



Children's Services Act
Clarke County, Virginia

Community Policy and Management Team (CPMT)

August 27, 2024

2:00PM

Clarke County Government Center
101 Chalmers Court Room C, Berryville VA 22611

- I. Call to Order**
- II. Approval of the Agenda**
- III. Old Business**
 1. Approval of July 23, 2024, CPMT Minutes
 2. Agency Updates
 3. Parent Representative to FAPT Recruitment Update
- IV. Public Comment**
- V. New Business**
 1. Private Provider Representative to FAPT
 2. Regarding Virtual Emergency FAPTs
 3. Policy Change: Including FAPT Minutes or Allowing Identifying Information in Consent Agenda
 4. Quality Improvement Plan for Audit Approval
 5. FY25 Case File Review
- VI. Financial Report**
- VII. Utilization Management/Continuous Quality Improvement**
- VIII. Closed Meeting Pursuant the Virginia Freedom of Information Act:**
 - FAPT Case Records

Motion to convene in Executive Session pursuant to 2.2-3711 (A) (4) and (15), and in accordance with the provisions of 2.2-5210 of the Code of Virginia proceedings 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 reviewed by the Community Policy and Management Team.
- IX. Certification after Closed Meeting**

Move that the members of the Clarke County CPMT certify to the best of each member's knowledge that (1) only public business matters lawfully exempted from open meeting requirements, and (2) only such business matters were identified in the motion by



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which the closed meeting was convened were heard, discussed, or considered in the closed meeting.

- X. Approval of Cases**
- XI. Adjournment**

CLOSED SESSION

Consent Agenda: 5 cases for vote

Next Meeting: September 24, 2024

CLARKE COUNTY CPMT MEETING MINUTES**July 23, 2024****Attendees**

Nadia Acosta	CSA Coordinator
Jennifer Parker	DSS Representative
Terri Catlett	BOS Representative
Jerry Stollings	CSU Representative and CPMT Chair
Tavan Mair	Private Provider Representative
Leea Shirley	VDH Representative and CPMT Vice Chair
Denise Acker	CSB Representative

Absent

David Ash	Parent Representative
Frank Moore	CCPS Representative

Virtual

Ms. Leea Shirley called the meeting to order at 2:02PM. Ms. Nadia Acosta stated that she had gotten some more accurate reports since the packet had been published and distributed those new reports. Mr. Jerry Stollings made a motion to approve the agenda, and Ms. Jennifer Parker seconded the motion. All members voted in favor.

Old Business:

1. Ms. Denise Acker made a motion to approve the June 25, 2024 CPMT minutes and Mr. Tavan Mair seconded the motion. Ms. Terri Catlett abstained from the vote, as she had been absent from that meeting. All other members voted in favor.
2. There were no agency updates.
3. Ms. Acosta reported that efforts to recruit a new parent representative to FAPT were continuing. Ms. Acosta reported that an advertisement for the position had been put on the Clarke County CSA website and an advertisement would be put in Clarke County's E-Newsletter. Ms. Acosta and Ms. Parker reported that Ms. Shirley had offered to hang a flyer advertising for the parent representative position in the Clarke County Department of Health and that a similar flyer was already hanging in the lobby of DSS.

New Business:

1. Ms. Acosta reported that it had recently been brought to her attention that Ms. Catlett was unable to serve either as the vice-chair of CPMT or as the chair of CPMT, as it would be

considered a conflict of interest with her position on the Clarke County Board of Supervisors. Ms. Acosta reported that Ms. Parker had offered to take over any vice-chair duties until CPMT had made a final decision. Ms. Parker made a motion to remove the Board of Supervisors representative from the CPMT chair rotation and have the Community Services Board representative (Ms. Acker at this time) simply be moved up a year. Ms. Catlett seconded the motion. All members voted in favor. Ms. Acker will be the CPMT vice-chair for FY25 and will be chair for FY26.

2. Ms. Shirley and Mr. Stollings stated that as the June 25, 2024 minutes had detailed notes on CPMT's discussion after the audit report, those could be sent in as CPMT's official response to the audit report. Ms. Shirley asked that Ms. Acosta send a draft of the official response to the audit report to CPMT for approval before sending the official response to OCS.
3. Ms. Acosta reported that FAPT had made some requests that they felt would better serve the community. Ms. Shirley reported that at a previous meeting with her, Mr. Stollings, Ms. Acosta, and Ms. Parker, the requests had already been partially discussed, but that the official decisions on the requests would be handled that day.
 - a. Ms. Acosta reported that FAPT requested a change in dates for uniformity and to better accommodate working parents' schedules. Ms. Acosta reported FAPT specifically requested the second Tuesday of each month from 9AM-3PM for the date.
 - b. Ms. Acosta reported that FAPT understood the state policy that emergency funding requests must be brought to FAPT within 14 days. Ms. Acosta reported that FAPT was requesting approval for virtual FAPT meetings for these emergency funding requests only. Ms. Shirley reported that allowance of virtual meetings was not up to CPMT, but was based on each county's interpretation of the Code of Virginia. Mr. Stollings stated that it felt like each locality had different policy when it came to virtual meetings and gave the example that emergency requests were brought to FAPT through email in Page County. Ms. Shirley reported that previously the county administrator, Mr. Chris Boies, had come to CPMT and stated that public bodies were not allowed to have virtual meetings according to Clarke County's interpretation of the Code of Virginia. Ms. Parker stated that as OCS had given guidance that FAPT was not considered a public body, that she would reach out to Mr. Boies to see if FAPT could be granted an exception for the virtual meetings only in the case of emergency funding requests. Ms. Shirley stated that Mr. Boies should also be asked to come to the August 2024 CPMT meeting to speak about this with CPMT directly. Ms. Shirley asked Ms. Acosta to pass this information on to FAPT and state that the official decision would be given from Mr. Boies.
 - c. Ms. Acosta reported that FAPT was requesting that the CPMT chair provide a brief explanation of funding authorization denials, for cases in which the service recommendation is in line with both OCS and local policy. Ms. Shirley stated that

- passing on information on funding authorization denials was the CSA Coordinator's responsibility.
- d. Ms. Acosta reported that FAPT was requesting a Department of Health representative to FAPT to better serve the community and potentially assist with problems meeting quorum. Ms. Shirley stated that at this time, there were no Department of Health staff available to be appointed to FAPT. Neither Mr. Stollings nor Ms. Shirley felt that a Department of Health representative was necessary, especially as none of the surrounding localities had a Department of Health representative on FAPT. Ms. Parker suggested some alternatives like reaching out to the Laurel Center and the Virginia Victim Witness program to see if they were interested and available to serve on FAPT. Ms. Acosta stated that some other localities had a Court Appointed Special Advocate (CASA) representative on FAPT, but Ms. Parker stated that CASA was not present in Berryville, unfortunately. All the members agreed that a law enforcement representative to FAPT might make a hostile environment for the families, preventing good service planning. Ms. Parker stated that when previously asked for a law enforcement representative to FAPT several years ago, the Clarke County Sheriff's Office had not had any available staff as well. Ms. Shirley asked Ms. Acosta to look into the other options mentioned by Ms. Parker for a new FAPT representative and to continue recruitment efforts for the parent representative.
 - e. Ms. Acosta reported that FAPT was requesting semi-annual joint meetings to continue to evaluate how the Clarke County CSA program was doing and how to better serve the community. Ms. Shirley stated that CPMT was in agreement with the need for semi-annual meetings, but that it would be best for CPMT to at least begin re-writing policy before scheduling a meeting. Ms. Shirley requested that Ms. Acosta send out a new survey for a CPMT policy work session with more than two or three dates and to limit the time to two-hour blocks to best accommodate schedules. Ms. Parker stated that as the strategic planning meeting in April did not have full FAPT participation, she hoped that the semi-annual meetings would have full FAPT participation. Ms. Parker stated that OCS also required mandatory training, and that the training and the semi-annual meetings could be combined. Ms. Acosta stated that Ms. Shirley had told her that OCS had sent some people in person to do a training for CPMT and FAPT in Shenandoah County, and that requesting an in-person training for Clarke County CPMT and FAPT was on Ms. Acosta's to-do list. Ms. Shirley stated that a set date for the semi-annual meeting/training should be postponed until the policy work session date is set.

Financial Report:

Ms. Acosta presented the financial report for FY24 and the financial report for FY25. Ms. Shirley asked for clarification on the actual expenditures and the projected expenditures for FY24. Ms. Acosta reported that at this time, based on both year-to-date expenditures and

invoices that had not been paid/reported, the expenditures for FY24 are expected to total \$561,214. Ms. Acosta reported that OCS had allocated Clarke County CSA a base amount of \$368,539. Ms. Acosta reported that based on both encumbrances for FY25 to date and the amount of money spent for FY24/the utilization rate of FY24, she expected that there would be a small supplement needed. Ms. Shirley asked for more clarification on the calculations. Ms. Shirley also asked for a more detailed breakdown of an expected supplement based on the different match rates for different services so that CPMT would know exactly what would need to be requested from Clarke County and OCS once a supplement was found to be necessary. There were no other questions from the team.

