

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 258  
ORANGE, VA 22960

**To:** Orange County Board of Supervisors  
**From:** Alisha Vines, Office on Youth Director *AV*  
**Through:** Julie Jordan, County Administrator *JJ*  
**Date:** June 15, 2012  
**Subject:** CSA Monthly Report – May 2012

Please find attached the April 2012 report for CSA. As a reminder, the CSA data is always a month behind due to the nature of the billing cycles. (Ex: month end reporting for March is actually the numbers for February expenses.)

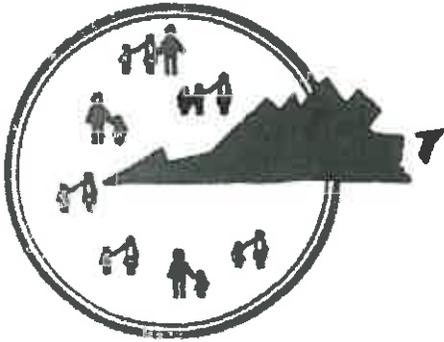
At this time our projections continue to show that CSA spending is still slightly under budget for FY12. As you know, this may continue to fluctuate as the year continues and we will be sure to keep you apprised of any major financial issues that may arise.

In addition, Letitia and I attended the first annual Office of Comprehensive Services conference on June 5<sup>th</sup> and 6<sup>th</sup>. One of the breakout sessions at the conference provided information on the upcoming audits of the local CSA departments across the state. Orange has been determined to have an on-site audit during FY13 and so we are busy preparing for this review and will keep you informed of when this will take place. I have included two attachments for you to review in regards to this new process and please feel free to reach out to me or Letitia if you should have any questions.

As always, we thank you for your continued support.

Cc: Letitia Douthit  
File

06/14/12



COMPREHENSIVE SERVICES FOR AT-RISK YOUTH AND FAMILIES  
ORANGE COUNTY COMMUNITY POLICY & MANAGEMENT TEAM  
ORANGE COUNTY FAMILY ASSESSMENT & PLANNING TEAM  
146 Madison Road, Suite 258  
Orange, Virginia 22960  
PH: 540-661-5459  
FAX: 540-672-2311  
[E-Mail: ldouthit@orangecountyva.gov](mailto:ldouthit@orangecountyva.gov)

## Comprehensive Services Act Program Update Report – May, 2012

FY 12 County Budget: \$2,302,987.00

Current YTD Expenses (thru April) and Projections as of 05/31/12 for the Fiscal year:

	Expenses	Projections	Total
5651	\$313,635.34	129,080.00	442,715.34
5652	\$928,335.12	214,744.13	1,143,079.25
5653	\$475,578.11	219,612.43	695,190.14
5657	\$4,710.00	2,800.00	5,000.00
			<hr/>
			\$2,277,522.73

As of 05/31/12 our projections are showing us under budget by \$25,464.27. Even though we have only 2 months left in this fiscal year the projected numbers will fluctuate as children enter and exit the program. The numbers may also fluctuate due to the youth and families needs.

Year to date, we are serving 86 Youth/Families.

Total Foster Care funded by CSA: 32\*\*

- \*\* 8 are court placed – to include charges of assault & battery, sexual offenses, breaking & entering, destruction of property, etc.
- Residential Placements YTD: 16 – currently:14

Foster Care Prevention: 40

Special Education Private Day placement (IEP): 2

Special Education Community Wrap Services: 10

Non Mandated: 2

Concerns for FY12:

- CSA Spending Reduction Plans – distributed with prior CSA budget update
- Government Reform Commission – CSA Initiatives - distributed with prior CSA budget update
- The Increase in IEP Private School Day Placements
- Increase in Residential Costs: average 15,000 to 35,000 per month
- VICAP assessments done by the CSB in order to access Medicaid funding
- Stricter Medicaid requirements resulting in Medicaid not covering as many services/Youth
- New SEC Denial Policy
- Possible Mental Health changes
- The closing of Sheltering Arms

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

**DRAFT**



# Office of Comprehensive Services

Empowering communities to serve youth

## ***Audit Plan***

***Fiscal Years 2013 - 2015***

***June 10, 2012***



**DRAFT**

# COMMONWEALTH of VIRGINIA

Susan Cumbia Clare, M.Ed  
Executive Director

OFFICE OF COMPREHENSIVE SERVICES  
*Administering the Comprehensive Services Act for At-Risk Youth and Families*

June 10, 2012

## **MEMORANDUM**

TO: Susan C. Clare, Executive Director

FROM: Stephanie S. Bacote, CSA Program Auditor  
Ty F. Parr, CSA Program Auditor

SUBJECT: Fiscal Years 2013 – 2015 Audit Work Plan

The Fiscal Years 2013-2015 Audit Work Plan for the Office of Comprehensive Services' Financial/Compliance Program Audit is enclosed. The workload is divided into three audit categories:

- On-Site Audits
- Self-Assessment Audits
- Special Projects

The scope of these audits is to conduct an independent, objective evaluation of the locally administered Comprehensive Services for At-Risk Youth and Families (CSA) programs in order to provide reasonable assurance that the mission and vision of CSA and the Office of Comprehensive Services are accomplished. The basis for the audit selections included risk assessment, management input, and the established audit cycle (every 3 years).

In accordance with the Institute of Internal Auditors, Standards for the Professional Practice of Internal Auditing, we are submitting this plan for your approval.

Approved

\_\_\_\_\_  
Susan C. Clare

## INTRODUCTION

The Program Audit function of the Office of Comprehensive Services (OCS) is responsible for evaluating the adequacy and effectiveness of the systems of internal control and quality of performance in meeting mission requirements established by the State Executive Council (SEC) and the locally administered programs of the Comprehensive Services Act for At-Risk Youth and Families (CSA). To accomplish our objective of promoting effective controls, high standards for sound fiscal accountability, and responsible use of taxpayer funds, our audits provide analyses, appraisals, recommendations, counsel, and information concerning various activities of CSA to assist CSA employees, partners, and other stakeholders to effectively administer CSA.

We will add value to OCS goals by:

- Reviewing the adequacy of CSA risk management, governance, and control processes.
- Determining whether the established goals and objectives of CSA are accomplished.
- Determining the extent of compliance with CSA laws, statutes, policies and procedures, etc.
- Reviewing the reliability and integrity of CSA program and financial information.
- Evaluating the controls governing the safeguarding of CSA assets and/or data.
- Appraising whether CSA resources are used effectively and efficiently; recommend operational improvement.

Program Audit personnel possess the training, expertise, and experience to effectively evaluate locally administered CSA programs. Auditors are required to comply with the continuing professional education criteria established by the Institute of Internal Auditors and the Department of State Internal Auditor. Personnel are encouraged to pursue professional certification as Certified Internal Auditors.

We will continue to look for ways to improve our audit programs to ensure that we consistently add value to the Office of Comprehensive Services.

---

Stephanie S. Bacote  
CSA Program Auditor

---

Ty F. Parr  
CSA Program Auditor

## SUMMARY OF 2013 -2015 AUDIT PLAN

FISCAL YEAR 2013	FISCAL YEAR 2014	FISCAL YEAR 2015
Albemarle	Accomack	Amherst
Allegheny/Covington/Clifton Forge	Alexandria	Bath
Arlington City/County	Amelia	Bedford City/County
Buchanan	Augusta/Staunton/Waynesboro	Bland
Buckingham	Botetourt	Charles City
Carroll	Bristol	Charlotte
Chesapeake	Brunswick	Clarke
Danville/Pittsylvania	Campbell	Danville/Pittsylvania
Dickenson	Caroline	Dinwiddie
Fluvanna	Charlottesville	Emporia
Franklin County	Chesterfield/Colonial Heights	Essex
Frederick	Craig	Floyd
Fredericksburg	Culpeper	Franklin City
Gloucester	Cumberland	Galax
Halifax	Danville/Pittsylvania	Giles
Hampton	Fairfax	Grayson
Hanover	Fairfax/Falls Church	Greene
Harrisonburg/Rockingham	Fauquier	Greensville
Henrico	Goochland	Highland
Hopewell	Isle of Wight	King & Queen
Lunenburg	James City	King George
Lynchburg	Lancaster	King William
Manassas Park	Loudon	Lee
Mecklenburg	Martinsville/Henry/Patrick	Louisa
Montgomery	Middlesex	Madison
Newport News	New Kent	Manassas City
Norfolk	Prince Edward	Mathews
Northampton	Prince William	Nelson
Nottoway	Pulaski	Northumberland
Orange	Richmond City	Norton
Petersburg	Richmond County	Page
Portsmouth	Rockbridge/Lexington/Buena Vista	Poquoson
Prince George	Scott	Powhatan
Roanoke City	Smyth	Radford
Roanoke County	Stafford	Rappahannock
Russell	Suffolk	Salem
Shenandoah	Tazewell	Southampton
Spotsylvania	Washington	Sussex
Surry	Westmoreland	Warren
Virginia Beach	Wise	Williamsburg
Winchester	York	
Wythe		

**FISCAL YEAR 13 AUDIT PLAN SCHEDULE**

	<b>REGION</b>	<b>LOCALITY</b>	
<b>ON-SITE AUDITS (2600 Hours)</b>	Central	Fluvanna Hanover Hopewell Petersburg	<b>SPECIAL PROJECTS (528 HOURS)</b>
	Northern	Harrisonburg/Rockingham Orange Shenandoah Winchester	
	Southwest	Carroll Montgomery Roanoke City Wythe	
	Tidewater	Gloucester Norfolk Surry Virginia Beach	
	Western	Allegheny/Covington/Clifton Forge Halifax Lunenburg Lynchburg Danville/Pittsylvania	
<b>SELF- ASSESSMENT AUDITS (400 Hours)</b>	Central	Henrico Nottoway Prince George Spotsylvania Fredericksburg	
	Northern	Arlington City/County Frederick Manassas Park	
	Southwest	Buchanan Dickenson Franklin County Roanoke County Russell	
	Tidewater	Chesapeake Hampton Newport News Northampton Portsmouth	
	Western	Albemarle Buckingham Mecklenburg	

## FISCAL YEAR 14 AUDIT PLAN SCHEDULE

	REGION	LOCALITY	
COUNTIES	Central	Amelia Caroline Chesterfield/Colonial Heights Cumberland Goochland New Kent	<b>Note: On-site and self-assessment audits to be scheduled in accordance with the results of the annual risk assessment. The FY 14 audit schedule will be updated and published accordingly.</b>
	Northern	Culpeper Fairfax Fauquier Loudon Prince William Stafford	
	Southwest	Craig Martinsville/Henry/Patrick Pulaski Scott Smyth Tazewell Washington Wise	
	Tidewater	Accomack Brunswick Isle of Wight James City Lancaster Middlesex Richmond Westmoreland York	
	Western	Augusta/Staunton/Waynesboro Botetourt Campbell Pittsylvania Prince Edward Rockbrige/Lexington/Buena Vista	
	CITIES	Central	
Northern		Alexandria City Fairfax/Falls Church	
Southwest		Bristol	
Tidewater		Suffolk	
Western		Charlottesville Danville	

## FISCAL YEAR 15 AUDIT PLAN SCHEDULE

<b>COUNTIES</b>	<b>REGION</b>	<b>LOCALITY</b>	<b>Note: On-site and self-assessment audits to be scheduled in accordance with the results of the annual risk assessment. The FY 15 audit schedule will be updated and published accordingly.</b>	
	Central	Charles City Dinwiddie Essex King & Queen King William Louisa Powhatan		
	Northern	Clarke Greene King George Madison Page Rappahannock Warren		
	Southwest	Bland Floyd Giles Grayson Lee		
	Tidewater	Greensville Mathews Southampton Sussex Northumberland		
	Western	Amherst Bath Bedford City/County Charlotte Highland Nelson Pittsylvania		
<b>CITIES</b>	Northern	Manassas City		
	Southwest	Galax Norton Radford Salem		
	Tidewater	Emporia Franklin Poquoson Williamsburg		
	Western	Danville		

DRAFT COPY



**SELF ASSESSMENT WORKBOOK**

**FOR**

**LOCALLY ADMINISTERED CSA PROGRAMS**

The mission of the Comprehensive Services Act (CSA) is to create collaborative system of services and funding that is child-centered, family-focused and community-based when addressing the strengths and needs of troubled and at-risk youth and their families.

The Office of Comprehensive Services (OCS) serves as the administrative entity to ensure implementation of the decisions of the State Executive Council for the CSA.

## Vision Statement

OCS envisions CSA as a national model in providing effective and innovative systems of care statewide for at-risk youth and families.

We strive for CSA to be highly regarded as a leader in improving outcomes for children and their families by:

- facilitating the highest quality technical assistance and training to strengthen the capacity of communities to implement CSA;
- maintaining high standards for sound fiscal accountability and responsible use of taxpayer funds; and
- partnering with families and all CSA stakeholders to implement best practices and technology to continually improve the performance of CSA.

OCS strives to maintain an enthusiastic, creative and knowledgeable staff empowered to work with CSA stakeholders to sustain the highest quality system of care for Virginia's youth and their families.

This self-assessment workbook is designed to facilitate OCS and locally administered CSA program efforts to ensure that the objectives of the Comprehensive Services Act are achieved and the decisions of the State Executive Council (SEC) are implemented accordingly. As such, the self-assessment workbook has been adopted in support of the OCS continuous quality improvement program, which includes program audits, technical assistance, and training.

