ORANGE COUNTY, VIRGINIA
OFFICE ON YOUTH

ALISHA L. I. VINES
DIRECTOR

avines@orangecountyva.gov
PHONE: (540) 672-5484
FAX: (540) 672-2311

ADDRESS:
146 MADISON ROAD
SUITE 205
ORANGE, VA 22960

MEMORANDUM

TO: **Orange County Board of Supervisors**

FROM: **Alisha Vines, Office on Youth Director** AV

THROUGH: **R. Bryan David, Interim County Administrator**

DATE: **February 3, 2014**

SUBJECT: **CSA Monthly Report - February 2014**

Attached, please find the CSA Monthly Report for expenses incurred through November, 2013. Currently, we show our expenses paid-to-date and projections based on open cases to be under our budgeted amount. Our team continues to work hard to ensure our children and families receive the necessary services as well as remaining within our budget. As always, we will keep you updated on major changes that may affect the budget as the year progresses.

I would like to take this time to provide you an update on the CSA Audit that is in progress. We have received the preliminary draft report (attached) from our auditor, Stephanie Bacote. We are currently working with our partners to provide information that is needed as well as developing policies that were recommended by Ms. Bacote. Once we have completed all of our work, Ms. Bacote will return to Orange for an official final report. We will let the Board members know the date and time of that meeting in the event you would like to attend.

Please read over the attached report and let myself or Letitia know if you have any questions and as always, thank you for your continued support.

Attachments as noted.

cc: Letitia Douthit
File

01/31/14

COMPREHENSIVE SERVICES FOR AT-RISK YOUTH AND FAMILIES
ORANGE COUNTY COMMUNITY POLICY & MANAGEMENT TEAM
ORANGE COUNTY FAMILY ASSESSMENT & PLANNING TEAM
146 Madison Road, Suite 205
Orange, Virginia 22960
PH: 540-661-5459
FAX: 540-672-2311
E-Mail: ldouthit@orangecountyva.gov

Comprehensive Services Act Program Update Report – January and February 2014

FY 14 County budget: $2,302,987.00

Current YTD Expenses as of 01/31/14 (which are July – Dec. Exp.) for the Fiscal year:

		Expenses	Projections	Total Projected	FY14 Budget
43270	Residential Congregate Care	163,600.32	213,338.54	376,938.86	647,659
43275	FC/CC ED Serv/Sp ED priv day	218,194.16	357,601.29	575,795.45	915,331
43280	Community Based Serv	288,064.98	359,169.71	647,234.69	682,138
43285	Sp ED Wrap - CBS	8,077.00	8,052.75	16,129.75	29,732
43290	Non-Mandated - CBS	5,304.00	8,996.00	14,300.00	28,127
		683,240.46	947,158.29	1,630,398.75	2,302,987

Thank-you for your continued support, as of 01/31/14, the projections are currently under budget. We will continue to monitor it closely. We will do our best to stay with our budget while providing the much needed services to the At Risk families and Youth of Orange County. Currently, we have closed 20 cases so far this fiscal year, most with a successful outcome. However, we opened 5 new cases in December and 11 new cases in January.

As of January 31, 2014, we have provided services to 79 Youth/Families.

Total Foster Care funded by CSA: 28

- Residential FC Placements: 7
- Group Home FC Placements: 6
- Treatment FC Placements: 2

Special Education (IEP) Residential Placement: 1

Parental Agreement Residential Placement: 1

Foster Care Prevention: 38

Special Education Private Day placement (IEP): 2

Special Education Community Wrap Services: 3

Non Mandated: 4

FAPT only – non-funded: 0

Concerns for FY14:

- The Cap on funding Special Ed Wrap Services
- SEC Denial of Funding Policy

Costs of Services (average):