Utilization Management/Continuous Quality Improvement:

Ms. Acosta presented the Continuous Quality Improvement reports for Clarke County CSA. Ms. Acosta reported that in FY24, there was a count of 24 unique cases that were served. Ms. Acosta stated that the average expenditure per child was on a steady increase, with FY24 having an average expenditure per child of \$20,504. Ms. Acosta reported that Clarke County CSA had a better outcome rate than the average statewide outcome rate based on the CANS: the average statewide outcome rate had 44.6% of cases showing improvement, 20.8% of cases showing no change, and 34.6% of cases showing decline. Clarke County CSA shows that 68% of cases show improvement, 20.8% of cases show no change, and only 24% of cases show decline. There were no questions from the team.

Closed Session:

See attachment A for completed form detailing the motion to enter closed session, vote on the items discussed, and certify the discussion in closed session.

Consent Agenda:

The consent agenda with 9 cases, 1 emergency funding request, and 1 appeal was reviewed. Ms. Acker made a motion to approve the cases as discussed in closed session and deny the following requests: case #382 for play therapy and case #384 for a parental capacity evaluation and a mental health/substance use evaluation. Ms. Parker seconded the motion. All members voted in favor.

Ms. Parker made a motion to adjourn the meeting, and Ms. Acker seconded the motion. All members voted in favor. Meeting adjourned at 4:28PM.

Next Meeting: August 27, 2024

Private Provider Representative to FAPT

Clarke County FAPT's private provider representative has been sent out of state for work due to the foreseeable future. Because of this, the private provider representative has missed all the FAPT dates in June, July, and August. The private provider representative informed the CSA Coordinator that at this time, she expected to be out in Minnesota until October 2024, which means that she will miss at least two more FAPT dates. This is over a quarter of the total FAPT dates for FY25. The private provider representative has not resigned at this time but will follow CPMT's decision.

Ms. Jennifer Parker has stated that she is aware of a private provider who would be appropriate to appoint to FAPT in the current representative's place. Ms. Parker has reached out to this provider to see if she would potentially be interested in filling this role.

Regarding Virtual Emergency FAPT Meetings

At the July 2024 CPMT meeting, a request by FAPT to allow for virtual emergency funding authorization meetings was presented. At this time, Clarke County administrative interpretation of the Code of Virginia does not allow for virtual meetings of public bodies. However, according to the Office of Children's Services, the FAPT is not considered a public body, but the final decision of whether virtual emergency funding authorization FAPT meetings are allowed lies with the Clarke County administrator.

Should the Clarke County administrator be amenable to this change, an OCS document addressing considerations for virtual FAPT meetings has been attached below. Additionally, a copy of Clarke County CSA Policy and Procedures manual with proposed language to allow for the virtual emergency funding authorization FAPT meetings has been attached below, with the highlighted section being the proposed change.

CLARKE COUNTY CHILDREN'S SERVICES ACT
POLICIES AND PROCEDURES

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.

Pool funds are not an option for services provided in the public schools for the special education mandate. This policy does not preclude use of wrap around services to children who are in private day placements or those that are transitioning home from a residential setting. If the student has needs that arise from his/her disability that present challenges outside of the school setting, use of mandated funds is appropriate to assist the student and family as long as they are provided in the home and in the community and the purpose is to keep the child in or to return the child to a less restrictive setting. It also does not preclude using pool funds for services held on school grounds outside of the school day such as after-school programs.

VIII. In certain circumstances, CSA funds may be directly accessed to pay for services without prior assessment by the Family Assessment and Planning Team.

A. These circumstances include:

1. Children in educational residential or private day placement required by a current IEP provided the youth are assessed at the next scheduled FAPT meeting.
2. Children in need of emergency foster care placement provided youth are subsequently assessed at the next scheduled FAPT meeting.
3. Children in foster care with maintenance payments only.
4. Children who need emergency services to prevent an out of home or out of community placement can be approved until the next FAPT meeting using the Emergency Funding Request Form. The case would then be required to be heard by the FAPT within 14 days of the emergency funding authorization and subsequently heard by CPMT.
 - a. The FAPT may utilize a virtual meeting to ensure availability of a quorum for emergency funding request hearings only.
 - b. In these virtual emergency funding FAPT meetings, all FAPT members must have their cameras on and be actively engaged in the meeting. Failure to do so will result in that FAPT member being marked as absent from the meeting.
 - c. Confidentiality must be explained to all participating guests and signature sheets filled out via electronic means.
 - d. These virtual emergency funding FAPT meetings may not be recorded by any means to protect confidentiality.
5. CSA state pool funds can be used to pay for "emergency" services for a period up to 14 days prior to the meeting of the FAPT and FAPT's subsequent approval of that service.

B. Agencies directly accessing funds from the state pool will report such expenditures monthly to the Community Policy and Management Team.

IX. In order to access services through CSA funds, children and families shall undergo a referral process.

- A. Referrals may originate from public agencies serving on the CPMT and FAPT and from parents.
- B. Cases that are transferred from other localities must be transferred not only through the CSA Coordinator but directly to all appropriate local agencies (i.e. school, DSS). The transfer case will not be accepted and put on the FAPT schedule without a case manager from the appropriate agency.
- C. The Clarke County FAPT shall accept referrals from families. The CSA Coordinator will determine and document if the child is eligible for funding from the CSA Pool Funds. If eligible, the Coordinator will assign the child a time on the next regularly scheduled FAPT agenda. The

Virtual Family Assessment and Planning Team (FAPT) Meetings¹

What does virtual FAPT mean?

A FAPT meeting is considered virtual when any of the participants are utilizing a web-based platform/application (e.g., Zoom) and/or phone to facilitate or engage in the meeting.

Fully virtual FAPT meetings occur when FAPT members, the family, provider, and any other participants all participate by video or phone.

Hybrid virtual FAPT means any combination of the following:

- The FAPT members may all be meeting in person in the same room and any combination of the caseworker, family, providers, etc. participate via electronic means.
- Any combination of FAPT members, family, or providers participating in an in-person meeting with some members participating virtually.

Benefits to a virtual FAPT:

- Improved participation, attendance, and engagement from families and vendors.
- Elimination of the need for travel by team members, and providers.
- No transportation barrier for families.
- More flexible scheduling options so that FAPT can occur, avoiding and decreasing interruptions in service approval/provision.

Potential barriers to a virtual FAPT:

- Internet/Technology issues.
- Lack of FAPT member engagement.
- Concerns about obtaining signatures.
- Inability to provide an adequate level of confidentiality due to available platform capabilities.
- The virtual platform may not be the best way to engage all families.

¹ This document was developed for the CSA State and Local Advisory Team by a group of SLAT members and local CSA Coordinators. The document was approved by the SLAT on August 4, 2022.

Best Practices/Guidance for Virtual FAPT Meetings

If a locality is going to utilize a virtual FAPT option, it is recommended that local policy include language regarding the authorization and circumstances of virtual FAPT meetings. Policy language may include content related to some of the best practices identified for virtual FAPT meetings.

Security:

Learn about the security features of the virtual platform and implement the applicable security features to whichever platform you use. Potential options to mitigate security concerns include, but may not be limited to:

- Work with your locality's IT Department to identify the available platforms and security features.
- Locked meetings.
- Obtain a list of expected participants in advance and admit only authorized individuals.
- Use separate meeting links for each FAPT case.
- Utilize a meeting password/passcode.
- Designate a host to admit individuals.
- Ensure staff and families know that using an open (non-secured) Wi-Fi internet access limits the amount of meeting security.
- Make sure your local policy addresses that virtual meetings should not be recorded.

Confidentiality:

Being in a virtual setting for FAPT members is different than being in the controlled environment of the FAPT conference room, so confidentiality looks different. Localities may want to consider updating FAPT member confidentiality forms to include confidentiality for FAPT members working off-site. Some possible options include:

- Annual confidentiality agreement that includes a statement that references protocols when a member is participating in a meeting virtually, such as ensuring that confidential information is protected and not visible or will be able to be overheard by individuals who are not supposed to have access to that information.
- Include statements of confidentiality on the IFSP signature page that acknowledges each participant's pledge to keep information confidential. For example: "By signing this IFSP, I agree not to divulge any information revealed at this meeting to any individual or agency, except as authorized by policy or required by law."

Signatures:

It is recommended that localities meeting virtually have a signature solution, ideally an electronic signature program recommended by your locality's IT Department. Potential options include, but may not be limited to:

- DocuSign
- Adobe Sign
- Faxing/Scanning

If signatures are unable to be obtained through an electronic method, verbal consent should be documented in the Individual Family Service Plan (IFSP) with a notation of who provided the consent, on what date, and who recorded it on the document.

Family Engagement:

- Have a call-in option for people unable or do not have the capacity to participate via a web- based platform.
- If allowable by your locality, consider purchasing calling cards for families who may struggle with keeping cell service.
- Have a language interpreter to engage in the virtual meeting if needed.
- Ensure that enough time is scheduled for the meeting such that the family's voice can be heard in the time allowed.
- Provide as much flexibility in scheduling to ensure that the time scheduled works for the family.

FAPT Member Engagement/Professionalism:

FAPT members should participate in meetings in the same way that they would participate in person, in terms of levels of engagement and professionalism. It is recommended that localities each identify their own requirements and develop their culture of engagement. Some suggestions include:

- Members should use their camera if they have access to one.
- Members should demonstrate engagement by looking at the screen (and/or explaining that they are looking at a second screen for typing).
- Members should provide feedback and participate in the conversation.
- Members should avoid eating, driving, napping, answering the phone, engaging in "outside" conversations, etc. during FAPT meetings.
- Consider designating a specific "technology facilitator" and/or a separate

documenter, so the meeting facilitator is able to fully engage with the family and participants.