Approved on this day, June XX, 2012, by:

---

Susan C. Clare, Executive Director

## TABLE OF CONTENTS

Self Assessment Workbook Topics	Page References		
Section I: Governance	1	-	12
Section II: Risk Management	13	-	17
Section III: Internal Control	18	-	27
Section IV: Training	28	-	29
Section V: Compliance	30	-	73
Section VI: Corrective Action	74	-	76
Section VII: Certification	77	-	79

## **SECTION I: GOVERNANCE**

- Organizational Structure Worksheet
- Management Philosophy Worksheet
- Policies and Procedures Worksheet
- Process Narratives/Flowchart Worksheet
- Monitoring Worksheet
- Organizational Level Internal Control Assessment Survey

## SECTION I: GOVERNANCE ORGANIZATIONAL STRUCTURE WORKSHEET

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: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Document and maintain a current organization chart of the locally administered CSA structure.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Maintain documentation which identifies locally administered CSA staff to include, but not limited to: <ul style="list-style-type: none"> <li>• CPMT Members</li> <li>• FAPT Members</li> <li>• CSA Coordinators</li> <li>• UM/UR</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Maintain documentation which identifies the affiliations, dates of tenure, and roles (chair, fiscal agent, etc.) of locally administered CSA staff.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Maintain documentation to describe the duties and responsibilities of key staff (i.e. CSA Coordinator, CPMT Chair, FAPT Chair, Fiscal Agent, UM Reviewer) responsible for locally administered CSA programs		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Ensure that membership of the CPMT and FAPT is balanced appropriately among the representatives required to serve on the team in accordance with <a href="#">§ 2.2-5205</a> .		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Authority/Criteria: [COV § 2.2-5205](#); CSA Policy Manual Section 3, Local Management Structure

<b>Completed By:</b>		<b>Date:</b>	<a href="#">Click here to enter a date.</a>
----------------------	--	--------------	---

## SECTION I: GOVERNANCE MANAGEMENT PHILOSOPHY WORKSHEET

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: [http://www.doa.virginia.gov/Financial Reporting/ARMICS/ARMICS Standards.pdf](http://www.doa.virginia.gov/Financial%20Reporting/ARMICS/ARMICS%20Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Document mission, vision, values, goals, and objectives of the local CSA program.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Document a Code of Ethics applicable to CSA local program staff. As an alternative, ethics codes established by the local governing authority may be adopted. This should be published and/or reflected in the minutes of the CPMT.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Verify and maintain completed conflict of /statement of economic interest forms for all applicable local CSA staff.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Ensure conflict of/statement of economic interest forms are updated annually for all applicable local CSA staff.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Verify and maintain statement of confidentiality signed by CPMT, FAPT, and related parties.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Establish, document, and retain schedule of CPMT and FAPT meetings.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Record and retain formal minutes of CPMT and FAPT administrative meetings.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Document CPMT/FAPT joint meetings.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Maintain a central repository of communications issued by the CPMT.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Authority/Criteria: COV [§ 2.2-5205](#), CSA Policy Manual Section 3, Local Management Structure

<b>Completed By:</b>		<b>Date:</b>	<a href="#">Click here to enter a date.</a>
----------------------	--	--------------	---

## SECTION I: GOVERNANCE POLICIES AND PROCEDURES WORKSHEET

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 approvals, authorizations, verifications, reconciliations, security over assets and data, and segregation of duties.

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

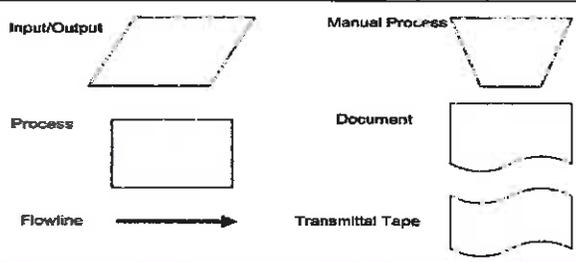
Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Document policies and procedures governing CPMT administrative activities (i.e. bylaws).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Document operational policies and procedures governing access to CSA pool funds.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Document policies and procedures governing the procurement of and contracting for CSA related services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Document fiscal policies and procedures governing expenditure of CSA pool funds.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Document policies and procedures governing utilization management and utilization reviews.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Establish a process and schedule/frequency for review of all policies and procedures.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Maintain evidence that procedures are current and are reviewed in accordance with the established schedule.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Ensure that locally established policies and procedures are consistent with applicable statutes, laws, regulations, etc.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Ensure that locally established policies and procedures are consistent with SEC directives and the CSA Policy Manual.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Authority/Criteria COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

## SECTION I: GOVERNANCE

### PROCESS NARRATIVE / FLOWCHART WORKSHEET

Process flow analysis can be documented in narrative or diagram (a.k.a. flowchart) form to better understand interrelationships among process inputs, tasks, outputs, and responsibilities. In order to diagram the process, the entities and documents involved in the process must be identified. A flowchart shows step-by-step progression through a procedure or system using connecting lines and a set of conventional symbols. Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets, if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Prepare a narrative or flowchart describing the process for review of referrals to FAPT.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Prepare a narrative or flowchart describing the process for performing utilization management reviews.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Prepare a narrative or flowchart describing the process for purchasing and or contracting for services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Prepare a narrative or flowchart for CPMT approval of funding of FAPT approved services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Prepare a narrative or flowchart for processing payments for CSA approved services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Prepare a narrative or flowchart to describe the process for requesting and monitoring of expenditures and related reimbursements.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Common Flowchart Symbols</b>					
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

## SECTION I: GOVERNANCE MONITORING WORKSHEET

“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 providing recommendations.
- Training seminars, planning sessions and other meetings giving feedback to management.

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Maintain documentation of local CSA staff participation in training seminars, planning sessions, and other meetings.					
2. Identify list of monitoring (operational and financial) reports furnished to the FAPT and/or CPMT along with scheduled due dates.					
3. Demonstrate that monitoring reports were published timely and reviewed by the CPMT.					
4. Maintain a central repository of reports issued by internal auditors, external auditor, and other advisory resources (e.g. DSS IV-E Reviews).					
5. Maintain a central repository of corrective action plans prepared and/or implemented in response to Task 4.					
6. Ensure that corrective action plans were implemented by the established due dates.					
7. Solicit and document feedback from local CSA program partners and stakeholders regarding the effectiveness of the program.					

Authority/Criteria: CDV [§ 2.2-5205](#), CSA Policy Manual Section 3, Local Management Structure

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>ETHICS</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
2. 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.	<input type="checkbox"/>	<input type="checkbox"/>	
3. 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.	<input type="checkbox"/>	<input type="checkbox"/>	
4. The CPMT and FAPT demonstrate a commitment to integrity and ethical behavior by example in their day-to-day activities.	<input type="checkbox"/>	<input type="checkbox"/>	
5. Local CSA staff are generally inclined to do the "right thing" when faced with pressures to cut corners with regard to policies and procedures.	<input type="checkbox"/>	<input type="checkbox"/>	
6. The CPMT addresses and resolves violations of behavioral and ethical standards consistently, timely, and equitably in accordance with the provision of the programs COE.	<input type="checkbox"/>	<input type="checkbox"/>	
7. The existence of the program's COE and the consequences of its breach are an effective deterrent to unethical behavior.	<input type="checkbox"/>	<input type="checkbox"/>	
8. The CPMT strictly prohibits circumvention of established policies and procedures, except where specific guidance has been provided and demonstrates commitment to CSA principles.	<input type="checkbox"/>	<input type="checkbox"/>	
9. Performance targets are reasonable, realistic, and do not create undue pressure on achievement of short-term objectives.	<input type="checkbox"/>	<input type="checkbox"/>	
10. Ethics are woven into criteria used to evaluate local CSA individual or program performance.	<input type="checkbox"/>	<input type="checkbox"/>	
11. CPMT reacts appropriately when receiving unfavorable news from subordinates and divisions.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>PROFESSIONAL AND TECHNICAL COMPETENCE</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. Job descriptions (and other documents that define key duties/requirements) are current, accurate, and understood.	<input type="checkbox"/>	<input type="checkbox"/>	
2. There is a mechanism in place to keep job descriptions current, accurate, and understood.	<input type="checkbox"/>	<input type="checkbox"/>	
3. Job knowledge/skills requirements realistically match the CSA program and position's needs.	<input type="checkbox"/>	<input type="checkbox"/>	
4. The CPMT and FAPT has the specialized knowledge, experience, and training required to perform their duties and do not rely extensively on technical specialists or outside consultants.	<input type="checkbox"/>	<input type="checkbox"/>	

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>PROFESSIONAL AND TECHNICAL COMPETENCE (Continued)</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
5. Local CSA staff is properly trained and capable of performing the duties assigned.	<input type="checkbox"/>	<input type="checkbox"/>	
6. Local CSA staff, partners, and stakeholders are committed to excellence in performing their jobs.	<input type="checkbox"/>	<input type="checkbox"/>	
7. 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).	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>ORGANIZATIONAL STRUCTURE</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. The organizational structure of the local CSA program is appropriate to carry out its mission and manage its activities.	<input type="checkbox"/>	<input type="checkbox"/>	
2. The organizational structure of the local CSA program provides adequate supervisory and managerial oversight.	<input type="checkbox"/>	<input type="checkbox"/>	
3. The current organizational structure facilitates the flow of information both up and down within the program and across to other partners and stakeholders.	<input type="checkbox"/>	<input type="checkbox"/>	
4. Reporting relationships provide the CPMT, FAPT, and CSA Coordinators with the information appropriate to their responsibility and authority.	<input type="checkbox"/>	<input type="checkbox"/>	
5. CSA Coordinators and FAPT members have ready access to the CPMT in addressing significant issues.	<input type="checkbox"/>	<input type="checkbox"/>	
6. The CPMT periodically evaluates the organizational structure in light of changes in the scope, nature, or extent of operations.	<input type="checkbox"/>	<input type="checkbox"/>	
7. The program has the appropriate number of people and resources allocated to key functions/activities.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>ASSIGNMENT OF AUTHORITY AND RESPONSIBILITY</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
2. Specific limits are established for certain types of transactions and delegations are clearly communicated and understood by local CSA program stakeholders.	<input type="checkbox"/>	<input type="checkbox"/>	
3. The CPMT accepts responsibility for information generated by the program and on reported results.	<input type="checkbox"/>	<input type="checkbox"/>	

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>ASSIGNMENT OF AUTHORITY AND RESPONSIBILITY (Continued)</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
4. The CPMT is appropriately empowered to correct problems and implement improvements.	<input type="checkbox"/>	<input type="checkbox"/>	
5. The current level of delegation of duties balances empowerment and "getting the job done" with CPMT involvement and authority.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>RISK ASSESSMENT</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. Formal or informal mechanisms exist to inform the CPMT of events that are considered risk (events that may adversely affect the achievement of CSA objectives).	<input type="checkbox"/>	<input type="checkbox"/>	
2. The CPMT assesses for inherent risk (risk is management takes no action to reduce either likelihood or impact); considers both likelihood and impact; develops a risk response to each identified risk; and then considers residual risk. (Examples of risk responses are avoiding, reducing, sharing, and acceptance).	<input type="checkbox"/>	<input type="checkbox"/>	
3. The process used to analyze risk in the local CSA program is clearly understood and includes estimating the significance of risk and assessing the likelihood of their occurring.	<input type="checkbox"/>	<input type="checkbox"/>	
4. The process used to analyze risk in the local CSA program includes determining steps needed to mitigate risks.	<input type="checkbox"/>	<input type="checkbox"/>	
5. In determining risk response, the CPMT considers the effects of potential responses on risk likelihood and impact because a response may affect the likelihood and impact differently.	<input type="checkbox"/>	<input type="checkbox"/>	
6. The CPMT risk response considerations are not limited solely to reducing identified risk, but also include consideration of new opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	
7. Once the CPMT has selected a risk response, the CPMT determines of whether an implementation plan is needed is completed.	<input type="checkbox"/>	<input type="checkbox"/>	
8. If an implementation plan is needed, the CPMT establishes the necessary procedures to ensure the risk response is carried out.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>CONTROL ACTIVITIES FOR FISCAL PROCESSES</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. Appropriate policies and procedures have been developed and implemented for major CSA processes.	<input type="checkbox"/>	<input type="checkbox"/>	