- Foster Care VEMAT (Additional daily supervision) payment: $320 - $2,880
- Intensive Care Coordination: $750/m
- Parent Mentor Services: $30/hr
- Mentoring: $42/hr
- KEYS Program (Counseling Interventions): $52/hr
- In Home counseling: $62/hr
- Therapeutic Day treatment in schools/community: $108/d
- Therapeutic Behavioral Aide schools/community $38/hr
- Substance Abuse Treatment (The Hope Program – RRCSB): $260/13 sessions

Thank-you

Respectfully Submitted,

Letitia Douthit

Orange County CSA Coordinator

Office of Comprehensive Services
Empowering communities to serve youth

CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared:** 1/22/2014

Discussion Point #:	1-1	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped
Cross References: Section D1 Summary		**Explanations for verbal/dropped:**
Condition/ Control Weakness	Adequate measures have not been established and/or implemented by the Orange County CPMT to evaluate and ensure accountability and effectiveness of the locally managed CSA program. Opportunities for improvement were noted based on instances of non-compliance with CSA statutory requirements and internal control weaknesses identified as follows: • The Orange County CPMT has not coordinated and documented a formal long-range plan that includes an assessment of the current risks, strengths, and needs of the existing program. The CPMT has not explicitly defined goals, objectives, and strategies to promote and facilitate the direction of the local CSA program. • The CPMT has not established measurable performance criteria based upon assessments of child/family outcomes and provider performance necessary for evaluating accountability and effectiveness of the local CSA program. • Formal, written reports describing program utilization outcomes and financial position are not presented to the CPMT. The CPMT does receive a verbal account of financial position of the CSA program, which is not reflected in the minutes of the monthly meetings. Instead, formal reports are presented to Orange County Board of Supervisors (BOS. At the time of this review, the CPMT has not established its own similar criteria or entered into the formal records (meeting minutes) a review of the reports presented to the BOS. It should be noted that the information communicated to the BOS is publicly accessible with the minutes of the BOS meetings. The ability and likelihood of the CPMT to adequately monitor and provide oversight of the local CSA program is an essential component of organizational governance. The absence of formal planning, coordination, and program evaluation to ensure that the goals and objectives of the program are met may affect the integrity of the CPMT's governance activities, maximizing the use of state and community resources, and ultimately local efforts to better serve the needs of youth and families in the community.	
Authority/ Criteria	• COV Section § 2.2-5206, Item 4; CSA Manual 3.1.5 Duties and Responsibilities; Toolkit Coordinated Long Range Planning • § 2.2-5206 Items 6, 9, and 13; DOA ARMICS, Control Environment and Control Activities • COV DOA Agency Risk Management and Internal Control Standards, Control Environment, Risk Assessment, and Control Activities.	
Recommendation	• The CPMT should coordinate with CSA stakeholder, develop, document, and implement a long-range plan to guide the locally administered CSA program. The process should include development of a formal risk assessment, goals, objectives, and strategies to direct the programs operations. The CPMT could initiate the discussion using information collected in the development the Annual Gap Survey. • The CPMT should develop measurable criteria to be used for evaluations of program accountability and effectiveness. • The CPMT should implement a process for ensuring that reports on utilization and fiscal position are formally presented periodically. The reports should become a formal part of the meeting records. The CPMT should also ensure that they establish the criteria for reporting elements to be presented.	

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:

COMMENTS: (Attach additional sheets if necessary)

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

Office of Comprehensive Services
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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/22/2014**