- Facilitators may consider an opening statement to families and providers to explain some of the things mentioned above. For example, "please note that our staff will be engaged during your FAPT meeting today, but there may be times when staff will be writing notes or researching policies and services related to your case and therefore they may seem distracted."
- Consider formats where at least some FAPT members are in person in the same room to facilitate communication among members.
- Consider having rules of engagement displayed on the screen if using a virtual platform.
- Localities should have a procedure regarding cancelation of virtual FAPT meetings in the event that a meeting is canceled.

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The Clarke County Community Policy and Management Team (also known as CPMT) believes the family and home community provide the best environments for raising children. The CPMT shall pursue and encourage collaborative activities that will ensure the provision of child-centered, family-focused community based services. Our purpose is to preserve families and provide appropriate services while protecting the welfare of children and maintaining the safety of the public.

- I. The CMPT shall anticipate the number of children for whom such mandated services will be required and shall reserve from its state pool allocation such a sum as shall be sufficient to meet these needs. The Pool Funds can be used to provide services to children/youth and their families in the populations described below. Clarke County provides services for the non-mandated population, based on the funds provided by the State of Virginia and the Clarke County Board of Supervisors.

A. Eligible Population

In order to be eligible for funding for services through the state pool of funds, a youth or family with a child shall meet one or more of the criteria specified in subdivisions 1 through 5. Eligibility shall be determined through the use of a uniform assessment instrument and by policies of the CPMT.

For purposes of determining eligibility for the state pool of funds, "child" or "youth" means (i) a person less than eighteen years of age and (ii) any individual through twenty-one years of age who is otherwise eligible for mandated services of the participating state agencies including special education and foster care services." [COV § 2.2-5212 B.](#)

1. The child or youth has emotional or behavior problems that:
 - a. have persisted over a significant period of time or, though only in evidence for a short period of time, are of such a critical nature that intervention is warranted
 - b. are significantly disabling and are present in several community settings such as at home, in school or with peers; and
 - c. require services or resources that are unavailable or inaccessible or that are beyond normal agency services or routine collaborative processes across agencies or require coordinated interventions by at least two agencies
2. The child or youth has emotional and/or behavior problems, and currently is in, or is at imminent risk of entering purchased residential care. In addition, the child or youth requires services or resources that are beyond normal agency services or routine collaborative processes across agencies, and requires coordinated services by at least two agencies.
3. The child or youth requires placement for purposes of special education in approved private school educational programs.
4. The child or youth has been placed in foster care through a parental agreement between a local social services agency or public agency designated by the CPMT and his parents or guardians, entrusted to a local social services agency by his parents or guardian or has been committed to the agency by a court of competent jurisdiction for the purposes of placement as authorized by [§ 63.2-900](#). [COV § 2.2-5212 A.](#) This includes the CHINS Interagency Guidelines.
5. The child receives special education services within the public school and meets criteria for CSA wraparound services. The special education mandate may be utilized to fund non-residential services in the home or 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.

B. Mandated Populations:

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1. Children placed for purposes of special education in approved private school education programs, previously funded by the Department of Education through private tuition assistance;" (Note: This includes only private day and private residential placements for the purpose of receiving a free and appropriate public education).
 2. Children with disabilities placed by local social services agencies or the Department of Juvenile Justice in private residential facilities or across jurisdictional lines in private, special education day schools, if the individualized education program indicates such school is the appropriate placement while living in foster homes or child-caring facilities, previously funded by the Department of Education through the Interagency Assistance Fund for Non-educational Placements of Handicapped Children;
 3. Children for whom foster care services, as defined by (Code of Virginia) §63.2-905, are being provided to prevent foster care placements, and children entrusted to local social service agencies by their parents or guardians or committed to the agencies by any court of competent jurisdiction, or placed with a local department or public agency designated by the Community Policy Management through an agreement where custody is retained by the parent or prior custodian for purposes of placement in suitable family homes, child-caring institutions, residential facilities or independent living arrangements, as authorized by (Code of Virginia) § 63.2-900;
 4. The child or youth has been placed in foster care through a parental agreement between a local social services agency or public agency designated by the community policy and management team and his parents or guardians, entrusted to a local social services agency by his parents or guardian or has been committed to the agency by a court of competent jurisdiction for the purposes of placement as authorized by [§ 63.2-900](#). [COV § 2.2-5212](#). This includes the CHINS Interagency Guidelines.
 5. Children who receive special education services may utilize mandated funds for non-educational services identified in a FAPT Service Plan when the FAPT identifies that the services will prevent a more restrictive special education placement and the services are not in the IEP. The FAPT must document that the services are necessary to keep the child out of a more restrictive private special education placement. The FAPT should consider non-educational issues that may be impacting the student's performance in school and that interfere with the school's ability to meet the child's educational needs. The State of Virginia has capped the expenditures for Special Education Wrap-around services, and the locality shall not exceed its allocation.
- C. Targeted Populations: The targeted population is served through CSA Non-Mandated funds.
1. Children placed by a juvenile and domestic relations district court, in accordance with the provisions of [§16.1-286](#), 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 COV [§ 16.1-284](#).
 2. 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 COV [§ 16.1-14](#).
 3. Children, as defined under Eligible Population, who have been assessed by the Family Assessment and Planning Team and are need of community-based services. These services are not necessary to prevent an out of home placement.
- II. The Family Assessment and Planning Team (also known as FAPT) , in accordance with [§ 2.2-2648](#), shall assess the strengths and needs of troubled youths and families who are approved for referral to the team and shall identify and determine the complement of services required to meet these unique needs, [COV § 2.2-5208](#); with the exception of foster care maintenance, which includes the room and board, day care and transportation costs for foster care youth.
- III. The CSA pool is responsible to fund the following special education services:

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- A. All services delineated in an IEP which specifies placement into a private day special education facility or a private residential facility.
 - B. 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)
 - C. 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
- IV. Local school divisions are responsible for payment of the following:
- A. All services specified in the IEP for students with disabilities who are served in the public schools
 - B. Evaluations to determine eligibility for special education and as required for re-evaluation of students with disabilities
 - C. Homebound instruction
 - D. Public school personnel necessary to implement the Standards of Quality and staffing requirements specified in the Regulations Governing Special Education Programs for Children with Disabilities in Virginia (including teachers and paraprofessionals), and staff necessary to provide services specified in a child's IEP when the child is served in the public schools
 - E. Regional special education programs costs
 - F. Tuition payments to another school division
 - G. Transportation costs necessary to implement IEP placements in private programs (i.e., private day and private residential placements)

V. Parental Co-Payments and CSA

As federal law requires that all special education services must be provided at no cost to parents. And no co-payment may be charged to a parent for any service specified on the IEP or otherwise provided as a requirement of a free appropriate public education. 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.

VI. Medicaid-Funded Residential Placements of Students with Disabilities

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. In cases where there is Medicaid and the CSA policy of least restrictive has been met, the CPMT approval is contingent upon IACC approval.

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 free appropriate public education (FAPE). If the school division determines that a public school service (e.g., enrollment in the LEA where the residential program is located, homebound, etc.) is appropriate to meet the needs of the student, the school division is responsible for ensuring the delivery and funding of those services. 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.

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 nor the CSA team have any obligation to pay for educational services.

VII. Wraparound Services for Students with Disabilities Funds

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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.

Pool funds are not an option for services provided in the public schools for the special education mandate. This policy does not preclude use of wrap around services to children who are in private day placements or those that are transitioning home from a residential setting. If the student has needs that arise from his/her disability that present challenges outside of the school setting, use of mandated funds is appropriate to assist the student and family as long as they are provided in the home and in the community and the purpose is to keep the child in or to return the child to a less restrictive setting. It also does not preclude using pool funds for services held on school grounds outside of the school day such as after-school programs.

VIII. In certain circumstances, CSA funds may be directly accessed to pay for services without prior assessment by the Family Assessment and Planning Team.

A. These circumstances include:

1. Children in educational residential or private day placement required by a current IEP provided the youth are assessed at the next scheduled FAPT meeting.
2. Children in need of emergency foster care placement provided youth are subsequently assessed at the next scheduled FAPT meeting.
3. Children in foster care with maintenance payments only.
4. Children who need emergency services to prevent an out of home or out of community placement can be approved until the next FAPT meeting for up to \$2500 in community-based services. The expenditures have to be approved using the Emergency Funding Request Form. The case would still come to FAPT and CPMT.
5. CSA state pool funds can be used to pay for "emergency" services for a period up to 14 days prior to the meeting of the FAPT and FAPT's subsequent approval of that service.

B. Agencies directly accessing funds from the state pool will report such expenditures monthly to the Community Policy and Management Team.

IX. In order to access services through CSA funds, children and families shall undergo a referral process.

A. Referrals may originate from public agencies serving on the CPMT and FAPT and from parents.

B. Cases that are transferred from other localities must be transferred not only through the CSA Coordinator but directly to all appropriate local agencies (i.e. school, DSS). The transfer case will not be accepted and put on the FAPT schedule without a case manager from the appropriate agency.