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>CONTROL ACTIVITIES FOR FISCAL PROCESSES (Continued)</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
2. Appropriate and timely actions are taken on exceptions to local CSA program policies and procedures.	<input type="checkbox"/>	<input type="checkbox"/>	
3. Policies and procedures identify how processes are to be performed and monitored, and who is responsible for carrying them out.	<input type="checkbox"/>	<input type="checkbox"/>	
4. Control activities (approvals, authorizations, separation of duties, etc.) described in policy and procedure manuals are actually applied the way they are intended to be applied and clearly relate to designated risks.	<input type="checkbox"/>	<input type="checkbox"/>	
5. Controls are in place to provide reasonable assurance that CPMT decisions are properly carried out.	<input type="checkbox"/>	<input type="checkbox"/>	
6. CPMT personnel with appropriate responsibilities, organizational experience, and knowledge of the program's affairs periodically review and document the functioning and overall effectiveness of controls.	<input type="checkbox"/>	<input type="checkbox"/>	
7. Appropriate criteria are established to evaluate controls.	<input type="checkbox"/>	<input type="checkbox"/>	
8. 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.	<input type="checkbox"/>	<input type="checkbox"/>	
9. Effective procedures have been established for the routine verification of the accuracy of data when it is entered, processed, generated, distributed, or transferred.	<input type="checkbox"/>	<input type="checkbox"/>	
10. Individuals from different functions have appropriately segregated responsibility for control over assets and data and the processing of transactions.	<input type="checkbox"/>	<input type="checkbox"/>	
11. Effective contingency plans have been developed and documented to deal with service interruptions if they occur.	<input type="checkbox"/>	<input type="checkbox"/>	
12. Periodic tests of contingency and disaster recovery plans take place to make sure they are current, operational, and effective.	<input type="checkbox"/>	<input type="checkbox"/>	
13. Appropriate controls are built-in as new information systems are designed and integrated into the program.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>INFORMATON</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. Adequate information gathering mechanisms are in place to provide information to appropriate local CSA program staff so that they can carry out their operating, reporting, and compliance responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>INFORMATON (Continued)</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
2. Reports generated or used by the FAPT, CPMT, and other CSA partners/stakeholders are adequate and contain sufficient and meaningful information.	<input type="checkbox"/>	<input type="checkbox"/>	
3. Mechanisms exist for identifying emerging information needs.	<input type="checkbox"/>	<input type="checkbox"/>	
4. An information technology plan has been developed that is linked to achieving the programs objectives.	<input type="checkbox"/>	<input type="checkbox"/>	
5. Information technology plans are modified as needed to support new objectives.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>COMMUNICATION</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. Communication channels exist for CSA stakeholders to effectively communicate up, down, across, and within the program.	<input type="checkbox"/>	<input type="checkbox"/>	
2. Computer information/analytical reports are provided to the right people, with the right level of detail, at the right time.	<input type="checkbox"/>	<input type="checkbox"/>	
3. Mechanisms are in place to identify emerging technology needs, establish priorities, and provide feedback on system performance.	<input type="checkbox"/>	<input type="checkbox"/>	
4. A clear communication channel is available to report suspected improprieties.	<input type="checkbox"/>	<input type="checkbox"/>	
5. Persons who report suspected improprieties are provided feedback and are immune from reprisals.	<input type="checkbox"/>	<input type="checkbox"/>	
6. Realistic mechanisms are in place for CSA stakeholders to provide recommendations for improvement.	<input type="checkbox"/>	<input type="checkbox"/>	
7. Changes with respect to statewide and local objectives and strategies are communicated timely and effectively to all effected CSA stakeholders.	<input type="checkbox"/>	<input type="checkbox"/>	
8. Outside parties understand the program's ethical and behavioral standards and expectations regarding dealings with the program.	<input type="checkbox"/>	<input type="checkbox"/>	
9. 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.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			
<b>MONITORING</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
1. The CPMT has established performance measures for processes and receives periodic reports of results against those measures.	<input type="checkbox"/>	<input type="checkbox"/>	

**SECTION I: GOVERNANCE  
ORGANIZATIONAL LEVEL  
INTERNAL CONTROL ENVIRONMENT ASSESSMENT SURVEY**

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

<b>MONITORING (Continued)</b>			
<b>This Control Implemented and Operating Effectively</b>	<b>Response</b>		<b>Comments</b>
	<b>Agree</b>	<b>Disagree</b>	
2. Individuals responsible for reports are required to "sign off" on their accuracy and integrity and are held accountable if errors are discovered.	<input type="checkbox"/>	<input type="checkbox"/>	
3. In the event of known control breakdowns or deficiencies, controls that should have prevented or detected problems are reassessed and modified as appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	
4. Evaluations of the entire internal control system are performed when there are major changes in operations.	<input type="checkbox"/>	<input type="checkbox"/>	
5. An appropriate level of documentation is developed to facilitate an understanding of how the system of internal controls work.	<input type="checkbox"/>	<input type="checkbox"/>	
6. Local CSA staff is provided with sufficient control and compliance training sessions and feedback opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	
7. Control deficiencies are identified by on-going monitoring activities by the CPMT, including managerial activities and everyday supervision of CSA staff.	<input type="checkbox"/>	<input type="checkbox"/>	
8. Control deficiencies are identified during separate evaluations of the programs internal control system (i.e. internal/external audit).	<input type="checkbox"/>	<input type="checkbox"/>	
9. Internal control deficiencies are reported to the person directly responsible for the activity and to the CPMT.	<input type="checkbox"/>	<input type="checkbox"/>	
10. The CPMT ensures that the necessary follow-up actions are taken in response to reported control deficiencies.	<input type="checkbox"/>	<input type="checkbox"/>	
11. Specifications have been established for deficiencies that should be reported to more senior management or board (e.g. local government leader; Office of Comprehensive Services; State Executive Council [SEC]).	<input type="checkbox"/>	<input type="checkbox"/>	
12. Current audit/compliance reporting procedures are timely and effective.	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Conclusions Reached and Actions Needed:</b>			

## **SECTION II: RISK MANAGMENT**

- Risk Assessment Worksheet
  - Identification of Risk Exposures
  - Likelihood and Impact of Risk Exposures
  - Risk Response Plans
  
- 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: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			Comments
		Y	N	N/A	
1. Establish requirements for completing risk assessment process, to include but not limited to: a. Responsible Party b. Frequency c. Communicating Results d. Implementation of Risk Responses		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1. Perform and document a risk assessment of the locally administered CSA program. The Risk Assessment Worksheet Supplement or a reasonable facsimile may be used.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Communicate results of the risk assessment to appropriate parties.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Verify and document timely completion of the risk assessment and implementation plans, if applicable.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Ensure that an assessment of fraud risk is completed. Select at least 3 individuals from the local CSA program staff to complete questionnaire (1 each from CPMT, FAPT, CSA Coordinator, and Utilization Review.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

## SECTION II: RISK MANAGEMENT RISK ASSESSMENT WORKSHEET SUPPLEMENT

Potential Risk Event/Exposure	SEVERITY RANKINGS & RESPONSE ACTIONS			Implementation Plan (Check box if plan is required. Required for all rated as high. Include as an attachment to this file).
	Likelihood Rate as follows: High = 3 Moderate = 2 Low = 1	Impact	Risk Response Rate as follows A = Avoid R = Reduce S = Share X = Accept	
				<input type="checkbox"/>

EXPLANATION OF KEY TERMS	
<b>Likelihood</b>	Defined as “the odds” that a given event will occur.
<b>Impact</b>	The measurement of the effect of the event in quantitative or qualitative terms.
<b>Avoid</b>	Ending those activities that give rise to risk (e.g. eliminating a service or function).
<b>Reduce</b>	Involves everyday management decisions, including imposing control activities (i.e. reviews, approvals, authorizations, inspections, reconciliations, routine activities).
<b>Sharing</b>	Transfers a portion of likelihood or impact to another party (e.g. outsourcing).
<b>Acceptance</b>	Taking no action in response to risk, within parameters dictated by established policy. All risk cannot be eliminated. Risk that remains after all possible risk responses have been taken is accepted and often referred to as residual risk.
<b>Probability</b>	High (requires action to avoid or reduce the risk)
	Moderate (requires action reduce the risk)
	Low (requires no action; accept the risk)

<b>Prepared By:</b>		<b>Title:</b>		<b>Date:</b>	Click here to enter a date.
<b>Reviewed By:</b>		<b>Title:</b>		<b>Date:</b>	Click here to enter a date.

## SECTION II: RISK MANAGEMENT FRAUD RISK QUESTIONNAIRE

(Page 1 of 2)

Name:	Title:	Date:	
QUESTIONS	RESPONSE		COMMENTS
	YES	No	
1. How long have you been with the organization?	<input type="checkbox"/>	<input type="checkbox"/>	
2. How long have you been in your current role?	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the agency/organization have ethics policies and procedures? If yes, how is it communicated and how often?	<input type="checkbox"/>	<input type="checkbox"/>	
4. How do you communicate your views on ethical behavior in the workplace?	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are your views on ethics consistent with those of the agency/organization?	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do employees of the organization demonstrate high ethical standards?	<input type="checkbox"/>	<input type="checkbox"/>	
7. Do middle managers of the organization demonstrate high ethical standards?	<input type="checkbox"/>	<input type="checkbox"/>	
8. Do senior managers of the organization demonstrate high ethical standards?	<input type="checkbox"/>	<input type="checkbox"/>	
9. Has the agency 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 13.	<input type="checkbox"/>	<input type="checkbox"/>	
10. Are the internal controls established adequately designed to mitigate fraud risk/exposures?	<input type="checkbox"/>	<input type="checkbox"/>	
11. If yes to questions 10 and 11, are those controls operating as intended?	<input type="checkbox"/>	<input type="checkbox"/>	
12. What are the potential fraud risk/exposures for this organization?	<input type="checkbox"/>	<input type="checkbox"/>	
13. Have any operating units been identified as particularly vulnerable to fraud? If yes, please explain.	<input type="checkbox"/>	<input type="checkbox"/>	
14. Does the organization have a procedure in place for employees to report suspected fraud? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>	
15. If an employee were aware of possible wrong-doing within the agency, would management be informed? Please explain?	<input type="checkbox"/>	<input type="checkbox"/>	
16. If someone in the organization was committing fraud and other employees knew about this practice, would they tell you? Explain.	<input type="checkbox"/>	<input type="checkbox"/>	
17. If someone wanted to acquire assets (data, equipment, cash instruments) or manipulate the records of the organization through improper and/or fraudulent means, how would it most likely be done and the key personnel to be involved?	<input type="checkbox"/>	<input type="checkbox"/>	

## SECTION II: RISK MANAGEMENT FRAUD RISK QUESTIONNAIRE

(Page 2 of 2)

Name:	Title:	Date:		
QUESTIONS	RESPONSE		COMMENTS	
	YES	No		
18. Are you aware of any instances where an unauthorized individual gained access to sensitive operational and financial resources? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>		
19. Have you ever observed any unusual transactions/activities that were recorded after the close of business, on weekends, or holidays? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>		
20. Has your supervisor or anyone in senior management ever requested you to process an unusual or poorly documented transaction, or something you that you suspected was improper. If yes, please explain.	<input type="checkbox"/>	<input type="checkbox"/>		
21. Are you aware of any allegations of suspected fraud in the organization? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>		
22. Do you have knowledge of any proven instances of fraud within the organization? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>		
23. Are you aware of anyone in the organization who is living outside their means/lifestyle or may have money issues?	<input type="checkbox"/>	<input type="checkbox"/>		
24. Have you observed anyone whose demeanor or habits may have suddenly changed?	<input type="checkbox"/>	<input type="checkbox"/>		
25. If you were assigned to audit the organization, where would you spend your time/resources?				
26. Have you personally perpetrated any operational and/or financial fraud against the agency? If yes, explain.	<input type="checkbox"/>	<input type="checkbox"/>		
Additional information:				

### **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: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			Comments
		Y	N	N/A	
1. Establish requirements for completing an internal control assessment, to include but not limited to: a. Responsible Party b. Frequency c. Communicating Results d. Corrective Action Plan		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Complete the internal control questionnaire included in this workbook.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Communicate results of the internal control assessment to appropriate parties and develop an action plan to address any deficiencies.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Verify and document timely completion of the internal control assessment and implementation of corrective action plans, if applicable.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Authority/Criteria: COV § 2.2-5205, CSA Policy Manual Section 3, Local Management Structure

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

**SECTION III: INTERNAL CONTROL**  
**INTERNAL CONTROL QUESTIONNAIRE**  
(Page 1 of 8)

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

Questions	Answer  Y/ N/ N/A	Comments
1. Have Community Policy and Management (CPMT) and Family Assessment and Planning (FAPT) Teams been established for this program?		
2. Are members of the CPMT appointed by the governing body of the local political subdivision? Please list names and affiliations of each member.		
3. Are members of the FAPT appointed by the CPMT?		
4. Does your locality have more than one FAPT? If yes, how many? Please list the members of each team, including affiliation.		
5. Is a member of the CPMT designated as the Fiscal Agent? List the name of the Fiscal Agent.		
6. Does the makeup of CPMT and FAPT membership meet the minimum requirements established by the State Executive Council?		
7. Are CPMT members appointed to represent community agencies authorized to make policy and funding decisions for their agencies?		
8. Are FAPT members appointed who have authority to access services within their respective agencies?		
9. Do any CPMT and FAPT members serve as CPMT or FAPT members for other localities? If yes, please provide specifics.		
10. Are CPMT and FAPT members required to complete Statement of Economic Interest or State and Local Government Conflict of Interest Act forms?		
11. Are members required to abstain from decision-making involving individual cases or agencies in which they have either a personal or fiduciary interest?		