Discussion Point #:	**1-2**	**Final Disposition:** ☐ **Verbal** ☒ **Report** ☐ **Dropped**
Cross References: Section D1 Summary		**Explanations for verbal/dropped:**
Condition/ Control Weakness	Opportunities exist to improve communication of the philosophy, ethics, goals, objectives, policies, procedures adopted and performance outcomes achieved by the Orange County CSA Program. There was little indication of how this information is communicated beyond the CPMT. Exceptions were noted with regard to the effectiveness of dissemination of information regarding program activities as follows: • There is no formal education program to orient new and existing local CSA stakeholders (government agencies, families, providers, community) and ensure that they are afforded awareness of the responsibilities of CPMT, State requirements, local CSA policies and procedures, and performance outcomes of the program. Further, participation by CPMT and FAPT in continuing education specifically relating to CSA has been limited. • Documentation of the minutes of the monthly CPMT meetings was not prepared and approved timely. March '13 – August '13 meeting minutes were not documented until Oct. 9, 2013. For the months of February '13 and July '13, there were no minutes to review. Lastly, the minutes/agenda do not document CPMT efforts in monitoring, budgeting, and evaluation of operational and financial effectiveness. The broader dissemination of information to all CSA stakeholders promotes consistency in awareness and understanding regarding accessibility to services, and also demonstrates high standards for sound fiscal accountability and responsible use of taxpayer funds.	
Authority/ Criteria	COV § 2.2-5200 Intent and purpose; definitions, Items A.4 through A.6 § 2.2-5206. Community policy and management teams; powers and duties. Department of Accounts (DOA) Agency Risk Management and Internal Control Standards (ARMICS), Control Environment, Workforce Competence and Human Resources Development DOA ARMICS, Control Environment (Oversight by the Agency's Governing Board) and Control Activities	
Recommendation	The CPMT should implement a process to enhance communications with partner agencies, youth, families, and community stakeholders to promote the local CSA program and share information regarding the program's policies, procedures, philosophy, ethics, goals, performance, budgeting, etc. Suggested actions to be considered may include, but not limited to, the following: • Utilize the existing website for ongoing distribution of information to the public and community stakeholders (population served, annual expenditures, or costs per child, successful financial/program outcomes). • Include reporting of performance outcomes as a standing agenda item for CPMT meetings. • Utilize surveys to solicit stakeholder feedback. • Publications (e.g. pamphlets, newsletter, articles, publish public meeting minutes) • Periodically assess the training needs of CPMT, FAPT, and community stakeholders. Based upon assessment results, develop and implement a formal training agenda. At least annually, report on continuing education acquired/provided by CPMT and FAPT members as well as participation by community stakeholders (i.e. parent representatives, private providers, etc.).	

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: **Date:**

COMMENTS: (Attach additional sheets if necessary)

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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared:** 1/23/2014

Discussion Point #:	2-1	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped	
Cross References: Section D2 Summary		**Explanations for verbal/dropped:**	
Condition/ Control Weakness	The policies and procedures governing the Orange County CSA program do not adequately address intensive care coordination (ICC) and collection of information pertaining to special education students. Specific instances observed were noted as follows: • Policies and procedures have not been developed to govern ICC services as required by the Comprehensive Services Act. An agreement with the CSB was drafted in Sept. 2009, was never signed, and has since expired effective Dec. 2009. • The CPMT has established a process for collecting and maintaining data on students receiving congregate or private day education services. However, the process has not been formally documented and adopted by the CPMT as the local procedure. As a result of these circumstances, compliance requirements of CSA are not being fully met. Further, there is increased risk that existing practices are not always consistently applied.		
Authority/ Criteria	• § 2.2-5206. Community policy and management teams; powers and duties. • CSA Policy Manual Section 8.1 Utilization Management • CSA Policy Manual Section 8.2 Intensive Care Coordination **2011 Appropriations Act, Chapter 890, Item 274 § C.3.d.** • DOE/OCS Joint Memo, Reporting of Student Testing Identifier to CPMT for IEP Placements in Private Programs		
Recommendation	The Orange County CPMT should adopt written procedures governing ICC and the collection of information pertaining to SPED students. Further, the CPMT should implement a process for managing procedure reviews to ensure policies and procedures are developed and documented in accordance with CSA requirements. This process may include, but not limited to, documentation of the following: effective dates, evidence of periodic reviews, mandatory dates for updating procedures, and CPMT approval of adopted procedures.		
CLIENT RESPONSE			
CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
COMMENTS: (Attach additional sheets if necessary)			

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/22/2014**

Discussion Point #:	2-2	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped
Cross References: Section D2 Summary		**Explanations for verbal/dropped:**