C. The Clarke County FAPT shall accept referrals from families. The CSA Coordinator will determine and document if the child is eligible for funding from the CSA Pool Funds. If eligible, the Coordinator will assign the child a time on the next regularly scheduled FAPT agenda. The members of the FAPT will assign the child and family a case manager.

D. All referrals shall be directed for coordination to the CSA Coordinator/FAPT Chairperson. A family/youth must have a case manager to come through the FAPT process (5/20/19).

E. The standardized referral packet will be used for all cases presented to the Family Assessment and Planning Team. The referral information shall be brought to the FAPT meeting and shall include:

1. The referring agency
2. Identifying data on the child and family
3. The presenting problem

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4. Previous interventions
 5. Background information
 6. Strengths, interests and needs of the child and family
 7. A service plan
 8. A Child and Adolescent Needs and Strengths (CANS) is mandatory for accessing CSA funds. The initial CANS assessment is required when a case comes to FAPT and every year after that for as long as the service is in place. A discharge CANS is also required.
 9. Consent to Exchange Information
 10. A budget form
 11. Recovery of Funds form (as needed)
 12. A Division of Child Support Enforcement application (as needed for Non- Custodial Foster Care and Parental Agreements)
- F. A record of all referrals and disposition of them shall be kept in the office of the CSA Coordinator.
- G. Children and families shall be scheduled on the FAPT agenda, as soon as possible, not to exceed 30 calendar days from receipt of a completed referral packet.
- H. Complete FAPT paperwork must be submitted to the FAPT chairperson, by the Wednesday of the week before the FAPT meeting, or the case will not be put on the agenda.
- I. Effective January 1, 2024, all FAPT members (to include alternates approved by CPMT as needed if the primary representative is not available) are required to attend all FAPT meetings in person. If an exception is warranted, the FAPT's member's department head/CPMT representative is required to give approval for virtual attendance. Virtual attendance is defined here as having both audio and video participation, if video is possible.
- X. The FAPT shall provide for family participation in all aspects of assessment, planning and implementation of services [§2.2-2648](#)
- A. Families are to be fully involved in planning for their children whenever possible. Parents and/or legal guardians should attend FAPT meetings, especially the first meeting, unless there are extenuating circumstances prohibiting their attendance. On April 15, 2019, CPMT voted to make parent or legal guardian attendance at the initial FAPT meeting a requirement. The case may not be brought to FAPT without the parent participation either in person or via phone.
 - B. The referring agency staff person will provide for family participation, such as:
 1. scheduling meetings at times family members are available,
 2. providing for child care and transportation, as needed,
 3. assisting the family in identifying their strengths and asking what they believe their needs are,
 4. considering the input of family members,
 5. encouraging family members to include persons who have an important and/or helpful role and relationship to them, such as caregivers, providers, neighbors, professionals, extended family and non-relative supports
 - C. Parents/legal guardian shall be provided sufficient notice by the case manager of FAPT meetings during which their child will be assessed/discussed. The case manager will:
 1. explain the meeting's purpose, process and goal,
 2. encourage parents and youth to identify whom they wish to include as support persons,
 3. explain the responsibilities of the FAPT to the parents,

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4. explain the responsibilities parents and children have to the CSA system and to service providers,
 5. ensure understanding of the parameters of confidentiality during the FAPT meeting
- D. Parents/legal guardian shall be informed in writing by their case manager of their rights and responsibilities as part of the assessment planning process. Also, parents/legal guardians will be notified in writing of the appeal process for FAPT decisions. It is also important that families understand that each child serving agency has its own appeal process. Use of the CSA process in no way negates the use of the separate appeal process of another agency.
- E. Parents/legal guardian and child shall be notified of the results of the FAPT process. Within **14** business days, the CSA Coordinator will send a letter, with a copy to the private provider, specifying the services approved (or not approved), the start date of services and the cost of services.
- F. Information shall be provided in the parents'/legal guardians' native language or mode of communication.
- G. As much as possible, the parents/legal guardian needs shall be accommodated regarding the meeting time/place of the FAPT.
- H. In the case of inclement weather, the FAPT meeting scheduling shall follow the schedule of Clarke County Public Schools: if CCPS closes due to inclement weather, any FAPT meetings scheduled for that date are automatically cancelled. It is the responsibility of the CSA Coordinator to reach out to the FAPT members as soon as possible to inform them that FAPT will not be happening, and recommended for the CSA Coordinator to notify the case managers. The case managers are responsible for notifying the families.
- I. Families shall contribute financially to the support of children as follows:
1. Educational services required for children through an IEP are exempt from parental contribution. However, services for Special Education Wrap-around services not specified in a student's Individualized Educational Plan (IEP) will be subject to a parental contribution. The need for services must be documented in an IFSP or FAPT Assessment and Service Plan with specific goals and objectives for the provider delineated.
 2. Prior to entry into a residential facility through a Non-Custodial Foster Care or Parental Agreement, all forms from the Division of Child Support Enforcement shall be completed, if applicable.
 3. Families who receive community-based services to prevent an out of home placement or services paid with non-mandated funds will be assessed for their ability to contribute. The need for services must be documented in an IFSP or FAPT Assessment and Service Plan with specific goals and objectives for the provider delineated.
 4. Families will not have a parental co-payment for the first month of the delivery of CSA funded services. The case manager and parents must complete the Parental Co-Payment Initial Screening Form. If the family does not qualify for an exemption, the parental responsibility for community-based services shall be 3% of the family's monthly gross income, not to exceed the cost of services. **All congregate care placements must follow the Division of Child Support Enforcement process.** Parents are responsible for making payments directly to the private provider. If needed, parents may request a reduction in their co-payment. All reductions must be approved by the CPMT.
 5. Youth receiving a Fostering Futures Stipend will not be required to pay a co-payment for community based services. (Approved 8/20/2018)
 6. There is to be no co-payment required for drug testing (CPMT approved 10/21/19)
 7. Families with more than one child receiving community based services, will be assessed for a co-payment per child. (Approved 11/19/2018)

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- XI. An Individual Family Service Plan, providing appropriate and cost effective services, shall be developed for youths and families assessed by the FAPT. [§2.2-2648](#)
- A. The family and FAPT shall act as partners throughout the assessment process. The FAPT should rely heavily on the strengths of the child and family, as well as, on the expertise of the service providers in the assessment process, in the development of goals and in the selection of appropriate services.
 - B. In the event that a child is eligible for special education services and is also being staffed by a FAPT, every effort should be made to integrate the process of developing both the IEP and the IFSP.
 - C. Preparation for Assessment
 - 1. The CSA Coordinator or FAPT chairperson shall schedule the dates for assessment and keep a master list of the schedule of FAPT meetings.
 - 2. The referring agency shall be responsible for case management services.
 - 3. The case manager shall notify the family, prepare them to attend the assessment meeting, and confirm the family's availability for the scheduled FAPT assessment.
 - 4. The case manager shall get release of information forms signed, and no information shall be presented for which a release cannot be obtained.
 - D. Assessment procedure
 - 1. The agenda will be shared with the FAPT members prior to the meeting.
 - 3. The case manager shall present to FAPT information on persons to be assessed. If the case manager is not available, another agency representative or the CSA Coordinator may present the relevant information.
 - 3. Parents/legal guardians must participate in the assessment meeting.
 - E. The Individual Family Service Plan should identify and document:
 - 1. Short-term and long-term goals
 - 2. Treatment modalities
 - 3. Designation of individuals or treatment providers responsible for providing FAPT approved services
 - 4. Timelines for accomplishing the goals.
 - 5. Projected cost of services
- XIII. Children and families shall be referred to community agencies and resources in accordance with the Individual Family Services plans. [§2.2-5211](#)
- A. The case manager will oversee implementation of the IFSP and provide a written report to the FAPT.
 - B. The CSA Coordinator will attend CPMT meetings to present the IFSP and budget for approval.
- XIII. The Family Assessment and Planning Teams shall make recommendations to the Community Policy and Management Team regarding expenditures from CSA funds. [§2.2-5211](#)
- A. All recommendations for funding must be authorized by the CPMT. All expenditures must be reported to the CPMT on a monthly basis.
 - B. Any recommendation for an IFSP purchased service over \$3500 per month must be approved by the CPMT. **(According to auditor, all expenditures must be authorized by CPMT prior to implementing the service.)**
 - C. Emergency approval for residential placements or services in excess of \$3500 per month must

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be obtained from the CPMT Chairperson.

- D. FAPT minutes shall be provided to the CPMT to assist the CPMT in making informed decisions regarding expenditures from CSA funds. These minutes shall include the FAPT's recommendations, FAPT's reasoning for the recommendations, and a brief update on how the family is doing, but shall not include personally identifiable information.

XIV. Referring agencies shall obtain consent to exchange client information. [§2.2-5210](#).

- A. The "Uniform Consent to Exchange Information" developed by the Commonwealth's Attorney General shall be used.
- B. All public agencies that have served a family or treated a child who is referred to the Family Assessment and Planning Team shall provide information on the family.
- C. Every participating agency shall promptly release authorized information upon request of the Family Assessment and Planning Team.
- D. Family Assessment and Planning Team meetings are not open to the public and all information about specific children and families obtained by team members shall be confidential.
- E. Demographic, service and cost information on youths and families receiving services and funding through the Children's Services Act, which is of a non-identifying nature may be gathered for reporting and evaluation.

