culpeper County Administrator

Lisa Peacock, CPMT Chair

Valerie Lamb, CPMT Fiscal Agent

Amanda Long, CSA Coordinator

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Culpeper County CPMT

Lisa Peacock, Chair
Culpeper Human Services
Dave Durr
Board of Supervisors
Russell Houck
Culpeper Public Schools
Christa Galleo
16th District Court Service Unit



Jim LaGraffe, Vice-Chair
Community Services Board
Vassanthi Griffis
Private Provider
Toni Deluca Evans
Family Representative
Meghan Cummins
Rappahannock-Rapidan Health District

April 4, 2024

Stephanie S. Bacote
Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Dear Mrs. Bacote,

The Culpeper CPMT has received and reviewed the observations and recommendations of the Culpeper Children's Services Act (CSA) Program Audit Report No. 001-2024. We would like to take this time to thank you for your approach to the Culpeper CSA audit and the promptness of your responses. The audit findings represent invaluable insight that will enhance the program's effectiveness and ensuring adherence to statutory requirements.

Culpeper CPMT has actively addressed that non-compliance observations that were identified and the following actions were taken:

1. Measurable goals/objectives with target dates necessary for effective utilization review of services and outcomes,

Culpeper Youth Network Office has scheduled a training to be held on April 26, 2024 for all case managers in the context of development of SMART goals to address the element of measurable goals/objectives with target dates necessary for effective utilization review of services and outcomes.

We have also submitted a request to OCS for CANS and Service Planning training with Carol Wilson and Ana Antell for all case managers as Culpeper CPMT has adopted the state model IFSP effective July 1, 2024.

2. Evidence of parent/guardian participation (including foster parents) participation and consent to service plan

On February 23, 2024 CPMT voted to amend policy section **IX. Family Participation Section B.** of the Culpeper CPMT Policy Manual to state the following effective April 1, 2024:
Parents/legal guardians (Including foster parents) should always be encouraged to attend

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FAPT meetings and given the opportunity to attend in person, virtually or via phone. Parents/legal guardians are expected to be involved in the development of the IFSP/ FAPT Service Plan whenever possible. If the parent or guardian are unavailable to participate in person the signature will be obtained by the case manager either in person, via epen/docuSign, or a written statement can be accepted stating that the parent/guardian (including foster parents) were involved in the planning process and are in agreement with the recommended services stated on the IFSP.

3. Discharge plan for returning the youth to their home, relative's home, family-like setting, or community at the earliest appropriate time that addresses their needs.

Although FAPT currently does discuss discharge planning at the FAPT table evidence of such discussions has not thoroughly been documented on the IFSP. CPMT has adopted the state model IFSP that includes a section on discharge planning effective July 1, 2024. (This will allow time for training to occur for case managers on the new form.)

Once again, we extend our gratitude and appreciation of guidance to make Culpeper County CSA a stronger program.

Sincerely,



Amanda Long
Director
Culpeper Youth Network

cc: Lisa Peacock, CPMT Chair