Condition/ Control Weakness	Documentation of service planning activities requires strengthening to ensure compliance with program requirements. Eight case files were examined to confirm that required documentation was maintained in support of and to validate FAPT and /or multi-disciplinary team (MDT) referral and CPMT funding decisions. The results of the examination, identified opportunities for improvements based on the following: Client case files did not always contain sufficient information demonstrating compliance with CSA requirements key to coordination and service planning by FAPT. Documents missing from case files reviewed included: (1) CANS assessment applicable to the period reviewed, (2) consent to exchange information, (3) IFSP data elements necessary for service planning were omitted, such as presenting problem, child/family history, child/family strengths, and clearly defined service dates (4) vendor contract/treatment plan/progress notes, and (5) parental co-pay assessment. Observed exceptions in 7 of 13 case files reviewed. Insufficient data collection and poor document management in service planning may lead to increased operational and fiscal inefficiency and ineffectiveness of the local program. Further, this condition fosters an environment that makes the program more susceptible to potential loss of accessibility to State funding in support of local programs as a result of non-compliance with CSA statutes regarding service planning and access to pool funds.
Authority/ Criteria	• § 2.2-5208. Family assessment and planning team; powers and duties. Item 5 • CSA Policy Manual Section 3.5 Records Management Tool Kit, CPMT Guidelines for Records Management and CSA Documentation Inventory • CSA Policy Manual Section 4.3.5 Provision of Services • COV DOA Agency Risk Management and Internal Control Standards, Control Environment and Control Activities.
Recommendation	Prior to service planning, the CSA Coordinator and the FAPT should verify and obtain copies of completed CANS assessments and current consent to exchange information. The CSA Coordinator should also ensure that sufficient data is collected and documented to evidence the requirements of service planning activities are met, and that correspondence is maintained in the client case file in order to substantiate services recommended to CPMT for funding authorization. Lastly, periodic case file reviews should be performed by someone other than the CSA Coordinator to establish quality control of client records and to ensure compliance with CSA statutory requirements.

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:

COMMENTS: (Attach additional sheets if necessary)

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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/22/2014**

Discussion Point #: 2-3	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped
Cross References: Section D1 Summary and Section D2 Summary	**Explanations for verbal/dropped:**
Condition/ Control Weakness	Client specific utilization reviews are performed in coordination with FAPT service planning activities. However, a formal process documenting utilization management activity has not been implemented, particularly around monitoring the utilization and performance of residential placements. Utilization management reviews are pertinent to informed decision making responsibilities of the CPMT, which includes: • 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, relative's homes, family-like setting, or their community.
Authority/ Criteria	• § 2.2-5206. Community policy and management teams; powers and duties. • CSA Policy Manual Section 8.1 Utilization Management • COV DOA Agency Risk Management and Internal Control Standards, Control Environment and Control Activities.
Recommendation	The CPMT should develop and monitor implementation of the UM/UR plan once established. The CPMT should initiate a process that requires periodic reports on the status of UM/UR activities to be presented at the CPMT meetings. To ensure information provided is useful in CPMT decision making, the CPMT should identify required reporting elements. The CPMT could expedite this process should they consider adopting the State Sponsored UM CSA Checklist to meet the requirements, which may be modified to meet the specific needs to the local program.

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:

COMMENTS: (Attach additional sheets if necessary)

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

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CSA Program Audits

Audit Name: Orange County CSA Program

Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/23/2014**

Discussion Point #: 3-1	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped
Cross References: Section D3 Summary	**Explanations for verbal/dropped:**

Condition/ Control Weakness

Orange County CSA Program expended $41,140 and was reimbursed the state share$25,139 in Fiscal Years 2012-2013 to cover the cost of services provided to youth and families where service planning activities were not in accordance with CSA requirements. Affected transactions included payments where a mandatory and valid Child Adolescent Needs and Strengths (CANS) assessments or an Individualized Education Plan (IEP) could not be verified as completed. This condition was observed for 4 (30%) of the 13 client cases examined. Based upon the conditions cited, the potential that CSA pool funds could be mismanaged is significantly increased.