XV. Children and families assessed by the Family Assessment and Planning Team and accessing CSA funds shall be reviewed periodically.

- A. Children in congregate care facilities (except children placed through their IEP) shall be reviewed every three months. Quarterly reports written by the facility staff shall be reviewed and progress toward transition home shall be assessed.
- B. Children in therapeutic foster care homes shall be reviewed every six months. Reports written by the child-placing agency staff shall be reviewed, and progress toward transition home shall be assessed.
- C. Children in therapeutic foster care with a permanent plan shall be reviewed at least annually. If the child is moved from the placement they will return to FAPT within a month of the date of the move.
- D. Children/families receiving prevention services shall be reviewed every three months. A written report by the case manager shall be reviewed and continuation services shall be assessed.
- E. Children in regular foster care homes receiving CSA-funded services, in addition to maintenance, shall be reviewed at least every six months; children in foster care receiving only maintenance shall be reviewed every year (Approved by CPMT 2/25/19). Foster care maintenance and the following services may be approved: day care, counseling, evaluations, medical treatment and all other foster care services, not to exceed \$2500 per month. A statement in the FAPT minutes will reflect the team's decision. **(Auditor states we cannot approve blanket services.)**
- F. Children in placement based on an Individualized Educational Plan (IEP) shall be reviewed at least every six months.
- G. Children who are being stepped down to a less restrictive environment or moved to a new placement shall be reviewed prior to that move. Children who are moved on an emergency basis will be staffed at the next available FAPT meeting.
- H. Mentoring services should be used on a short-term basis with a primary goal of connecting to a sustainable community resource. The number of hours will incrementally decrease over the treatment period. (CPMT approved 1/27/20).

XVI. Children may be placed in foster care and mandated through a non-custodial foster care agreement where the parents or custodians retain custody and the child receives case management

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services from the LDSS. The child is in foster care and subject to exactly the same federal and state legal requirements, policies and protocols as any other child in foster care. A CHINS petition with the service plan should be filed by the LDSS in the juvenile and domestic relations district court within 60 days of placement of the child in order to comply with legal requirements for children in foster care. The child and his or her family are eligible for all foster care services and all other foster care requirements apply. Parent(s) or guardians may enter into an agreement with the LDSS to voluntarily place a child under age 18 outside of the home in 24 hour substitute care while the parent(s) or guardians retain legal custody. Prior to entering a non-custodial foster care agreement, services to prevent the need for foster care placement must be offered and must be documented in the service plan. In emergency situations where services cannot be offered, the reasons must be recorded on the service plan.

- A. Before choosing this placement alternative and entering into a non-custodial agreement, the agency must assess and determine:
1. Leaving custody with the parents or guardians is in the best interest of the child and will not place the child at risk; and
 2. The parents or guardians will remain actively involved with the child during placement.
 3. These determinations must be documented on the Non-custodial Foster Care Agreement. If these conditions do not exist, transferring custody to the local department of social services should be considered.
 4. The process to determine parental contribution towards the cost of placement must be started prior to placement. The parents' financial obligation begins on the date of placement.
 5. A Child and Adolescent Needs and Strength (CANS) assessment must be completed prior to placement.
 6. The non-custodial agreement may be signed for a period of six (6) months or less. If treatment is still needed after six (6) months, new agreements must be signed for a period of no longer than six months.
 7. The Local Department of Social Services (LDSS) must file a foster care plan with the Juvenile and Domestic Relations Court within 60 days following the board or public agency's placement of the child unless the court, for good cause, allows an extension of time, which shall not exceed an additional 60 days. LDSS should file a CHINS petition to place the case on the court's calendar and submit the foster care plan.
 8. The court must hold a hearing within 75 days of the child's initial foster care placement to review and approve the plan. The court order must include statements that
 - i. reasonable efforts have been made to prevent the placement and that
 - ii. continuation in the home is contrary to the child's welfare, or it is in the child's best interest to be placed in foster care, or that there is no less drastic alternative than removal of the child from his or her home. All foster care requirements must be met. Time frames for administrative panel reviews and hearings are based on the date of the initial non-custodial foster care placement. The foster care review hearing must occur within six months of the 75-day hearing, if the child remains in non-custodial foster care placement longer than six months.
 9. The case shall be entered into the Child Welfare Information System as a foster care case. The case shall be referred for Medicaid, Title IV-E screening and child support. Child support is to be addressed in the non-custodial foster care agreement. Parents are responsible for paying support from the beginning of placement (§ 63.2-909). A claim for good clause may be made when appropriate. Child support is to be based

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upon DCSE guidelines. Since the child's parent(s) retain custody, they are responsible for signing the required referral and application forms. Maintenance and service costs for non-Title IV-E children will be paid from State Pool Funds.

10. If the LDSS agrees to the return of the child and all required conditions for the child's safe return are met, the child may be sent home on a home visit pending final court approval.
 - B. CSA Parental Agreements are agreements between a public agency, other than LDSS, designated by the CPMT, and a parent or guardian who retains legal custody of the child. **The FAPT may determine that a youth is a Child in Need of Services (CHINS) by completing the Eligibility Determination Checklist for Specific Foster Care Services for Children in Need of Services. (Recommended by the auditor)**The CSA Parental Agreements are only used when the FAPT determines that a child requires placement outside the home to address the child's needs. The public agency designated by the CPMT assumes case management responsibilities. The LDSS cannot be the case manager of a Parental Agreement. If LDSS is case manager, the child **shall be in foster care (Remove)** and a Non-Custodial Foster Care Agreement shall be used.
 1. When a child is placed outside of the home through an agreement between a public agency, other than LDSS, as designated by the CPMT, and the parent(s) or custodians retain legal custody of the child, and this other public agency provides case management services, this child is not considered in foster care and is not subject to the requirements, policies and protocols (i.e., court hearings, Title IV-E eligibility determinations, etc.) required for children in foster care.
 2. While these children are not in foster care, they are eligible for foster care services since they have been placed under an agreement between the local public agency designated by the CPMT and the parents or custodians who retain legal custody.
 3. These CSA Parental Agreements, where a public agency other than the LDSS provides case management services, are subject to Final Interagency Guidelines established by the State Executive Council (SEC of CSA). **LDSS never use these agreements. (Remove)**
 - C. Non-custodial Foster Care and Parental Agreements must go through the FAPT/CPMT process. An emergency FAPT meeting or Family Team Meeting may occur in order to meet the immediate needs of a child or family. If the FAPT recommends that a child needs placement through a Non-Custodial Foster Care or Parental Agreement, the CPMT must approve the funding for this placement through a face to face meeting. The Family Team may approve emergency funds for community-based services if the family is currently receiving CSA funds.
 - D. Residential placements are contingent upon the CSA Policy of implementing least restrictive services before considering residential. If a residential placement is required, Clarke CSA approval is contingent upon IACC approval. (Added by CPMT on 5/20/19).
- XVII. The Community Policy and Management Team shall provide quality assurance and accountability for program utilization and funds management. [§2.1-75206](#)
- A. Individual agencies in the CPMT will continue to meet their reporting requirements for different populations included in Comprehensive Services Act.
 - B. A record of all referrals and dispositions shall be kept in the office of the CSA Coordinator.
 - C. Guidelines for data tracking, evaluation, and utilization management will be followed.
 - D. Progress reports will be submitted by the provider on a monthly basis. Payments will not be made to the vendor unless the progress report has been submitted. (CPMT approved 2/26/2018).
- XVIII. The Community Policy and Management Team shall manage funds in the CSA budget allocated to

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the community from the state pool of funds and any other source [§2.1-75208](#)

- A. The Clarke County Finance Director will serve as the fiscal agent for the Community Policy and Management Team and will provide matching funds at its designated rate.
 - B. The CSA Coordinator shall report expenditures on a monthly basis.
 - C. The fiscal agent shall submit requests for payment to the State Fiscal Agent.
 - D. The Clarke County CPMT is responsible for payment for the IFSP services for children whose legal custodian is within the jurisdiction of Clarke County. In the event that the child's/family legal residence changes, the following policy shall govern payment for services:
 - 1. The case manager is responsible for immediately notifying the CSA Coordinator when the child/family moves out of the jurisdiction of the CPMT. Notification should occur prior to the move, if at all possible.
 - 2. The CSA Coordinator is responsible for:
 - a. Providing written notification to the new Community Policy and Management Team jurisdiction of changes in the child/family's residence, 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's/family's residence.
 - 3. The old 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.
 - 4. When the residence of the child/family transfers to a new CPMT jurisdiction, the receiving CPMT must review the current IFSP and adopt or revise and implement within 30 calendar days.
 - 5. If the locality to which a child/family moves is out of state, then the public agency overseeing service delivery shall notify its comparable agency in the new locality.
 - 6. If a child and family becomes homeless while receiving CSA services, the CPMT shall consider continuation of payment on a case by case basis.
- XIX. The Community Policy and Management Team shall authorize and monitor the expenditure of funds by each Family Assessment and Planning Team [§2.1-75209](#)
- A. Recommendations and requests for funding from Family Assessment and Planning Teams shall be sent to the Community Policy and Management Team members.
 - B. A standardized format shall be used to give a summary justifying requests for funds and reports of expenditures.
 - C. The CSA Coordinator will present the cases to the CPMT.
 - D. Additions and extensions to the IFSP that require funding changes must be approved by CPMT before payment. Funding for emergency services will follow local policy.
 - E. Reimbursements (i.e. SSI, child support, SSA, trust funds) shall be credited to child specific accounts according to policies set by the State.
- XX. The Community Policy and Management Team adopts the Fraud Policy of Clarke County as outlined in the Clarke County Department of Joint Administrative Services Purchasing Department Procurement Policies and Procedures. These policies and practices are designed to prevent and detect fraud. (adopted 2/25/19)
- XXI. The Community Policy and Management Team has the authority to submit grant proposals and to enter into contracts for the provision or operation of services upon approval of the participating governing bodies [§2.1-752.10](#)