**SECTION III: INTERNAL CONTROL  
INTERNAL CONTROL QUESTIONNAIRE  
(Page 2 of 8)**

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

Questions	Answer Y/N/N/A	Comments
12. Has the CPMT developed, reviewed, and/or approved interagency policies and procedures governing exchange of information, confidentiality, program and fiscal activities?		
13. Does the CPMT coordinate long-range community-wide planning in the development of resources and services for the community it serves?		
14. Are audits of the total revenues of the CPMT and its programs performed annually? By whom?		
15. Does the CPMT have a process to ensure adherence to State and locally developed CSA policies and procedures? Please describe.		
16. Does the CPMT have mechanism in place to monitor appropriate use of CSA funds? Please describe.		
17. Is there a procedure for addressing noted deficiencies?		
18. Does the CPMT meet regularly? If yes, how frequently?		
19. Are formal minutes of the meeting recorded and retained?		
20. Is the CPMT accessible to the CSA Coordinator for resolution of matters involving FAPT, local service agencies, and other related concerns in administering CSA?		
21. Is there a written job description, including duties and responsibilities of the CSA Coordinator?		
22. Is the functional reporting relationship of the CSA Coordinator appropriate for administering the local CSA program?		
<b>Conclusions Reached and Actions Needed:</b>		

**SECTION III: INTERNAL CONTROL  
INTERNAL CONTROL QUESTIONNAIRE  
(Page 3 of 8)**

**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?		
2) Are they documented? If yes, please provide.		
3) Are the goals and objectives that have been established consistent with the legislative intent of the Comprehensive Services Act and the Appropriations Act?		
4) Have quantifiable and measurable criteria been identified for use in judging the effectiveness of the program?		
5) Are the measurement criteria relevant and valid?		
6) Does management periodically gather the required data (resources used/results achieved) and evaluate the effectiveness of the program?		
7) Do the results of operations appear to be consistent with the stated goals and objectives?		
8) Does management periodically appraise the program for cost effectiveness?		
9) Are the results of evaluations of the accomplishment of goals and objectives, as well as the effectiveness of the local CSA program, communicated to stakeholders? List how and frequency of communications.		
<b>Conclusions Reached and Actions Needed:</b>		

**SECTION III: INTERNAL CONTROL  
INTERNAL CONTROL QUESTIONNAIRE  
(Page 4 of 8)**

**Objective III: To determine the compliance with policies, plans, procedures, laws, and regulations.**

Questions	Answer Y/ N/ N/A	Comments
1. Are resources readily available to CPMT and FAPT Members, CSA Coordinators, local service agencies, and private provider employees that contain the policies, plans, procedures, laws and regulations applicable to this program/unit?		
2. Are the policies and procedures in use by the local CSA program reasonably well written and facilitate work performance?		
3. Is there evidence that local agency CSA procedures are updated in a timely fashion as changes are made to them?		
4. Is there a procedure in effect to ensure that new CPMT and FAPT members, CSA Coordinators, local service agencies, and private provider employees responsible for coordinating CSA services and funding receive training in these policies, etc?		
5. Is there a procedure in effect to help ensure that all affected stakeholders are made aware of changes to these policies, etc, as they occur?		
6. Does management have procedures (controls) in place to ensure compliance with the applicable policies, etc (e.g. internal quality assurance)?		
7. Do these controls appear to be adequate as designed?		
8. Is there evidence that these controls are practiced and corrective action taken, if necessary?		
<b>Conclusions Reached and Actions Needed:</b>		

**SECTION III: INTERNAL CONTROL**  
**INTERNAL CONTROL QUESTIONNAIRE**  
(Page 5 of 8)

**Objective IV: To determine the reliability and integrity of information**

Questions	Answer Y/N/ N/A	Comments
1. Are program and financial transactions required to be authorized by appropriate FAPT and CPMT designees? In writing?		
2. Are there controls in place to help ensure that transactions are recorded accurately within established time frames?		
3. Are there controls in place to ensure that all transactions are processed? Are processed only once? Are there reconciliation procedures in place where appropriate?		
4. Are there controls in place to ensure that those transactions are processed in accordance with prescribed operational and fiscal procedures		
5. Have records management and records retention requirements been established and documented for the program?		
6. Is there a control in place to get feedback on the reliability and integrity of information produced by the program?		
7. Does this mechanism appear to be adequate as designed?		
8. Is there evidence that management performs this control and initiates corrective action when necessary?		
9. Does the turnover rate of CPMT/FAPT members and CSA Coordinators appear to be reasonable?		
10. Do CPMT/FAPT members and CSA Coordinators appear to be reasonably well experienced in their duties?		
11. Is training for CPMT/FAPT members and CSA Coordinators/employees adequate?		
12. Do CSA Coordinators have a backup in the event of an extended absence or vacancy?		
13. Is there a system of rotation for CPMT/FAPT members?		
14. Is the program operating pretty much the same now as a year ago or have there been substantial changes.		
<b>Conclusions Reached and Actions Needed:</b>		

**SECTION III: INTERNAL CONTROL  
INTERNAL CONTROL QUESTIONNAIRE  
(Page 6 of 8)**

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

Questions	Answer Y/N/ N/A	Comments
1. Is access to sensitive data/materials maintained by CSA well controlled and properly secured?		
2. Do controls (security of and accountability) over cash (if any) and valuable documents appear to be adequate?		
3. Are sensitive records physically secured from easy access by unauthorized personnel (e.g. secured file cabinets)?		
4. Are sensitive records that are stored electronically secured from easy access by unauthorized personnel (e.g. password protected; encrypted flash drives; etc)?		
5. Is there a process established for back-up and recovery of data?		
6. Is the principle of least privilege applied in granting access of secure data (based on specific needs of user; not everyone has full access)?		
7. Is staff required to participate in information security awareness training?		
8. Is there a program for rotating those with sensitive duties?		
9. Is there a reasonable separation of duties regarding requests and approval for services and/or funding?		
10. Are there reconciliation procedures in place for assets/data controlled by the unit (where practical)?		
<b>Conclusions Reached and Actions Needed:</b>		

**SECTION III: INTERNAL CONTROL**  
**INTERNAL CONTROL QUESTIONNAIRE**  
(Page 7 of 8)

**Objective VI: To determine if the entity's operations are being conducted in the most economical and efficient manner possible.**

Questions	Answer Y/N/ N/A	Comments
<u>General</u>		
1. Are CMPT, FAPT, and CSA Coordinators aware of the goals and objectives applicable to the state and local CSA programs?		
2. Are operating policies and procedures written and distributed to applicable CSA stakeholders?		
3. Are lines of authority and responsibility of the CPMT, FAPT, and CSA Coordinator clearly drawn?		
4. Are plans to accomplish the goals and objectives of the unit written and tied to the formal budget/pool fund allocations?		
5. Are CSA pool fund expenditure reimbursements and budget performance reviewed periodically? By whom?		
6. Have performance standards been set for the locally administered CSA program?		
7. Are these performance standards deemed adequate by the CPMT?		
8. Does management periodically review actual performance to the standards that have been set? Is there evidence of this review?		
<u>Staffing/Use of Personnel</u>		
9. Are CPMT, FAPT, and CSA Coordinator duties and how to perform them adequately documented?		
10. Do employees not perform redundant or unnecessary steps?		
11. Do CPMT, FAPT, and local CSA staff appear to be adequately trained to perform their duties?		
12. Does the processing flow of documents appear to be efficient and timely and designed to minimize processing steps?		

**SECTION III: INTERNAL CONTROL  
INTERNAL CONTROL QUESTIONNAIRE  
(Page 8 of 8)**

**Objective VI: To determine if the entity's operations are being conducted in the most economical and efficient manner possible.**

Questions	Answer Y/N/ N/A	Comments
13. Is all work that is performed meaningful and purposeful?		
14. Do written procedures provide for efficient use of resources?		
15. Does procurement procedures help ensure cost effective purchases?		
<b>Conclusions Reached and Actions Needed:</b>		

## **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: [http://www.doa.virginia.gov/Financial Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			Comments
		Y	N	N/A	
1. Determine whether a training plan has been established for local CSA program staff.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Maintain documentation of local CSA program staff participation in CSA related training events.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. 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.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Maintain documentation to demonstrate education of CSA stakeholders in the community. Examples could include: participant lists, meeting agendas, meeting minutes, course outlines/syllabus, etc.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Ensure that training plans/ programs are updated periodically.					
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> ; CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>	<b>Date:</b>	Click here to enter a date.
----------------------	--------------	-----------------------------

## **SECTION V: COMPLIANCE**

- **Compliance Assessment Worksheet**
  - **Compliance Supplemental Worksheets – Program Activities**
    - CPMT Management
    - FAPT Management
    - Family Engagement
    - Utilization Management/Utilization Review
    - Intensive Care Coordination
    - SPED
    - Records Management and Data Security
  - **Compliance Supplemental Worksheets – Fiscal Activities**
    - Pool Fund Eligibility
    - Budget/Expenditure Monitoring
    - Contracting/Purchasing
    - Expenditure Processing
    - Reimbursement and Supplement Requests
    - Fiscal Reporting and Data Security
- **Local CPMT Compliance Assessment Worksheet**

## SECTION V: COMPLIANCE COMPLIANCE ASSESSMENT WORKSHEET

The purpose of the Comprehensive 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 2.2-268 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 Comprehensive Services Act ([§ 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](#);"

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
<b>PROGRAM ACTIVITIES</b>					
1. Review program activities of the most recent 12 months to assess compliance with federal, state, and local laws, policies, and procedures that govern CSA services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Document the assessment using the Compliance Supplemental Worksheet- Program Activities or a reasonable facsimile.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Itemize deficiencies and the corresponding plan of action.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Document CPMT discussion of deficiencies and plan of action.					
<b>FISCAL ACTIVITIES</b>					
5. Review fiscal activities of the most recent 12 months to assess compliance with federal, state, and local laws, policies, and procedures governing CSA pool fund expenditures.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Document the assessment using the Compliance Supplemental Worksheet- Fiscal Activities or a reasonable facsimile.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Itemize deficiencies and the corresponding plan of action.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Document CPMT discussion of deficiencies and plan of action.					
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

<b>Compliance Supplemental Worksheets – Program Activities: CPMT MANAGEMENT</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine level of compliance by locally administered Community Policy and Management Teams (CPMT) with CSA laws, statutes, policies and procedures established by the State Executive Council (SEC).			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 3.1.5</b> <a href="#">COV § 2.2-5205</a>	"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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. "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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. "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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. "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 <a href="#">§ 16.1-309.3</a> ;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. "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 and a process to review the teams' recommendations and requests for funding;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. "Establish quality assurance and accountability procedures for program utilization and funds management;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	7. "Establish procedures for obtaining bids on the development of new services;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	8. "Authorize and monitor the expenditure of funds by each family assessment and planning team or a collaborative, multidisciplinary team process approved by the Council;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9. "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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Compliance Supplemental Worksheets – Program Activities: CPMT MANAGEMENT				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		Determine level of compliance by locally administered Community Policy and Management Teams (CPMT) with CSA laws, statutes, policies and procedures established by the State Executive Council (SEC).		
Reference	Description	Compliance Status		
		Full	Partial	Non
<p><b>CSA Manual 3.1.5</b> <a href="#">COV § 2.2-5205</a></p>	10. "Serve as its community's liaison to the Office of Comprehensive Services for At-Risk Youth and Families, 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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	11. "Collect and provide uniform data to the Council as requested by the Office of Comprehensive Services for At-Risk Youth and Families in accordance with subdivision D 16 of <a href="#">§ 2.2-2648</a> ;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	12. "Review and analyze data in management reports provided by the Office of Comprehensive Services for At-Risk Youth and Families in accordance with subdivision D 18 of <a href="#">§ 2.2-2648</a> to help evaluate child and family outcomes and public and private provider performance in the provision of services to children and families through the Comprehensive Services Act program. 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. 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;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	13. "Administer funds pursuant to <a href="#">§ 16.1-309.3</a> ;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	14. "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 are not used;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: CPMT MANAGEMENT</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Determine level of compliance by locally administered Community Policy and Management Teams (CPMT) with CSA laws, statutes, policies and procedures established by the State Executive Council (SEC).			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 3.1.5</b> <a href="#">COV § 2.2-5205</a>	15. "Submit to the Department of Behavioral Health & Developmental Services information on children under the age of 14 and adolescents aged 14 through 17 for whom an admission to an acute care psychiatric or residential treatment facility licensed pursuant to Article 2 (§ 37.2-403 et seq.) of Chapter 4 of Title 37.2, exclusive of group homes, was sought but unable to be obtained by reporting entities. Such information shall be gathered from the family assessment and planning team or participating community agencies authorized in <a href="#">§2.2-5207</a> . Information to be submitted shall include:" <ul style="list-style-type: none"> <li>• "The child or adolescents date of birth;"</li> <li>• "Date admission was attempted; and"</li> <li>• "Reason the patient could not be admitted into the hospital or facility; and"</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	16. "Establish policies for providing intensive care coordination services for children who are at-risk of entering, or are placed in, residential care through the Comprehensive Services Act program, consistent with guidelines developed pursuant to subdivision D 22 of <a href="#">§ 2.2-2648</a> ." <a href="#">COV § 2.2-5206</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	17. "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. 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." <a href="#">COV § 2.2-5204</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Section 3.1.5 - Duties of the CPMT Toolkit</b>	<b><a href="#">Coordinated Long Range Planning</a></b> The following features should be included in the long range planning:			
	1) Adoption of a community philosophy with respect to the provision of human services for at-risk youth and their families.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2) Identification of the current service delivery system including the following: services purchased outside of the community; the range of services provided; and an assessment of the current strengths and needs of the existing system.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: CPMT MANAGEMENT</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Determine level of compliance by locally administered Community Policy and Management Teams (CPMT) with CSA laws, statutes, policies and procedures established by the State Executive Council (SEC).			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b><u>Section 3.1.5 - Duties of the CPMT Toolkit</u></b>	3) Adoption of a planning document based on the identified philosophy and current system.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b><u>Review of Family Assessment and Planning Team Recommendation</u></b> The Community Policy and Management Team shall establish a review and approval process for Family Assessment and Planning Team or collaborative multidisciplinary team recommendations and requests for funding. This review and approval process must be according to approved policies of the State Executive Council. Policies should address the criteria by which an Individual Family Services Plan will be reviewed by the Community Policy and Management Team.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b><u>Establishment of a Chair</u></b> Each Community Policy and Management Team should establish a Chair, whose signature on CSA documents shall serve as the official signature for the Community Policy and Management Team.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b><u>Management of Funds</u></b> The Community Policy and Management Team shall establish procedures to manage funds in the interagency budget allocated to the community from the State Funds Pool, the State Trust Fund, and any other source under the Comprehensive Services Act. These procedures shall include:			
	1) Procedures to authorize and monitor the expenditure of funds by each Family Assessment and Planning Team or collaborative multidisciplinary team including tracking use of funds for services to children/families, whether they were reviewed by the Family Assessment and Planning Team or not.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2) Procedures to provide immediate access to funds for emergency services and shelter care.			
	3) Procedures that incorporate the utilization management process requirement, which includes but is not limited to the use of a uniform risk assessment instrument, in each locality's CSA process.			