SUMMARY OF QUESTIONED COSTS

Client	Unverified Source	Total Expended	State Share[Note]
A	CANS	$3,900	$3,104
B	IEP	$2,970	$1,757
C	CANS	$5,450	$3,225
D	IEP	$28,820	$17,053

Note: Calculations based on state share match rate of 0.5917 for SPED Private Day Services and 0.7958 for community based services, where applicable.

Authority/ Criteria

- 2011 Appropriations Act, Chapter 890, Item 274, § B.1.e.
- CSA Policy Manual Section 4.5.8 Fund Audit and Toolkit
- CSA Policy Manual Section 4.6.2 Mandatory Uniform Assessment Instrument
- COV DOA Agency Risk Management and Internal Control Standards, Control Activities.

Recommendation

Prior to processing invoices for payment and submittal of pool fund reimbursement requests, the CSA Coordinator should verify that a valid CANS and/or IEP has been completed for applicable clients. The CPMT should submit a corrective action plan, for review by the OCS Finance Office, to address whether the funds will be restored. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director of whether the identified actions are acceptable or any additional actions that may be required.

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:

COMMENTS: (Attach additional sheets if necessary)

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

Office of Comprehensive Services
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CSA Program Audits

Audit Name: Orange County CSA Program

Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/22/2014**

Discussion Point #:	**3-2**	**Final Disposition:** ☐ Verbal ☒ Report ☐ Dropped	
Cross References: Section D3 Summary		**Explanations for verbal/dropped:**	
Condition/ Control Weakness	A formal process has not been established for documenting, monitoring, and collecting past due parental contributions assessed by the CPMT. As a result, sufficient measures have not been taken to facilitate timely notification of past due accounts and initiate collection procedures in order to ensure effective and efficient use of financial resources that could be used to offset the costs incurred for CSA pool funded services. Under current conditions, the opportunity lost for collection of additional funds could materially impact the local program's ability to increase funding availability for services required to meet the needs of the community.		
Authority/ Criteria	• COV § 2.2-5206 (3) • 2011 Appropriations Act, Chapter 890, Item 274 § F. • COV DOA Agency Risk Management and Internal Control Standards, Control Environment and Control Activities		
Recommendation	The CPMT should review the current co-pay policy and consider incorporating procedures for monitoring and collecting past due accounts. The CPMT should also determine the current status of parental contribution delinquencies, and initiate efforts to collect past due amounts.		
CLIENT RESPONSE			
CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
COMMENTS: (Attach additional sheets if necessary)			

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 05-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared: 1/22/2014**

Discussion Point #:	**3-3**	**Final Disposition:** ☐ **Verbal** ☒ **Report** ☐ **Dropped**	
Cross References: Section D3 Summary		**Explanations for verbal/dropped:**	
Condition/ Control Weakness	A formal process has not been established to document the reconciliation of CSA reported fund balances and the locality's reported general ledger account fund balances. A reconciliation of fund allocations/supplements, expenditures, reimbursements, Medicaid adjustments, and cash balances was not encompassed in the existing practice. Standard industry best practices dictate that fund balances are formally reconciled at least annually at the close of the year end business cycle. Complete fund balance reconciliation further enhances the reliability of information pertaining to the availability of pool funds and the financial position of the CSA program that is used for management decision making.		
Authority/ Criteria	• CSA Policy Manual Section 4.5.8 Fund Audit and Toolkit • COV DOA Agency Risk Management and Internal Control Standards, Control Activities.		
Recommendation	The CPMT should also ensure that a process is established for fully reconciling the CSA fund balances, to include pool fund allocations/supplements, expenditures, reimbursements, Medicaid adjustmensts, and cash (where applicable) with local government general ledger accounts.		
CLIENT RESPONSE			
CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:	
COMMENTS: (Attach additional sheets if necessary)			

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.