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- A. The Community Policy and Management Team, in seeking any grants or other resources for services, shall obtain the approval of the governing body of Clarke County.
 - B. Services authorized for purchase by the Community Policy and Management Team shall be from providers listed by the Children's Services Act in the Service Fee Directory and:
 - 1. Individuals, not associated with an entity, providing services
 - 2. Individually approved foster care families
 - 3. Purchase of goods
 - 4. Non-specialized services (community activities only indirectly associated with care, e.g. swimming lessons, transportation, baby-sitting, etc.).
 - 5. Any service which requires licensure can only be rendered by a provider licensed to provide that service in Virginia.
 - 6. Intensive Care Coordination (ICC), as part of the High Fidelity Wraparound Model, is a service available for youth in out of home care or youth at risk of out of home care. The Clarke County FAPT will determine the need for ICC and purchase the service if identified on the youth's service plan.
 - C. Procedures for obtaining bids for new services shall follow procurement guidelines of the State and locality.
 - D. Local government may be petitioned to consider rollover of budgeted but unspent local match funds into the next fiscal year.
 - E. The budget process for the Community Policy and Management Team shall follow the fiscal management policies of Clarke County.
- XXII. Services provided by the Community Policy and Management Team and Family Assessment and Planning Teams shall not discriminate on the basis of race, sex, age, religion, socio- economic status, handicapping conditions or national origin.
- XXIII. Due process for complaints and appeals will be in accordance with regulations set forth by the State. There are three due process systems available. The special education system, which involves state level review, the social service system that involves both local and state level review, and the courts. These systems are established by federal and state requirements separate from the Act and are available to youths and families, as appropriate. There is no state review system solely for the Children's Services Act. State due process systems supporting special education and foster care are not impacted by the CSA. The parents/legal guardians have the right to a review if they disagree with any part of their child's assessment or service plan.
- A. Parents/Legal Guardians will be notified in writing of the locality's due process procedures at the initial FAPT presentation and will sign a form acknowledging receipt of the due process information;
 - B. The parents/legal guardians will state their disagreement in writing to the FAPT Chairperson within ten (10) business days of receipt of the FAPT approval/disapproval letter. The FAPT Chairperson will forward the documentation to the chairperson of the CPMT. The appeal will be placed on the agenda of the next CPMT meeting.
 - C. The Community Policy and Management Team will review the decision of the FAPT and provide a written response within 10 business days of the CPMT meeting.
- XXIV. The Clarke County CPMT maintains policies and procedures for records management of the Individual Family Service Plans and other documentation consistent with minimum state and federal requirements.
- A. The original CSA documents are maintained in the agency file. The retention of and destruction of original records is based on the agency's retention and destruction policy under whose purview the record originated.

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- B. 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. Duplicate.
- C. CSA documents are maintained in the CSA record. 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. This information can be found at the following website:
<http://www.lva.virginia.gov/agencies/records/retention.asp>
- D. The Clarke County CPMT adheres to requirements of the Family Education Rights and Privacy Act and the Code of Virginia regarding education records. Education records are broadly defined as all records maintained by the education agency.
 - 1. All records related to and all information about specific children and families obtained by FAPT/MDT, CPMT, and Clarke County CSA shall be confidential.
 - 2. FAPT/MDT, CPMT, and Clarke County CSA shall use a secure electronic database to 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 D 11 of [§2.2-2648](#).
 - 3. IFSP and other documentation shall be managed in accordance with state and federal requirements.
 - 4. Education records shall be handled in accordance with the Family Education Rights and Privacy Act and the Code of Virginia. Clarke County CPMT defines education records broadly as all child specific records maintained by or shared with CPMT from education agencies.
 - 5. Retention and destruction of original records shall be based on the agency of origin's retention and destruction policy based on the governing Library of Virginia (LoV) Records and Disposition Schedule.
 - a. The appropriate state record officers shall sign off on forms before destroying any public record.
 - b. Duplicates of original records may be purged as deemed necessary, however they shall not be maintained longer than specified by applicable LoV schedules for the original record in question.
 - 6. Only CANVaS Designated Super Users/Report Administrators (DSU/RA) or public agency case managers who are responsible for CANS assessments shall attempt to establish accounts or otherwise access this system.
 - a. All users of CANVaS shall sign a Users' Agreement.
 - b. A case manager's supervisor and the DSU/RA or the Office of Comprehensive Services as appropriate based on the user's role shall authorize all Users' Agreements.
 - c. Case manager access shall be limited to the assessments they enter and the reports generated by those assessments.
 - d. Passwords shall meet required minimum standards.
 - e. Case manager access shall be terminated and the account deactivated should the case manager leave employment with the agency.
 - f. DSU/RAs shall periodically check the listing of case managers with accounts to ensure accounts of those who have left employment have been deactivated.
 - g. Certain Super Users shall be designated to serve as Report Administrators.

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- i. Report Administrators authorize case manager access to CANVaS and shall have access to our locality CANVaS data.
 - ii. Requests to become or to no longer serve as the DSU/RA or RA for this locality shall be handled in accordance with Office of Comprehensive Services requirements.
 - h. Certification to use the Virginia Child and Adolescent Needs and Strengths (CANS) assessment shall be renewed annually.
- XXV. The Clarke County CSA office will be in charge of the Local Money Only Fund, which is available to youth and families that do not qualify for CSA funding or are services outside the realm of CSA policy. This money is allocated by the Board of Supervisors on an annual basis, as money is available. In order to access these funds, the following procedures shall be followed:
- A. The Local Money Only Checklist must be completed and submitted to the CSA Coordinator or the CPMT Chairperson at least two (2) weeks prior to the beginning of the services requested.
 - B. Effective September 1, 2016, parents/guardians must self-certify their monthly income as being no more than 185% of poverty for their family's size. The Local Money Only Declaration of Income must be submitted prior to approval of the requested expenditure. If a family's income is over the amount list, the child is not eligible for Local Money Only funds.

Approved by CPMT

June 16, 2016

(Local Money Only Policy)

XXVI. The Clarke County CPMT agrees to adopt the policy of the Clarke County Board of Supervisors with regard to electronic signature (Policy 1-12 of Clarke County Board of Supervisors Rules and Procedures) 9/17/2018

Clarke County Children's Services Act Policies and Procedures updated 5/20/2019

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PARENTAL RESPONSIBILITY FOR CSA SERVICES (updated 4/2023)

The Clarke County Community Policy and Management Team (CPMT) hereby sets the policy and procedures for parental involvement and financial contribution to the cost of services provided by Children's Services Act (CSA) funding. Those funds include state pool funds allocated by the Virginia General Assembly and monies appropriated by the Clarke County Council for the provision of services associated with CSA.

This policy and these procedures are established pursuant to Section 2.2-5206 of the Code of Virginia (1950), as amended.

POLICY

A guiding principal of the CPMT is to ensure that parents and/or legal guardians shall be active and equal participants in all aspects of assessment, planning and implementation of services their children may require. Part of that guiding principal is to have the parent and/or legal guardian share in the time and financial cost of services provided at a level consistent with the parent's ability to contribute to these needs. Pursuant to this guiding principal all parents of children receiving CSA-funded services shall be assessed for parental financial contributions in accordance with the policies, procedures and fee schedules adopted by the CPMT.

For purposes of determining monthly gross income as it applies to parental co-payment responsibilities, the following definitions are adopted: "Parent" is defined as biological or adoptive parent. "Child" is defined as biological or adopted child up to age 22.

It is the position of the Clarke County CPMT that parents of children in cases presented to the Clarke County CPMT for funding, and presented to the Family Assessment and Planning Team (FAPT) for planning and services, shall pay a portion of the cost for approved CSA funded services. However, Clarke County CPMT recognizes that all parents cannot afford to contribute any amount of payment for the approved services.

CPMT adopts the following procedures for determining the amount of parental responsibility:

PROCEDURES

- A. Parental contribution assessments shall be done by the CSA case manager referring the family to the Family Assessment and Planning Team, except:
 1. Parents of children receiving educational services pursuant to an Individualized Education Plan (IEP) are exempt from parental financial contribution requirements for those IEP services.
 2. Parents of children in the custody of the Department of Social Services (DSS) or placed out of the home by non-custodial or parental placement agreement will be referred to the Division of Child Support Enforcement for parental financial support obligations.