<b>Compliance Supplemental Worksheets – Program Activities: CPMT MANAGEMENT</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine level of compliance by locally administered Community Policy and Management Teams (CPMT) with CSA laws, statutes, policies and procedures established by the State Executive Council (SEC).			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b><u>Section 3.1.5 - Duties of the CPMT Toolkit</u></b>	<b><u>Non-Discrimination Procedure</u></b> Community Policy and Management Teams must develop procedures to ensure that services are provided in a nondiscriminatory manner. Services provided by Community Policy and Management Teams and Family Assessment and Planning Teams shall not discriminate on the basis of race, ethnicity, sex, age, religion, socioeconomic status, handicapping conditions, or national origin.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b><u>Due Process Protections</u></b> Each Community Policy and Management Team should establish a local due process system. The minimum parameters of this system should include:			
	▪ Notice to families (at point of entry to Family Assessment and Planning Teams;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	▪ Opportunity for the family/child to be heard and defend their position; and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	▪ Timelines for review requests and Community Policy and Management Team responses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
This review process system shall not take the place of any other review process pursuant to existing state or federal law (e.g., special education, foster care).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Compliance Supplemental Worksheets – Program Activities: FAPT MANAGEMENT				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.1.5.b CSA Manual 3.2.6 <a href="#">COV § 2.2-5209</a>	1. All requests for CSA-funded treatment serves are to be assessed by FAPT or an approved collaborative, multidisciplinary team. <b>Exception: Cases involving only the payment of foster care maintenance.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Emergency placements are assessed by FAPT or an approved collaborative, multidisciplinary team within 14 days of the admission and the emergency placement is approved at the time of placement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 3.1.6 CSA Manual 3.2.8 <a href="#">COV § 2.2-5210</a>	Proceedings held to consider the appropriate provision of services and funding for a particular child, family or both who have been referred to FAPT 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 3.2.5 <a href="#">COV § 2.2-5208</a>	FAPT Team, in accordance with policies developed by the CPMT shall:			
	1. Provide for family participation in all aspects of assessment, planning, and implementation of services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. "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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. 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 the Family Assessment and Planning Team in its deliberations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FAPT MANAGEMENT				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.2.5 <a href="#">COV § 2.2-5208</a>	5. Develop an individual family services plan (IFSP) for youths and families reviewed by the Team that provides for appropriate and cost-effective services;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. For each child entering or in residential care, in accordance with the policies of the CPMT developed pursuant to subdivision 17 of <a href="#">§ 2.2-5206</a> , the Family Assessment and Planning Team or approved alternative multidisciplinary team, 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, (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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	7. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>FAPT MANAGEMENT</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.2.5 <a href="#">COV § 2.2-5208</a>	8. Refer the youth and family to community agencies and resources in accordance with the individual family services plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Other criteria that are not case specific:			
	1. Identify children who are at risk of entering, or are placed in, residential care through the Comprehensive Services Act program who can be appropriately and effectively served in their homes, relatives' homes, family-like settings, and communities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Recommend to the Community Policy and Management Team expenditures from the local allocation of the state pool of funds; and"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. 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."	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 3.2.7 <a href="#">COV § 2.2-5210</a>	1. All public agencies that have served a family or treated a child referred to a Family Assessment and Planning Team shall cooperate with this team.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 3.5 <a href="#">COV § 2.2-2648.D.13</a> <a href="#">CSA Documentation Inventory</a>	Uniform documentation guidelines approved by the State Executive Council address the minimum child-specific documentation required to demonstrate compliance with the Comprehensive Services Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>FAPT MANAGEMENT</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 4.3.1 <a href="#">COV § 2.2-5211 C</a>  <a href="#">2010 Appropriations Act, Chapter 874, Item 274 § B.2.d</a>	Pursuant to <a href="#">§2.2-5200</a> , Code of Virginia, Community Policy and Management Teams shall seek 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."	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 4.3.4 <a href="#">COV § 2.2-5211 E.</a>	1. For court referrals to FAPT, the FAPT making the assessment shall make a report of the case or forward a copy of the individual family services plan to the court within 30 days of the court's written referral to the CPMT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. 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 family assessment and planning team, the court shall request the community policy and management team to submit a second report characterizing comparable levels of service to the requested level of service.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Services ordered pursuant to a disposition rendered by the court pursuant to this section shall qualify for funding as appropriated under this section.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 4.4.1 <a href="#">Restrictions on Pool Fund Usage Toolkit</a> <a href="#">COV § 2.2-5211.1</a>	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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>FAPT MANAGMENT</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">CSA Manual 4.4.1 Restrictions on Pool Fund Usage Toolkit COV § 2.2-5211.1</a>	2. 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 community policy and management team.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. CPMT, FAPT 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 8.1	1. "...the Family Assessment and Planning Team or approved alternative multidisciplinary team, in collaboration with the family, shall .... (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;" <a href="#">COV § 2.2-5208 (5)</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: FAMILY ENGAGEMENT PLANNING</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Determine whether a family engagement policy and procedure has been established by the CPMT. Review the established policy and procedure to verify 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 as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.1.5.c  <a href="#">Family Engagement Policy adopted by SEC</a>  <a href="#">Guidance for CPMTs on Family Engagement</a>	1. Policy Statement #2: Family members whose participation must be provided for through CPMT policies and practices include those who are impacted by or involved in the delivery of such services. Efforts must be made to include: (see items a through f).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Policy Statement #3: CPMTs must have written policies for FAPT/MDT agencies that outline the processes that will insure the best chance of family involvement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Policy Statement #4: The CPMT is responsible for providing policies for FAPTs/MDTs that insure consistent, efficient, and effective CSA services to children and their families. Redundant or duplicative processes must be streamlined across child-serving agencies to promote family engagement but CPMT policy also must describe how they align and integrate with those of the CPMT's member agencies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Policy Statement #5: Family involvement and participation are most effective when ... when the youth and family participate in all aspects of assessment, planning and implementation of services. COV § 2.2-5207 provides a process for and encourages the formation of child- and family-specific teams through a locality's FAPT and/or MDT processes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. Policy Statement #6: CPMTs are responsible for instituting policies and practices that inform, prepare, and support family members for their participation in CSA, throughout the duration of their CSA services. This should be accomplished through communication and interaction methods that are appropriate to the family's cultural and linguistic needs and preferences, including providing written material to family members.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: Utilization Mgmt/Utilization Review</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether a utilization management/utilization review (UM/UR) policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to UM/UR policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 8.1</b> <a href="#">COV § 2.2-2648 D.15</a> <a href="#">COV § 2.2-5206 (13)</a> <a href="#">COV § 2.2-5208 (5)</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B. 3.</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B.7.</a> <b>Section 8.1 - Utilization Management Tool Kit</b>	1. Each locality receiving funds for activities under the Comprehensive Services Act shall have a locally determined utilization management plan following the guidelines or use of a process approved by the Council for utilization management, covering all CSA funded services;" <a href="#">COV § 2.2-2648 D.15</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The CPMT shall... Review and analyze data in management reports provided by OCS in accordance with subdivision D 18 of <a href="#">§ 2.2-2648</a> to help evaluate child and family outcomes and public and private provider performance in the provision of services to children and families through the Comprehensive Services Act program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. 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, relative's homes, family-like setting, or their community;" <a href="#">COV § 2.2-5206 (13)</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. "Each locality receiving funds for activities under the Comprehensive Services Act (CSA) shall have a utilization management process, including a uniform assessment, approved by the State Executive Council, covering all CSA services." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B. 3.</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Utilization Management/Utilization Review</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether a utilization management/utilization review (UM/UR) policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to UM/UR policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 8.1</b> <a href="#">COV § 2.2-2648 D.15</a> <a href="#">COV § 2.2-5206 (13)</a> <a href="#">COV § 2.2-5208 (5)</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B. 3.</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B.7.</a> <b>Section 8.1 - Utilization Management Tool Kit</b>	6. Determine whether procedures adopted by the CPMT include "best practices" models as referenced in the following: <a href="#">Utilization Review Guidelines</a> <a href="#">Utilization Management Guidelines</a> <a href="#">Sample Documentation Inventory and Suggested Model UM Plan</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 8.1</b>	Select a sample of no less than 20% of active CSA files and verify compliance with the approved UM/UR plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: INTENSIVE CARE COORDINATION</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether an intensive care coordination (ICC) policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Select a sample of no less than 20% of ICC referrals occurring in the most recent 12 months and verify compliance. Links to ICC policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">CSA Manual 8.2</a> <a href="#">COV § 2.2-2648.D.22</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § C.3.d.</a> <a href="#">COV § 2.2-5206.17</a>	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 Comprehensive Services Act for At-Risk Youth and Families program, in accordance with guidelines developed by the State Executive Council." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § C.3.d.</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. "The Community Policy and Management Team shall... Establish policies for providing intensive care coordination services for children who are at risk of entering, or are placed in, residential care through the Comprehensive Services Act program, consistent with guidelines developed pursuant to subdivision D 22 of <a href="#">§ 2.2-2648.</a> " <a href="#">COV § 2.2-5206.17</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
See "DBHDS Appendix A" for more information on ICC Guidelines. <b><a href="#">Section 8.2 - Intensive Care Coordination Toolkit Guidelines - Revised January 10, 2011</a></b>	1. <b>Population to be Served by Intensive Care Coordination</b> a. Children should be identified to receive Intensive Care Coordination by their local Family Assessment and Planning team (FAPT). Eligible children include: b. All children who are currently in residential care. c. Children who are at risk of placement in residential care as identified by FAPTs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>INTENSIVE CARE COORDINATION</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Determine whether an intensive care coordination (ICC) policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Select a sample of no less than 20% of ICC referrals occurring in the most recent 12 months and verify compliance. Links to ICC policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">See "DBHDS Appendix A" for more information on ICC Guidelines.</a> <b>Section 8.2 - Intensive Care Coordination Toolkit</b> <a href="#">Guidelines - Revised January 10, 2011</a>	2. Providers of ICC shall be Community Services Boards (CSB's). A CSB may potentially contract with another entity to provide ICC. If a CSB contracts with another entity to provide ICC, the CSB nonetheless maintains full responsibility for ICC, including monitoring the services provided under the contract.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. CPMTs shall establish a local procedure for reimbursing CSB's for ICC. Each CSB in collaboration with the local CPMT shall establish a rate for ICC. This case rate may be billed to CSA according to local procedures established by the CPMT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. All children who receive ICC must be reviewed by the FAPT. An Intensive Care Coordinator should facilitate the review process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. The Intensive Care Coordinator shall develop a plan of services to assure that the child's needs are met in the community. The perspective and preferences of the family and the youth shall be solicited and honored in developing the plan. Any provider may provide any of the services described in the plan, as long as the provider has the expertise and qualifications to assure quality service.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. Staff shall be selected to provide ICC Coordination consistent with the Position Description attached to these guidelines. Staff functions shall include a strengths discovery and assessment process, planning, coordination and monitoring, utilization review and other appropriate functions as needed to transition or maintain a child in the community. ICC staff shall possess, at minimum, a Bachelor's degree with at least 2 years of experience in children's mental health services. Strong interpersonal skills and group facilitation skills are also essential.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>INTENSIVE CARE COORDINATION</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether an intensive care coordination (ICC) policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Select a sample of no less than 20% of ICC referrals occurring in the most recent 12 months and verify compliance. Links to ICC policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">See "DBHDS Appendix A" for more information on ICC Guidelines.</a> <b>Section 8.2 - Intensive Care Coordination Toolkit Guidelines - Revised January 10, 2011</b>	7. Caseload size should be sufficiently small to allow for the intensity required and is estimated to be 7 to 12 children. Specific caseloads shall be determined locally based on local need, complexity of cases, geographic differences (such as need to travel), time necessary to work with families to develop services and supports in preparation for the child's return home, and other locality-specific circumstances.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	8. All cases shall be referred to the CSB for ICC by the FAPT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9. Parents, family members and youth shall be involved in a meaningful way that honors their choices and preferences in developing the service plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	10. A comprehensive strengths discovery/ assessment with the child and family shall be completed by the Intensive Care Coordinator on each child within 30 days of referral by the FAPT team.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	11. The intensive care coordinator will begin the Individual and Family Services Plan (IFSP) based on the strengths discovery/assessment. The IFSP will be further defined through input from the family, the youth and the FAPT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Compliance Supplemental Worksheets – Program Activities: SPECIAL EDUCATION (SPED)				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
<p>CSA Manual 4.3.3 <a href="#">COV § 2.2-5211 D.</a> See "DOE Appendix B" for Age of Eligibility Requirements <b>Section 4.3.3.a – "Wrap Around Services for Students with Disabilities" Toolkit</b></p>	<p>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 <a href="#">§ 22.1-213</a> 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 individualized education program (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) of Chapter 13 of Title 22.1, and the 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." <a href="#">COV § 2.2-5211 D.</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. Consistent with a student's eligibility for special education services under IDEA, if the special education student with mandated services enters the school year at 21 years of age, that child may remain under the mandated, special education category of CSA funding until completion of the IEP academic year. Eligibility would terminate upon the student's completion of that IEP academic year. See <a href="#">"DOE Appendix B" for Age of Eligibility Requirements</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>	<p>Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</p>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<p>CSA Manual 4.3.3.a <a href="#">COV § 2.2-5211 D.</a> <a href="#">OCS Policy Memo</a> <a href="#">January 28, 2011</a> <a href="#">Superintendent's</a> <a href="#">Policy Memo #021-11</a></p>	<p>"The special education mandate cited in §2.2-5211 B1 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."</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>APPENDIX A – Dept. of Behavioral Health &amp; Developmental Services <b><u>Appendix B –</u></b> <b><u>Department of</u></b> <b><u>Education Toolkit</u></b></p>	<p>1. The special education target population defined in the (Code of Virginia) includes those "children placed for purposes of special education in approved private school educational programs, previously funded by the Department of Education through private tuition assistance." This includes all children whose IEP's include placements in private day school or private residential facilities.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. When an IEP has been developed for a private day school or private residential program, multidisciplinary planning may be employed to consider services outside of the IEP that will enhance the student's benefit from the educational services and/or facilitate a more effective return to the public schools.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>3. Federal and state requirements prohibit any entity from changing the services or placement specified on the IEP. The FAPT and the CPMT are likewise prohibited from changing the IEP, including services and placement specified. The CPMT must ensure that no local policies or procedures interfere with the provisions and protections afforded to students with disabilities under federal and state laws and regulations. The CPMT holds responsibility for establishing policies and procedures to ensure access to funds for eligible children, i.e., students with IEP's directing placement into private education programs.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>APPENDIX A –</b> Dept. of Behavioral Health & Developmental Services <b><u>Appendix B –</u></b> <b><u>Department of Education Toolkit</u></b>	4. Following determination of eligibility, an Individual Education Program (IEP) is developed for the child. The IEP will address the special education and related services the child needs to benefit from the general curriculum and identify the "least restrictive environment" (LRE) in which the child's needs can be met. The local school division develops the IEP to assure the child receives a free and appropriate public education (FAPE) as required by the IDEA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. The IEP team develops the IEP considering the strengths of the child, concerns of the parents for the child's education, and evaluation results. It includes annual, measurable goals to address the needs identified, special education and related services and supplementary aids and services to be provided, and a statement of the program modifications or supports for school personnel that will be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. Beginning when a child is age 14, the IEP must address transition to adult services. By the time the child is 16, the IEP shall include a statement, if appropriate, of interagency responsibilities or any linkages.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	7. When an IEP for private day services or private residential services is reviewed by the FAPT, the role of the team includes the recommendation for funding, collection of uniform assessment and demographic data required for reporting, consideration of the child/family needs beyond the IEP, collecting information from IEP reviews and progress reporting for purposes of documenting utilization review, and assuring coordination of services for those children served by multiple agencies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