Office of Comprehensive Services
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CSA Program Audits
Audit Name: Orange County CSA Program
Audit No: 04-2014; Period: 10/01/2012 – 09/30/2013

MANAGEMENT DISCUSSION POINTS (PRELIMINARY DRAFT)

Prepared By: Stephanie S. Bacote **Date Prepared:** 1/22/2014

Discussion Point #:	4	**Final Disposition:** ☒ Verbal ☐ Report ☐ Dropped
Cross References: Section D1 Summary, Section D2, and Section D3 Summary		**Explanations for verbal/dropped:** Conditions are not material and do not warrant inclusion in the written report and/or management has initiated corrective action prior to or immediately upon notification of exposure.

Condition/ Control Weakness	• FAPT membership does not comply with CSA code section § 2.2-5205. The current organizational representation did not include a parent representative for past six months. It was noted program is actively recruiting for a replacement
	• Statements of Economic Interest forms were not completed timely by all non-government employed members of the CPMT and FAPT. Disclosure forms required to be completed annually by January 15th were not completed until October 2013. Other noted observations with the submissions were:
	  ○ The form submitted by the private provider representative on CPMT was not signed. This condition was immediately resolved once brought to the attention of the CSA Coordinator and CPMT Chair.
	  ○ One of two private provider representatives on FAPT had not submitted the form. This condition was immediately resolved once brought to the attention of the CSA Coordinator and CPMT Chair
	• Timely notification of changes to the list of registered CANS users applicable to the local program was not provided. Notification to remove a former user that no longer requires access had not been provided as of the time of this review. The user account had been deleted from CANVaS. However, the list maintained and published on the CSA website had not been updated.
	• Language in existing local fiscal policies governing the purchase of services allows for verbal agreements as an accepted practice.
	• Local fiscal policies address the approval required for invoices. However, the policy does not address the designation of a CPMT representative authorized to approve contracts and/or purchase orders.
	• One vendor was involved in the purchase of services for a single client that represents a conflict of interest for the vendor. Mentoring services were purchased on behalf of client. However, that the same vendor received payment distributions from CSA pools funds on behalf of the client served for rent on a property that was leased to the client by the same vendor that provided the mentoring services. The rent payments exceeded the amount payable for parent mentoring services. Therefore, there was the potential incentive for the vendor to delay reporting positive progress in order to continue to receive both payments. The CPMT recognized conflict and discussed that such situations would not occur in the future. No other instances were observed.

Authority/ Criteria	• § 2.2-5205. Community policy and management teams; membership; immunity from liability. • § 2.2-5207. Family assessment and planning team; membership; immunity from liability. • Orange County FAPT Policy and Procedures No. F2.A.5, Composition and Terms of Appointment • COV Sections § 2.2-3100; § 2.2-3101; § 2.2-3117; • DOA ARMICS, Control Environment and Control Activities • § 2.2-5206, CSA Manual Section 3.1.5 Duties of the CPMT Toolkit - Responsibility for Signing Contracts and Agreements
Recommendation	• The CPMT should continue its efforts to actively recruit a parent representative and consider maintaining a pool of potential replacements to minimize impact of potential vacancies. • The CPMT should ensure that Statement of Economic Interest Forms are signed and submitted no later than January 15th annually by applicable CPMT and FAPT members. • The CPMT should consider revising existing policy language to remove verbal agreements as an accepted practice governing the purchase of services. • The CPMT should consider revising existing fiscal policy to formally designate the CPMT representative authorized to approve contracts and/or purchase orders. • Periodically review contact information provided to OCS and published on the CSA website to ensure information is accurate and current. Immediately notify OCS of any required changes.

CLIENT RESPONSE

CSA Coordinator	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:
CPMT Chairperson	☐ Concur ☐ Do not concur ☐ No opinion at this time	Signature: Date:

COMMENTS: (Attach additional sheets if necessary)

Reviewed By: Click here to enter text. **Date:** Click here to enter a date.