CLARKE COUNTY CHILDREN'S SERVICES ACT
POLICIES AND PROCEDURES

3. Recipients of Temporary Assistance to Needy Families (TANF) are exempt from the parental contribution requirements.
- B. Referral to the Division of Child Support Enforcement-for Foster Care Services and Out of Home Placements:
1. Families of youth who are receiving Foster Care Services and support through the Clarke County Children's Services Act as defined in the Code of Virginia § 63.2-905 ii & iii will be referred to the Division of Child Support Enforcement (DCSE). Due to the financial responsibility to pay child support, the Clarke County CPMT will not assess a co-payment to families who have been referred to DCSE.
 2. Eligibility: The Parents/Legal Guardians of the following youth will be referred to the DCSE:
 - a. Youth placed in the custody of Clarke County Department of Social Services
 - b. Youth who are receiving Foster Care Services through a Non-Custodial Agreement (DSS) or Parental Agreement (Non-DSS)
 - c. Youth placed in the custody of Clarke County through an Entrustment
 3. Methodology: When a child enters foster care or non-custodial foster care, including a Parental Agreement, the child's case manager (or CSA staff for Parental Agreements) shall file the appropriate application for child support with the State Division of child Support Enforcement (DCSE). The case manager shall provide DCSE with any additional information they need to determine or collect child support.
 4. Good Cause: The CPMT has the authority to determine Good Cause for families receiving Foster Care Services through a Parental Agreement.
 - a. The establishment of Good Cause will only be considered for families who can provide documentation of financial hardship and allows for a temporary suspension of the DCSE referral. Examples of Good Cause may include homelessness or dependency on Social Security disability. General costs of daily living, e.g. Mortgage, rent, utilities, are not considered sufficient reasons for Good Cause determination.
 - b. Good Cause will be determined on a case by case basis. To request Good Cause, the Parent/Legal Guardian must submit a letter in writing within 14 days of funding approval to the CPMT Chair with an explanation of financial hardship.
 - c. Documentation of financial hardship must accompany the letter. The letter should be provided to the CSA Coordinator and shall be included in the next regularly scheduled CPMT meeting agenda.
 - d. The CPMT shall review the documentation provided and render a decision, which shall be final.
 - e. Within 30 days of the review, the CSA Office shall notify the family in writing of the decision of the CPMT
- C. The case manager shall provide the family with a full explanation of the CSA process. This explanation will include an advisement that the parents will be expected to assume an active role in the planning and delivery of services for their child (children), including a time and financial contribution.
- D. The steps for assessing the parental time and financial contribution are:
1. Determine the family income.

CLARKE COUNTY CHILDREN'S SERVICES ACT
POLICIES AND PROCEDURES

- a. Income includes, but is not limited to, gross wages (full-time, part-time, primary and secondary employment), pension and retirement benefits, spousal support or alimony, interest, dividends, payments from annuities, trusts, life insurance policies, income from other forms of investment, or any income received on behalf of the child.
 - b. Money received on behalf of the child includes, but is not limited to, child support, Supplemental Social Security Income (SSI), other payments from the Social Security Administration, and those sources of income listed in Section C (l a.) of this policy.
 - c. Parents who do not reside in the same home shall be assessed individually, when feasible. The parent paying child support shall have that amount deducted from his/her co-pay.
 - d. The assessed parental financial contribution is unaffected by the number of children in one household receiving CSA-funded services.
2. Use the Household Income Form to determine the amount of the parental financial contribution.
 3. Inform the parent(s) of the result of the assessment, including how the assessment was determined and how much the parent(s) is expected to contribute financially. Explain that the assessment is a partial reimbursement to the CSA budget for the cost of services provided.
 4. Discuss commitments of time that the parent must make in the case. The parent needs to attend and participate in all FAPT meetings, participate with the service provider in the development of a treatment plan, follow through with their responsibilities as outlined in the treatment plan, and communicate on a regular, ongoing basis with their child's case manager.
 5. Review and complete the Parental Responsibility Agreement form with the parent(s). Review the commitments of time that the parent will contribute to their child's treatment, and specify the amount of their monthly financial contribution. Ask the parent(s) to sign the Agreement. The parent(s) must receive a copy of the Agreement.
- E. The Parental Co-Payment Initial Screening Form, Household Income Form, and the Parental Responsibility Agreement are to be attached to and made part of the FAPT referral packet.
- F. The CPMT shall approve the amount of parental contribution assessed by the case manager.
- G. If the parent disagrees with the amount of parental contribution approved by the CPMT, the parent can appeal the CPMT decision by completing the Co-Payment Appeal form and submitting it to the CSA coordinator to review with CPMT at the next scheduled meeting. Appeals should be made if the parent is unable to pay the full monthly assessed obligation. The final determination will be made by the CPMT.
- H. The amount of parental financial contribution shall not exceed the cost of the CSA-funded services provided to the child.
- I. If a child is to be placed in a residential facility under a Parental Agreement as defined in COV Section 2.2-5212, the parent must first complete the application for the child to become eligible for Medicaid as a "family of one" if the child does not have Medicaid coverage. This must occur before the placement is permitted to occur. The only exception is if the placement is deemed by the CPMT to be an emergency.
- J. Provider Responsibility:

CLARKE COUNTY CHILDREN'S SERVICES ACT
POLICIES AND PROCEDURES

1. Service providers are responsible for the collection of the family's assessed financial contribution.
2. The amount of the assessed co-payment shall be deducted from the authorized funding amount when the purchase of service order is issued.
3. Should multiple service providers be authorized during the same monthly service period, the amount of co-payment shall be applied to the highest cost of service or most consistent, continuous service being funded.
4. In the event a family fails to pay the assessed co-payment, it will be at the service provider's discretion the action it chooses to take to recover those fees. It is not the practice of the CPMT to direct the vendor in its business practice and collection process. The vendor shall notify the case manager and CSA Coordinator of the family's failure to pay, and its collection procedure, if any.
5. The CSA Coordinator is responsible for monitoring vendor compliance with the Clarke County Parental Reasonability Policy and ensures amounts collected are accurately recorded in the CSA financial reports. Should a family become delinquent, they may utilize the process of appeal that is stated in this policy. During the appeal process, services will continue.

Emergency Funding Requests (updated 4/2021)

Authority

This policy was developed in accordance with COV § 2.2-5209 to address issues in delaying emergency services. This policy shall revoke any previous guidance or statement of policy issued by the Clarke County CPMT regarding the use of CSA State Pool Funds to pay for Emergency Services.

Criteria

Emergency Funding may only be used for youth eligible for State Pool Funds under the mandated category and in instances where it has been determined that services must begin prior to the next CPMT meeting.

Emergency Funding requests may be available to youth and/or families who:

- Are assessed as *High* or *Very High Risk* through the Family Risk Assessment Tool
- Have exhibited behaviors within the past 30 days that place the youth or another person at imminent risk of harm
- Require services within the next 30 days to prevent removal, disruption, or additional harm to the youth or another person.

Risk must be clearly documented with justification of need for immediate services. Eligibility documentation must accompany funding requests for cases not currently open to CSA. Emergency Funding may be denied for chronic behavioral issues where immediate risk to self and/or others is not clearly documented. Emergency Funding shall not be approved for services that do not reduce or alleviate immediate risk of: change of placement, harm to self or others, or assist in determination of such risk. Such services shall be approved through the regular review process.

Policy

Emergency Funding requests shall be authorized by the CPMT Chairperson or his/her designee upon the recommendation of the CSA Coordinator. In the case where the CSA Coordinator is not available for signature, only the signature of the CPMT Chairperson or his/her designee is required. The designee of the CPMT Chairperson shall not be from the referring agency. In the case where the referring agency is that of the CPMT Chairperson, the Vice-Chairperson or his/her designee will sign.

CSA-funded services shall not commence until the emergency funding request is approved. Requests must be reviewed by FAPT within 14 days, except in cases where FAPT has reviewed the case and

CLARKE COUNTY CHILDREN'S SERVICES ACT
POLICIES AND PROCEDURES

recommended the completion of Emergency Funding to start services immediately. The Emergency Funding request must be reviewed at the next scheduled CPMT meeting. Emergency Funding may only be authorized through the end of the month that CPMT reviews the case.

Process

During regular business hours, the Case Manager shall complete the Emergency Funding Request form and present it for approval by the CPMT Chairperson or his/her designee and the CSA Coordinator. Outside of regular business hours, the Case Manager shall contact the agency Director or his/her designee for approval of Emergency Funding. Within 2 business days, the Case Manager must complete the Emergency Funding Request form, obtain the signature of the CPMT Chairperson or his/her designee and the CSA Coordinator.

Emergency Funding and Budget Request Forms

The Emergency Funding Request form must be submitted to the CSA office to secure a FAPT review. The effective date shall be the date the service is initiated, with a termination date to be the last day of the month that CPMT meets. Any other services may be considered and reviewed through the regular approval process. Upon FAPT review, a budget request for services shall be completed and include any other services being provided and requested.

Exceptions

The following services do not require the signature of the CPMT Chairperson or his/her designee for Emergency Funding approval. Where required, an Emergency Funding form should be completed and submitted to the CSA Office when services are initiated and scheduled on the FAPT agenda for review within 14 calendar days.

1. Maintenance:

The authority to approve expenditures for cases involving only the payment of foster care basic maintenance is delegated by CPMT to the Director of the Clarke County Department of Social Services. Basic maintenance payments to foster families shall be approved by the DSS Director based on a rate scale approved by the Virginia Department of Social Services.