APPENDIX A – Dept. of Behavioral Health & Developmental Services <u>Appendix B –</u> <u>Department of</u> <u>Education Toolkit</u>	8. An IFSP may be developed by the FAPT to address non education needs of the child and/or the child’s family. Such needs would arise from the child’s disability and require services that are not a part of the child’s SPED program. The services would be designed to increase the child’s ability to be successful in the home, community, or school setting. Services might be provided to a student receiving SPED services in the public school, a private day school, or in a residential program as needed to maintain the student in, or transition the student to, a less restrictive home, community, or school placement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9. The CSA utilization management (UM) process must be applied to SPED services in conformity with SPED laws and regulations. IDEA requires that students with disabilities be provided services in accordance with their IEP’s and that funding for such services must be "sum sufficient," i.e., these services must be provided regardless of cost. IDEA requires at least annual review of the IEP and progress reporting at least as often as reporting is provided to parents of students without disabilities, to be completed by the IEP team and must be based upon the goals in the IEP. Each locality must ensure that it’s UM processes do not interfere with the IDEA protections provided to each individual student with a disability.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	10. Compliance with federal laws and protections to children with disabilities requires that CSA processes not impede a child’s access to the services specified in his/her IEP, e.g., a parent may not be required to attend a FAPT meeting in order to gain access to funding for placement or services specified in a child’s IEP. Clear explanation must be given to the parent/family that the purpose of FAPT planning is not connected to the child’s SPED program, i.e., to his right to a free appropriate public education.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>APPENDIX A –</b> Dept. of Behavioral Health & Developmental Services <b>Appendix B –</b> <u>Department of Education Toolkit</u>	11. Schools must secure parental consent whenever any non-school employee is to review the child’s confidential record. In the absence of parental consent, the schools cannot share information with others including CSA entities. The absence of parental consent for the release of student records may not prevent the authorization of funding or implementation of services in accordance with a student’s IEP.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	12. All children placed in a private placement through CSA who are eligible for SPED shall have an IEP. The local school division that is part of the CSA Team that placed the child shall be responsible for the IEP.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	13. For a non-educational placement for a student with a disability (a placement made by another agency or the CSA team as a whole), the school division that is part of the CSA team shall revise the IEP to reflect the non-educational placement. The IEP shall reflect that the student is now in a non-educational placement and shall address the student’s SPED needs while in the placement. The revised IEP for a non-educational placement is not considered the source of the residential placement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	14. For any child placed into a private SPED school through CSA, for educational or non-education reasons, the responsibility for compliance with SPED requirements remains with the school division on the CPMT responsible for the placement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	15. Prior to placing a non-foster care child cross-jurisdictionally; it is imperative that the CPMT determine if the child can enroll in the local school division. If the school board’s policies do not permit enrollment, other arrangements must be made for either the child’s education or living arrangement. The CPMT shall not make a placement for a child which denies the child’s access to education.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals made by local school divisions occurring in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
APPENDIX A – Dept. of Behavioral Health & Developmental Services <b>Appendix B – Department of Education Toolkit</b>	16. The CSA Pool cannot pay tuition to a local school division. If a child who is not in foster care is placed for non-educational reasons in a group home in a locality which charges tuition for non-resident students, the local school division on the placing CSA team will be responsible for payment of tuition. This underscores the importance of working with the local school division representatives on the FAPT/CPMT prior to out-of-jurisdiction placements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	17. Consistent with a student’s eligibility for SPED services under IDEA, CSA is responsible for funding private school SPED services specified in the IEP for a student who has not reached his/her 22nd birthday on or before September 30 of the school year. A child with a disability whose 22nd birthday is after September 30 remains eligible for the remainder of the school year. The CSA pool is responsible to fund the following special education services: <ul style="list-style-type: none"> <li>▪ All services delineated in an IEP which specifies placement into a private day special education facility or a private residential facility,</li> <li>▪ The special education costs associated with the non-educational placement of a student with a disability into a private residential program by a participating CSA entity or CSA team (FAPT/MDT/CPMT).</li> <li>▪ Placement into a private school which is ordered by a hearing officer as a result of a due process hearing or which is part of a legally binding mediation agreement between a parent and school division.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>SPECIAL EDUCATION (SPED)</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals made by local school divisions in the most recent 12 months and verify compliance. Links to SPED policy and related guidance are included for reference. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
APPENDIX A – Dept. of Behavioral Health & Developmental Services <u>Appendix B –            Department of            Education Toolkit</u>	18. Federal law requires that all SPED services must be provided at no cost to parents, no co-payment may be charged to a parent for any service specified on the IEP or otherwise provided as a requirement of a FAPE. Thus, IEP services funded by CSA (i.e., private day and private residential services) are exempt from the parental co-payment. For a student with a disability placed into a residential program for non-educational reasons (e.g., by social services), the educational portion of the placement is exempt from the parental co-payment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	19. When a CSA team places a student with a disability into a residential treatment program and utilizes Medicaid funding for the treatment services, the cost for educational services is the responsibility of the CSA pool.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	20. If a student with a disability is placed into a residential program by his/her parents for non-educational reasons, the school division of the parent's residence is responsible for the provision of a FAPE. If the school division determines that private day or private residential services are necessary to meet the needs of the student, and develops an IEP for those services, the services are funded by the CSA pool.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	21. If a student without a disability is placed into a residential program by his/her parents for non-educational reasons, neither the local school division or the CSA team have any obligation to pay for educational services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	22. IDEA requires that SPED services must be provided as soon as possible following the development of an IEP. Services may not be delayed while funding is being determined. In the instance of any interagency dispute that may interfere with the provision of a FAPE to a student with a disability the local school division shall provide or pay for such services and claim reimbursement from the CPMT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Program Activities: RECORDS MGMT &amp; DATA SECURITY</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	<ol style="list-style-type: none"> <li>1. Determine whether a records management policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy and related guidance are included for reference.</li> <li>2. Review records retention files for documentation of completed destruction schedules.</li> <li>3. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</li> </ol>			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.1.6 <a href="#">COV § 2.2-5210</a>	<ol style="list-style-type: none"> <li>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." <a href="#">COV § 2.2-5210</a></li> <li>2. "Utilizing a secure electronic database, the CPMT and the family assessment and planning team shall provide the Office of Comprehensive Services for At-Risk Youth and Families with client-specific information from the mandatory uniform assessment and information in accordance with subdivision D 11 of § <a href="#">2.2-2648</a>." <a href="#">COV § 2.2-5210</a></li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CSA Manual 3.2.8	"All public agencies that have served a family or treated a child referred to a 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." <a href="#">COV § 2.2-5210</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>RECORDS MANAGEMENT AND DATA SECURITY</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	<ol style="list-style-type: none"> <li>1. Determine whether a records management policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy and related guidance are included for reference.</li> <li>2. Review records retention files for documentation of completed destruction schedules.</li> <li>3. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</li> </ol>			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 3.5 <a href="#">COV § 2.2-2648.D.13</a>  <a href="#">CPMT Guidelines for Records Management</a>  <a href="#">Retention and Destruction of Records</a>  <a href="#">Duplicate Records</a>	Uniform documentation guidelines approved by the SEC address the minimum child-specific documentation required to demonstrate compliance with the CSA.			
	1. Each CPMT should adopt written policies and establish procedures for management of the IFSP and other documentation consistent with minimum state and federal requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Each CPMT is reminded that they should also adhere to requirements of the Family Education Rights and Privacy Act and the Code of Virginia regarding education records. Specifically, parental consent is required to release education records. Education records are broadly defined as all records maintained by the education agency.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. The retention of and destruction of <u>original</u> records is based on the agency's retention and destruction policy under whose purview the record originated. The State Library of Virginia is responsible for managing the retention and destruction of all public agency records and has developed schedules applicable to each agency. Record officers, who must sign off on forms before destroying any public record, are located throughout the State of Virginia.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Duplicates ("copies" of convenience) of original records are not under the purview of the destruction schedule and therefore could be purged as long as the original records are maintained by the appropriate originating agency.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.6.2</b> <b>Section 4.6.2 - Mandatory Uniform Assessment Instrument Toolkit</b> <a href="#">CANS Information</a>	Users must establish an account prior to use of this website. Only CANVaS Designated Super Users/Report Administrators or public agency case managers who are responsible for CANS assessments of children receiving CSA-funded services may establish accounts. The online CANS assessment tool is located at <a href="https://canvas.csa.virginia.gov">https://canvas.csa.virginia.gov</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RECORDS MANAGEMENT AND DATA SECURITY				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>	<ol style="list-style-type: none"> <li>1. Determine whether a records management policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy and related guidance are included for reference.</li> <li>2. Review records retention files for documentation of completed destruction schedules.</li> <li>3. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</li> </ol>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">Policies and Procedures for Access to CANVaS December 2010</a>	<p><b>Information entered into CANVaS is confidential.</b> Individuals who have access to CANVaS must realize the importance of maintaining the confidentiality of the information and ensure that it is not shared with anyone who is not authorized.</p>			
	<ol style="list-style-type: none"> <li>1. All users of CANVaS, no matter what role or level of access, must sign a Users' agreement. The Users' agreement will be authorized by a case manager's supervisor and the Designated Super User/Report Administrator (DSU/RA) or the Office of Comprehensive Services, depending on the role of the user.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>2. Access requires verification of certification from the Cummunimetrics website.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>3. Case manager access is limited to the assessments they enter and the reports generated by those assessments.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>4. CANVaS password must be: <ul style="list-style-type: none"> <li>• a minimum of eight characters,</li> <li>• not based on a single dictionary word and;</li> <li>• include three of the following four: <ul style="list-style-type: none"> <li>○ a number,</li> <li>○ a letter,</li> <li>○ combination of upper and lower case</li> <li>○ special characters.</li> </ul> </li> </ul> </li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>5. If a case manager leaves employment, the account must be deactivated. The agency supervisor must contact either the Help Desk directly or the Designated Super User/Report Administrator who will contact the Help Desk to de-activate the account.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>6. It is recommended that DSU/RAs periodically check the listing of case managers to ensure the accounts of those who have left employment have been de-activated.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RECORDS MANAGEMENT AND DATA SECURITY				
<p><b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b></p>				
<p><b>PROCEDURE</b></p>	<ol style="list-style-type: none"> <li>1. Determine whether a records management policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy and related guidance are included for reference.</li> <li>2. Review records retention files for documentation of completed destruction schedules.</li> <li>3. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</li> </ol>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<p><a href="#">Policies and Procedures for Access to CANVaS December 2010</a></p>	<p>7. Designated Super Users will be identified by each locality to serve as Report Administrators. Report Administrators will authorize case manager access to CANVaS and will have access to the locality's CANVaS data. Designated Super Users/Report Administrators (DSU/RA) must have been trained and certified by Dr. John Lyons.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>8. Requests to become the DSU/RA or RA for a locality must be sent to the Office of Comprehensive Services. Each designated individual must read and sign the Users' agreement, have their supervisor sign, and fax or mail the form to OCS for confirmation.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>9. When an individual will no longer serve as a Designated Super User/Report Administrator, he or she must notify OCS and the RCR Help Desk to remove his/her name from the authorized DSU/RA or RA list.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>10. Designated Super Users/Report Administrators must verify that the case manager is currently certified on use of the CANS. (The case manager should provide you with a copy of the printed certification from the Communimetrics site.) You may also verify certification on your locality's listing on the Communimetrics site at <a href="http://www.communimetrics.com/VirginiaCSA/Default.aspx">www.communimetrics.com/VirginiaCSA/Default.aspx</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>11. Designated Super Users/Report Administrators should keep a copy of the case manager agreements they have authorized. It may be helpful to create a listing of names, certification dates and e-mail addresses.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>12. Certification on the use of the Virginia Child and Adolescent Needs and Strengths (CANS) assessment must be renewed annually. The CANVaS online system will not permit a user whose CANS certification has expired to enter assessments.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Compliance Supplemental Worksheets – Fiscal Activities: POOL FUND ELIGIBILITY				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">CSA Manual 4.2.2 COV § 2.2-5211 B.</a>	<p>1. Children for whom foster care services, as defined by <a href="#">§ 63.2-905</a>, are being provided to prevent foster care placements, and children placed through parental agreements, entrusted to local social service agencies by their parents or guardians or committed to the agencies by any court of competent jurisdiction for purposes of placement in suitable family homes, child-caring institutions, residential facilities or independent living arrangements, as authorized by <a href="#">§ 63.2-900</a>;" See "<a href="#">DSS Appendix D</a>" for <a href="#">further information</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. "Children placed by a juvenile and domestic relations district court, in accordance with the provisions of <a href="#">§16.1-286</a>, 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 <a href="#">§ 16.1-284.1</a>" See "<a href="#">DJJ Appendix C</a>" <a href="#">Toolkit regarding non-mandated youth</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>3. Children committed to the Department of Juvenile Justice and placed by it in a private home or in a public or private facility in accordance <a href="#">§ 66-14</a> ."</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><a href="#">Interagency Guidelines for CHINS Intro</a></p> <p><a href="#">CHINS Eligibility Checklist</a></p>	<p>The Guidelines provide for the Family Assessment and Planning Team (FAPT) to determine that a child meets the statutory definition of a "child in need of services". An Eligibility Checklist is included which sets forth the statutory criteria for use in making this decision. Children with severe mental health needs may be eligible for CSA funding if determined to be in need of services by either the Court or the FAPT. Services may be provided under the Guidelines in one of two ways; either through foster care prevention services in the home and community or with residential treatment through the parental agreement process described in <a href="#">§63.2-905</a>.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Fiscal Activities: BUDGET AND MONITORING</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether the CPMT has mechanisms in place for budgeting and monitoring use of CSA fund allocations. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 3.1.5 Section 3.1.5 - Duties of the CPMT Toolkit</b>	<p><u><a href="#">Quality Assurance and Accountability</a></u> The CPMT shall establish a quality assurance mechanism to ensure that the pool funds are used according to and in agreement with the philosophy of the Act. At a minimum, this mechanism shall include accountability for the decisions made by the FAPT and/or the collaborative multidisciplinary teams in the following areas:</p> <ol style="list-style-type: none"> <li>1. Fund usage; and</li> <li>2. Services received by children and their families.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.3.1 <u><a href="#">COV § 2.2-5211 C</a></u>  <u><a href="#">2010 Appropriations Act, Chapter 874, Item 274 § B.2.d</a></u></b>	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 identified in subdivisions B1, B2 and B3 and (ii) meet relevant federal mandates for the provisions of these services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The CPMT shall anticipate to the best of its ability the number of children for whom such services will be required and reserve from its state pool allocation to meet these needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Pursuant to <u><a href="#">§2.2-5200</a></u> , Code of Virginia, CPMT's shall seek 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."	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.5.1 Formula Allocation Toolkit</b>	<p><u><a href="#">Protection Level Funds</a></u> Each year localities may protect a specific amount of the total state pool to provide services to the targeted non-mandated and other eligible populations. As long as the protected funds are attached to a specific targeted non-mandated or eligible child, a locality may maintain those funds and still apply for and receive supplemental funds for the mandated populations.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>BUDGET AND MONITORING</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Determine whether the CPMT has mechanisms in place for budgeting and monitoring use of CSA fund allocations. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<a href="#">CSA Manual 4.5.2 2011 Appropriation Act, Chapter 890, Item 274 § C.2.</a>  <a href="#">Local Match Rate Guidance</a>	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 CSA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The funds used for local match must be "cash" (i.e., in-kind costs cannot be used). Matching funds may be from any source other than state or federal funds received under CSA, unless otherwise prohibited.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Fiscal Activities: CONTRACTING AND PURCHASING</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Determine whether contracting and purchasing policy and procedure has been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Select a sample of no less than 20% of the current contracts and/or purchasing agreements established during the most recent 12 months and verify compliance. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 3.1.5</b>	Every such team shall:			
	1. " Establish procedures for obtaining bids on the development of new services;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. "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 are not used;"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b><u>Section 3.1.5 - Duties of the CPMT Toolkit</u></b>	<b><u>Responsibility for Signing Contracts and Agreements</u></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	1. The Community Policy and Management Team must identify the person/agency responsible for signing placement agreements and contracts.			
	2. In accordance with the requirements contained in HB1720 General Assembly Session, a standardized provider contract has been developed while HB1720 does not mandate the use of the contract; local governments are encouraged to use this resource. <a href="http://165.176.249.117/html/news/stdcontract.doc">http://165.176.249.117/html/news/stdcontract.doc</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.3.5 <u>Section 4.3.5 - Provision of Services Toolkit</u></b>	<b><u>Private &amp; Public Provider Purchases</u></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	1. Pool Funds may be used to purchase services from public or private agencies, provided such purchase arrangements are consistent with existing mandates and do not supplant current funding.			
	<b><u>Service Development</u></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The Comprehensive Services Act allows localities to develop services (including contractual services), and to be reimbursed for those services from Pool Funds, as long as the reimbursement is for services purchased for specifically identified youths and their families.			

<b>Compliance Supplemental Worksheets – Fiscal Activities: EXPENDITURE PROCESSING</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 4.3.1a</b>	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. In the event that the child/family's legal residence changes, the following policy should govern payment for services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	1. The former CPMT jurisdiction is responsible for (a) providing written notification to the new CPMT jurisdiction of the fact that the child/family's residence has changed and (b) forwarding child's/family's IFSP and other FAPT documents to the new CPMT jurisdiction; and (c) informing service providers of changes in the child/family's residence.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The former CPMT jurisdiction pays for services until 30 calendar days after the new CPMT receives written notification of the child/family's residence in the new CPMT locality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. When the residence of the child/family transfers to a new CPMT jurisdiction, the receiving CPMT jurisdiction must review the current IFSP and adopt or revise and implement within 30 calendar days.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Community Policy and Management Team jurisdictions are encouraged to: <ul style="list-style-type: none"> <li>a. Keep track of the child/family's residence status;</li> <li>b. Notify receiving Community Policy and Management Teams as soon as they know of the child/family's pending move, to facilitate planning; and</li> <li>c. To work cooperatively to resolve issues related to legal residence.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EXPENDITURE PROCESSING				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
<p><b>CSA Manual 4.3.3</b> <a href="#">COV § 2.2-5211 D.</a></p>	<p>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 <a href="#">§ 22.1-213</a> 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 individualized education program (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 (SPED) services and IEP shall remain, in compliance with the provisions of federal law, Article 2 (§ 22.1-213) of Chapter 13 of Title 22.1, and the 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 SPED services. The financial and legal responsibility for such SPED services shall remain with the placing jurisdiction, unless the placing jurisdiction has transitioned all appropriate services with the individual.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. Consistent with a student's eligibility for SPED services under IDEA, if the SPED student with mandated services enters the school year at 21 years of age, that child may remain under the mandated, SPED category of CSA funding until completion of the IEP academic year. Eligibility would terminate upon the student's completion of that IEP academic year. <a href="#">See "DOE Appendix B" for Age of Eligibility Requirements</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>CSA Manual 4.3.3.a</b></p>	<p>3. The SPED mandate cited in §2.2-5211 B1 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.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EXPENDITURE PROCESSING				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>		<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>		
Reference	Description	Compliance Status		
		Full	Partial	Non
<p><b>CSA Manual 4.3.4</b> <a href="#">COV § 2.2-5211 E.</a></p>	<p>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.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>CSA Manual 4.3.5</b> <b>Provision of Services Toolkit</b> <a href="#">COV § 2.2-5211</a> <a href="#">COV § 2.2-5209</a></p>	<p>1. Basic maintenance needs (including, but not limited to, clothing, personal allowance, etc.) may be reimbursed from Pool Funds if the maintenance needs are specific to an individual child. <a href="#">Maintenance and Support Expenses for Children &amp; Families</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. Pool Funds may be used to purchase services from public or private agencies, provided such purchase arrangements are consistent with existing mandates and do not supplant current funding. <a href="#">Private &amp; Public Provider Purchases</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>3. The Comprehensive Services Act allows localities to develop services (including contractual services), and to be reimbursed for those services from Pool Funds, as long as the reimbursement is for services purchased for specifically identified youths and their families. <a href="#">Service Development</a></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>CSA Manual 4.4</b> <b>Restrictions on Pool Fund Usage Toolkit</b></p>	<p><a href="#">Case Management</a></p> <p>1. Case management services related to administering the Comprehensive Services Act cannot be reimbursed with Pool Funds. <b>For example</b>, case management services that are provided by the Family Assessment and Planning Teams, as described in <a href="#">COV § 2.2-5208</a> of the Comprehensive Services Act, cannot be paid for with Pool Funds.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>2. Case management services that are beyond each agency's scope of responsibility, provided as direct services for children and their families, and which add demonstrated value necessary to meet child-specific needs <u>may</u> be purchased with Pool Funds.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EXPENDITURE PROCESSING				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>	<p>Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 4.4</b> <b>Restrictions on Pool</b> <b>Fund Usage Toolkit</b>	<a href="#">Supplanting of Funds</a> 3. Pool Funds cannot be used to supplant federal or state funds supporting existing programs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<a href="#">Administrative Costs</a> 4. Pool Funds must not be used for administrative expenses that may be incurred for support services to the CPMT and the FAPT.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.4.2</b> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § E.</a>	CPMTs shall use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.5.4</b> <a href="#">COV § 2.2-5206 (3)</a> <a href="#">COV § 2.2-5208 (6)</a> <b>2011 Appropriations Act, Chapter 890, Item 274 § F.</b> <a href="#">Sliding Fee Scale Guidelines adopted by the SEC February 23, 2000</a> <b>Section 4.5.4 - Sliding Fee Scale Toolkit</b>	1. Pursuant to subdivision 3 of § 2.2-5206, Code of Virginia, CPMTs shall enter into agreements with the parents or legal guardians of children receiving services under CSA. The Office of Comprehensive Services (OCS) shall be a party to any such agreement. If the parent or legal guardian fails or refuses to pay the agreed upon sum on a timely basis and a collection action cannot be referred to the DCSE, upon the request of the CPMT, OCS shall make a claim against the parent or legal guardian for such payment through the Department of Law's Division of Debt Collection in the Office of the Attorney General.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<a href="#">Criteria For Parental Payment Assessments</a> 2. Parents of children in out-of-home placements not be charged a payment for services in addition to the child support order. The noncustodial parents of children in out-of-home care are to be referred to the DCSE for the collection of child support. An addition payment for services coupled to the payment of child support may be considered in the future, but the workgroup recommended that both not be collected at this time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>EXPENDITURE PROCESSING</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	Select a sample of no less than 20% of FAPT referrals processed in the most recent 12 months. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 4.5.4</b> <a href="#">COV § 2.2-5206 (3)</a> <a href="#">COV § 2.2-5208 (6)</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § F.</a> <a href="#">Sliding Fee Scale Guidelines adopted by the SEC February 23, 2000</a> <b><u>Section 4.5.4 - Sliding Fee Scale Toolkit</u></b>	<a href="#">Criteria For Parental Payment Assessments</a> 3. Parents and legal guardians of children receiving in-home care are expected to contribute financially to the cost of services. Charge parents of children in IN-HOME CARE a standard parental co-payment based both on the ability of each parent to pay and the cost of the service. Each local government will be expected to develop policies to assess this fee. Local governments are encouraged to assess a fee based on a locally developed scale. Some local jurisdictions have modified the child support scale and currently use it as the basis of a CSA fee. Refer to <a href="#">Guidance on Sliding Fee Scale</a> dated March 2000 for further guidance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Fiscal Activities: REIMBURSEMENT &amp; SUPPLEMENT REQUESTS</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Examine all expenditure reimbursements and supplemental requests processed during the 12 month period of review. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 4.5.3</b> <a href="#">COV § 2.2-5211 C, 2011 Appropriations Act, Chapter 890, Item 274 § B.3.</a>	1. Effective immediately, with the exception of the final year-end report referenced above, request for reimbursement of local pool expenditures must be submitted no later than thirty (30) days after the close of the quarter in which the expenditure was paid. Localities may continue to report as often as monthly, but must report at least every quarter.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. A report should be submitted at the end of the quarter even if it indicates no expenditures were made during that quarter.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. "Effective for the quarter ending September 30, 1995, localities that have not submitted their Quarterly Services Utilization report will have their pool reimbursements held in abeyance until the quarterly report is submitted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual Section 4.5.3 - Disbursement Procedure Toolkit</b>	<a href="#">Disbursement Procedure Overview</a> 1. Each locality receiving funds for activities funded by the Comprehensive Services Act (CSA) shall have an approved utilization management process covering all CSA services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. The locality must expend funds and then will be reimbursed for the state-share of the expense by the State Fiscal Agent. Subsequent reimbursements may be made after the locality has filed and the state has approved a supplemental allocation request.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Requests for reimbursement must be submitted electronically by the local fiscal agent on the most current Comprehensive Services Act Reimbursement Request forms, and payment of the state-share will be made by the State Fiscal Agent to the fiscal agent of the CPMT. In the case of a multi-jurisdictional CPMT, the fiscal agent must submit separate requests for each locality.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Costs for which reimbursement is being claimed must be reported as pertaining to the fiscal year in which the service was provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REIMBURSEMENT and SUPPLEMENT REQUESTS				
<p><b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</p>				
<b>PROCEDURE</b>	<p>Examine all expenditure reimbursements and supplemental requests processed during the 12 month period of review. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.</p>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual Section 4.5.3 - Disbursement Procedure Toolkit</b>	<a href="#">Disbursement Procedure Overview</a> 5. Local governments may request a waiver of this policy in the event of extenuating circumstances beyond the control of the local government. This request must be made in writing to the Business Manager of the OCS explaining the extenuating circumstances.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<a href="#">Reimbursements-Recovery of Funds from Other Sources</a> 6. Funds recovered and paid to the pool from individual client accounts (i.e., special welfare accounts, Social Security, SSI, Veterans Administration benefits, client trusts, parental contributions/fees and other funds collected for specific Comprehensive Services Act eligible children) must be treated for accounting purposes as expenditure refunds. These expenditure refunds and a breakdown of their sources must be reported on the Reimbursement Request form.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CSA Manual 4.5.5 Section 4.5.5 - Supplemental State Allocation Toolkit</b> <a href="#">Supplemental State Allocation Overview</a> <a href="#">Supplemental Allocation Requirements</a>	1. Should there not be sufficient funds in the locality's allocation to accommodate unanticipated costs of serving the mandated population, the CPMT may apply to the State Executive Council for a supplemental allocation for the state-share of the unanticipated costs. In the case of a multi-jurisdictional CPMT, the application is submitted for an individual participating locality.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. "...funds ... shall be set aside to pay for the state share of supplemental requests from localities that have exceeded their state allocation for mandated services." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B.2.a.</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. "Localities requesting funding from the set aside in paragraph 2.a and 2.b must demonstrate compliance with all CSA provisions to receive pool funding." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 § B.3.</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>REIMBURSEMENTS and SUPPLEMENT REQUESTS</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	Examine all expenditure reimbursements and supplemental requests processed during the 12 month period of review. Review the file documentation for evidence of compliance with CSA statutes, policies, and procedures as listed below. Attach a list of the FAPT referrals selected for review. Document an explanation for any observations of partial or non-compliance.			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b>CSA Manual 4.5.5</b> <u><a href="#">Section 4.5.5 - Supplemental State Allocation Toolkit</a></u> <u><a href="#">Supplemental State Allocation Overview</a></u> <u><a href="#">Supplemental Allocation Requirements</a></u>	4. Requests must comply with the supplemental allocation requirements as documented in the CSA Manual Toolkit.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Fiscal Activities: FISCAL REPORTING &amp; DATA SECURITY</b>				
<b>Note:</b> This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.				
<b>PROCEDURE</b>	<ol style="list-style-type: none"> <li>Determine whether fiscal reporting and data security policies and procedures have been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy, data security, and related guidance are included for reference.</li> <li>Review CSA Data Set reports for verification of compliance with established policies and procedures and accuracy of reported data.</li> <li>Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</li> </ol>			
Reference	Description	Compliance Status		
		Full	Partial	Non
CSA Manual 4.6.1 § 2.2-2648;" <a href="#">COV§ 2.2-2649 B. 12.</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 §B.2.d.</a> <a href="#">2011 Appropriations Act, Chapter 890, Item 274 §B.3.</a>	<ol style="list-style-type: none"> <li>All client-specific information shall remain confidential and only non-identifying aggregate demographic, service, and expenditure information shall be made available to the public;" <a href="#">COV§2.2-2648 D.16</a></li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>Each locality shall submit to the Office of Comprehensive Services information on utilization of residential facilities for treatment of children and length of stay in such facilities." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 §B.2.d.</a></li> </ol>			
	<ol style="list-style-type: none"> <li>"Utilizing a secure electronic site, each locality shall also provide information as required by the Office of Comprehensive 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." <a href="#">2011 Appropriations Act, Chapter 890, Item 274 §B.3.</a></li> </ol>			
<b><u>Section 4.6.1 - CSA Data Set Toolkit</u></b>	<b><u>Guidance on Data Set</u></b> <ol style="list-style-type: none"> <li>Local governments are to file data three times annually, January 31, (for the 6 months ending December 31; April 30 for the preceding quarter and October 15 for the June 30<sup>th</sup> fiscal year end.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<ol style="list-style-type: none"> <li>A user name and password is needed to access this information due to the confidential nature of the child specific data.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b><u>Passwords &amp; Local Government Reporting of Data</u></b> <ol style="list-style-type: none"> <li>Any person the local government has authorized to prepare any CSA report must have a username and password to access all the CSA Reports Destination Screens. The usernames and passwords are created at the local government level.</li> </ol>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Supplemental Worksheets – Fiscal Activities: FISCAL REPORTING &amp; DATA SECURITY</b>				
<b>Note: This document lists only the compliance criteria established at the State level. Local CPMTs are encouraged to include in this process a review of compliance with the locally established policies and procedures for administering local CSA programs.</b>				
<b>PROCEDURE</b>	<p>4. Determine whether fiscal reporting and data security policies and procedures have been established by the CPMT. Review the established policy and procedure to verify existence of the required elements. Links to records management policy, data security, and related guidance are included for reference.</p> <p>5. Review CSA Data Set reports for verification of compliance with established policies and procedures and accuracy of reported data.</p> <p>6. Document an explanation for any observations of partial or non-compliance and include as an attachment to this document.</p>			
Reference	Description	Compliance Status		
		Full	Partial	Non
<b><u>Section 4.6.1 - CSA Data Set Toolkit</u></b>	4. Each CPMT assigns a local representative to be the CSA fiscal agent. This person is responsible for approving all CSA reporting. The local CPMT must notify the state CSA Business Manager of the name of the person assigned as the locality fiscal agent. Only the state CSA Business Manager can approve or change the local fiscal agent user ID, names, and passwords.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b><u>Section 3.1.5 - Duties of the CPMT Toolkit</u></b> <a href="#">October 29, 2010</a> <a href="#">Joint CSA/DOE Memorandum Re: STI Identifier</a>	1. In order to help school divisions accurately report their CSA funded students and reconcile their data with local CSA offices, divisions will be required to provide additional data to OCS. Beginning with the 2010-2011 school year, the school division representative to the CPMT will be responsible for providing a student State Testing Identifier (STI) to the CPMT, which will then be responsible for maintaining a database of these STIs along with the services the student received at the time of authorization for funding of services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. STI numbers should be collected for CSA funded students receiving congregate care education services, either Medicaid or non-Medicaid, and/or any student receiving private day education services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Each individual CPMT should develop a specific procedure for local collection and maintenance of this information. The information is to be maintained by the CPMT and made available to the school divisions as requested.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. The listing should contain the following information: <ul style="list-style-type: none"> <li>• STI number</li> <li>• Student name</li> <li>• Service placement type (SPT 6, 17, or 18)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. The information identified in item 4 should be securely maintained as a confidential student record. Please note, the STI number will not be collected by OCS in the CSA Data Set.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## SECTION V: COMPLIANCE LOCAL CPMT COMPLIANCE ASSESSMENT WORKSHEET

The purpose of the Comprehensive 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 2.2-268 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 Comprehensive Services Act ([§ 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](#);"

Task Description	Describe activity performed to validate/verify assessment criteria (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
<b>PROGRAM ACTIVITIES</b>					
9. Review program activities of the most recent 12 months to assess compliance with local CPMT policies and procedures that govern CSA services.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Document the assessment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Itemize deficiencies and the corresponding plan of action.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Document CPMT discussion of deficiencies and plan of action.					
<b>FISCAL ACTIVITIES</b>					
13. Review fiscal activities of the most recent 12 months to assess compliance with local CPMT policies and procedures governing CSA pool fund expenditures.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Document the assessment.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. Itemize deficiencies and the corresponding plan of action.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. Document CPMT discussion of deficiencies and plan of action.					
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

## **SECTION VI: CORRECTIVE ACTION**

- Corrective Action Plan Worksheet
- Corrective Action Plan Worksheet Supplement

## SECTION VI: CORRECTIVE ACTION CORRECTIVE ACTION PLAN WORKSHEET

Significant weaknesses in internal control and incidences of non-compliance must be documented and a corrective action plan developed. A corrective action plan includes the following elements, at minimum:

- Summary description of the deficiency,
- Description of the corrective action to be taken; actions taken should be measurable.
- Target date for the completion of corrective action; target date should be within the next 12 months following the date of the self-assessment.
- Personnel responsible for implementing corrective action and for monitoring progress.

Source: [http://www.doa.virginia.gov/Financial\\_Reporting/ARMICS/ARMICS\\_Standards.pdf](http://www.doa.virginia.gov/Financial_Reporting/ARMICS/ARMICS_Standards.pdf)

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets, if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			Comments
		Y	N	N/A	
1. Review worksheets completed in Sections I through V. Prepare a summary listing internal control weaknesses and/or non-compliance observations identified.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Prepare a corrective action plan to address the deficiencies identified Task 1. The Corrective Action Plan Worksheet Supplement or a reasonable facsimile may be used.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Notify the Office of Comprehensive Services of control weaknesses and non-compliance deficiencies; accompanied with corrective action plan.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Verify that corrective action is implemented timely (in accordance with the target dates established).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Provide periodic reports to the CPMT and the Office of Comprehensive Services regarding corrective action status.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Authority/Criteria: COV [§ 2.2-5205](#), CSA Policy Manual Section 3, Local Management Structure

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

## SECTION VI: CORRECTIVE ACTION CORRECTIVE ACTION PLAN WORKSHEET SUPPLEMENT

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

<b>CORRECTIVE ACTION PLAN DETAILS</b>					
<b>Condition No.</b>	<b>Corrective Action</b>	<b>Responsible Party</b>	<b>Target Date</b>	<b>Self Reporting Status</b>	
				Click here to enter a date.	
In Progress		Completed			
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter a date.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Please check if attachments are included.					
If corrective action is not complete, please explain: Click here to enter text.					

<b>Corrective Action Plan Approval</b>		
<b>Signature:</b>	<b>Title:</b>	<b>Date:</b> Click here to enter a date.
<b>Print Name:</b>		

## **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 program's compliance and internal controls in order to more effectively manage risk and maintain accountability. The governing CPMT will certify to the Office of Comprehensive Services that:

- (1) They have evaluated their local CSA programs to ensure that they are accomplishing the objectives of the Comprehensive 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, as well as compliance with applicable statutes, laws, policies, procedures, etc.

Task Description	Describe activity performed to validate/verify assessment criteria. (May attach additional sheets , if needed)	Is there evidence to demonstrate achievement of criteria? (May attach additional sheets, if needed)			
		Y	N	N/A	Comments
1. Complete the Statement of Acknowledgement and Certification.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Ensure that the corrective action plan is attached, if applicable.					
3. Forward Certification and accompanying corrective action plan (if any) to the Office of Comprehensive Services by the established due date in accordance with the scheduled audit plan.					
Authority/Criteria: COV <a href="#">§ 2.2-5205</a> , CSA Policy Manual Section 3, Local Management Structure					

<b>Completed By:</b>		<b>Date:</b>	Click here to enter a date.
----------------------	--	--------------	-----------------------------

**SECTION VII: CERTIFICATION  
STATEMENT OF ACKNOWLEDGEMENT AND CERTIFICATION**

<p>The            Community Policy and Management Team (CPMT) is responsible for establishing and maintaining an effective system of internal control to ensure compliance with the Comprehensive Services Act (CSA). The [Agency] has completed its control and compliance self-assessment for the period ending            .</p> <p>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 [Agency] can provide reasonable assurance that:</p>		
<input type="checkbox"/>	<p>A self-assessment has not been completed at this time. The            CPMT is providing assurance that a self-assessment will be completed no later than            . (Note: Must be complete no later than 60 days after the calendar year ending.)</p>	
<input type="checkbox"/>	<p>No significant non-compliance observations and/or weakness were found in the design or operation of the internal controls applicable to the processes or services conducted on behalf of CSA.</p>	
<input type="checkbox"/>	<p>No significant observations of non-compliance and/or weakness were found in the design or operation of the internal controls applicable to the processes or services conducted on behalf of CSA. However, other (non-significant) non-compliance issues and internal control weaknesses were identified. The            CPMT is providing assurance that they <input type="checkbox"/>will/ <input type="checkbox"/>will not address these minor weaknesses by            , 20            .</p>	
<input type="checkbox"/>	<p>Significant non-compliance observations and/or weakness were found in the design or operation of the internal controls applicable to the processes or services conducted on behalf of CSA. A list of these weaknesses and a copy of the Corrective Action Plan is attached to this certification. The            CPMT is providing assurance that they will address these significant weaknesses by            , 20            .</p>	
<b>Signature</b>		<b>Date:</b>
<b>Print Name</b>		
<b>Title</b>	<b>Community Policy &amp; Management Team Chairperson</b>	

**FOR ASSISTANCE USING THIS WORKBOOK, CONTACT  
THE OFFICE OF COMPREHENSIVE SERVICES:**

**CONTACT INFORMATION**

**Office of Comprehensive Services  
1604 Santa Rosa Road  
Wythe Bldg, Suite 137  
Richmond, VA 23228  
(804) 662-9816  
[www.csa.virginia.gov](http://www.csa.virginia.gov)  
Susan C. Clare, Executive Director**

**To reach a CSA Program Auditor, please call:**

**Stephanie S. Bacote, CIGA  
(804) 662-7441  
[Stephanie.Bacote@CSA.Virginia.Gov](mailto:Stephanie.Bacote@CSA.Virginia.Gov)**

**Ty F. Parr, MPA  
(804) 662-7451  
[Ty.Parr@CSA.Virginia.Gov](mailto:Ty.Parr@CSA.Virginia.Gov)**