2. Goods and Services:

The authority to approve expenditures for foster care youth for goods and other services (medical/health, camp/recreation, etc.) up to \$200.00 per request is delegated by the CPMT to the Clarke County CSA Coordinator.

3. Special Education Private Day or Residential Placements:

The authority to approve expenditures for cases involving only the payment of Special Education Placements as required by the Individuals with Disabilities Education Act (IDEA) and an Individual Education Plan (IEP) lies with the IEP Team. Although federal regulations prevent the delay of IEP placements, every effort should be made to present the case for review by the FAPT and CPMT prior to the placement of the youth. In the case of Special Education funding, the Case Manager must submit a budget sheet to the CSA office with the new services, and the case will be scheduled on the next available FAPT agenda.



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

July 30, 2024

Leea Shirley, CPMT Chair
26th District Court Service Unit
10 Baker Street
Winchester, VA 22601

RE: Clarke County CSA Program Self-Assessment Validation (SAV)
Final Report, File No. 27-2024

Dear Leea Shirley,

Per the Office of Children's Services (OCS) Audit Plan for Fiscal Year 2024, the Clarke County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program. Based on the review and examination of the self-assessment workbook and supporting documentation completed by the Clarke County CSA program on February 21, 2024, and covering the period January 1, 2023 through December 31, 2023, our independent validation:

Concurs

Partially Concurs

Does Not Concur

The Clarke County CPMT concluded that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted. The explanations for our assessment results are as follows:

The Clarke County CPMT concluded that there were no significant compliance or internal control weakness observations. Attachment A includes a summary of non-compliance observations reported by the CPMT as nonsignificant. However, validation procedures identified deficiencies indicating non-compliance by the local program and internal control weaknesses that the CPMT did not identify. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully following state law. An adequate system of internal controls is contingent upon the consistent and proper application of established policies and procedures and monitoring oversight by the governing authority to ensure that the program is operating accordingly. Such breakdowns in an organization's internal control structure are considered significant. Specifics of the Clarke County CSA Program are detailed on pages 2-3.

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS
 AND INTERNAL CONTROL WEAKNESSES**

Observation 1: Expenditure reimbursements were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet. At least one exception was observed in each of the six (6) client records examined to validate compliance, resulting in questioned costs totaling \$13,790.92 (state share). Notable non-compliance observations are detailed in the tables below.

Table A Client File Review Exception Summary – Fiscal Impact (See Attachment B for Breakdown by Client)		
Exception Rate	Description	Questioned Cost (State Share)
83% (5/6)	1. <u>Service Plans</u> . Individual and Family Services Plans (IFSP) provided for review did not include services funded. <i>This exception was also observed in the previous audit.</i> Criteria: Code of Virginia (COV) §2.2-5208	\$7,431.10
50% (3/6)	2. <u>Eligibility</u> . Insufficient documentation establishing eligibility to access funding (Child in Need of Services/CHINS and Special Education Wraparound/). Criteria: COV §2.2-5212, CSA Policy 4.1 Eligible Populations, and CSA Policy 3.5 Records Management	\$7,133.18
17% (1/6)	3. <u>Financial Reporting</u> . Transactions were recorded using the wrong expenditure category and applicable match rate. The error resulted in the local program paying a higher share of the service cost. Criteria: CSA Policy 4.5.2 Pool Fund Reimbursements	(\$773.36)
Due to CSA		\$13,790.92

Table B Client File Review Exception Summary – No Fiscal Impact	
Exception Rate	Description
100% (6/6)	4. <u>Utilization Review</u> . Evidence of utilization review of funded services. CPMT reported the exception as nonsignificant. Criteria: COV§ 2.2-5208.
50% (3/6)	5. <u>Parental Contributions</u> . Parent copay assessments were not documented. Criteria: COV § 2.2-5206 and §2.2-5208
50% (3/6)	6. <u>Data Collection</u> . Key data elements were missing from IFSPs, such as discharge planning, measurable goals/objectives, or duration of services. Criteria: CSA Policy 3.5 Records Management
33% (2/6)	7. <u>Confidentiality</u> . Consent to exchange information forms was not obtained for clients who received CSA-funded special education (SPED) and SPED wraparound services. Absent a signed consent to share information between the school and the local CSA program, eligibility to access funding cannot be confirmed. This internal control weakness could expose the program to liability for violations of the Federal Educational Rights and Privacy Act (FERPA) or similar statutes and regulations. Criteria: COV §2.2-5210, CSA Policy 3.5 Records Management, and OCS Administrative Memo #23-10 <u>Eligibility for CSA Funding for Private Special Education Placements</u>
33% (2/6)	8. <u>Data Integrity</u> . The service name description for reported expenditure transactions was miscoded in financial reporting systems. Criteria: CSA Policy 4.5.2

**SIGNIFICANT NON-COMPLIANCE OBSERVATIONS
AND INTERNAL CONTROL WEAKNESSES**

Observation 2: CPMT monthly meeting minutes and accompanying reports did not evidence Continuous Quality Improvement/utilization review (CQI/UR) activities to include:

- A. Reviewing local and statewide data provided in the management reports on the number of children placed out of state, demographics, types of services provided, duration of services, child and family outcomes, and performance measures.
- B. Tracking the utilization and performance of 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 settings, or their community.

Criteria: COV [§ 2.2-5206](#) and [§ 2.2-3707](#)

Observation 3: The Clarke County CSA strategic plan presented by the CPMT covered dates effective 2020-2023. CPMT minutes during the review period did not record any discussion of progress toward achieving stated goals and objectives or updates to the adopted strategic plan since December 2021.

Criteria: COV [§ 2.2-5206](#) and [§ 2.2-3707](#)

RECOMMENDATIONS

Observation 1:

1. During service planning, the FAPT and the CSA Coordinator should ensure that minimum documentation requirements are met and relevant documents are maintained in individual client case files.
2. Before funding authorization, the CPMT should ensure that the proposed expenditure meets the criteria for CSA funding or other appropriate funding sources. Adequate documentation, including consideration of different funding streams, should be maintained as justification for CPMT funding decisions.
3. FAPT and CPMT should ensure that utilization review activities are recorded for all clients. Following the established utilization review schedule and guidelines, documentation should capture progress or lack thereof with the recommended interventions.
4. Periodic case file reviews should be performed by someone other than the CSA Coordinator to establish quality control of client records and to ensure compliance with CSA statutory requirements.
5. The CSA Coordinator and Fiscal Agent should ensure that expenditure transactions (payments and refunds) are recorded accurately and supporting documentation is maintained accordingly.

RECOMMENDATIONS

Observation 1 (Continued):

6. The CPMT should submit a quality improvement plan for review by the OCS Finance Office, including whether the CPMT agrees with the observations regarding questioned costs. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director based on SEC-approved policy 4.7, Response to Audit Findings, of whether the identified actions are acceptable or any additional actions that may be required.

Observations 2 and 3:

1. The CPMT minutes should document the outcome of CQI activities and report strategic planning progress. Utilization management tools and resources are available on the CSA website to support local program efforts to meet compliance requirements.
(<https://csa.virginia.gov/Resources/ContinuousQualityImprovement>).
2. Supporting documentation should be maintained with the recorded minutes.

CLIENT RESPONSE

See Attachment C

OCS respectfully requests that you submit a quality improvement plan (QIP) to address the observations in this report by thirty (30) days from the date of receipt of this report. In addition, we ask that you notify this office when the specified QIP tasks are completed. OCS will conduct a follow-up validation to ensure that quality improvements have been implemented as reported.

We thank the Clarke County Community Policy and Management Team, CSA staff, and partners for contributing to the CSA Self-Assessment Workbook. We also acknowledge Nadia Acosta, CSA Coordinator, who provided excellent assistance and cooperation during our review. Ms. Acosta's efforts enabled the audit staff to resolve any questions/concerns observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
Chris Boies, Clarke County Administrator
Brenda Bennett, CPMT Fiscal Agent
Nadia Acosta, CSA Coordinator

Attachments



CSA Self-Assessment Validation
Clarke County CSA Program Audit- SAV
Summary of Self-Reported Non-compliance Observations

Observations	Criteria	Prior Audit Repeat Observation	Quality Improvement Plan Submitted	Quality Improvement Plan Action Date/Status
Lack of utilization review.	COV <u>§ 2.2-5208</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3/15/24 In progress

Auditor Comment: Clarke County CPMT self-reported the non-compliance observation in the table above as nonsignificant. However, compliance criteria are established in the Code of Virginia. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with state law.



**CSA Self-Assessment Validation
Clarke County CSA Program Audit- SAV**

Client File Review Exception Detail – Fiscal Impact					
Rate	Exception Code/Description				
83%	1. Service Plans. Individual and Family Services Plans (IFSP) provided for review did not include services funded. This exception was also observed in the previous audit. Criteria: COV 2.2-5208				
50%	2. Eligibility. Insufficient documentation establishing eligibility to access funding (Child in Need of Services/CHINS and Special Education Wraparound/). Criteria: COV 2.2-5212, CSA Policy 4.1 Eligible Populations, and CSA Policy 3.5 Records Management				
17%	3. Financial Reporting. Transactions were recorded using the wrong expenditure category and applicable match rate. The error resulted in the local program paying a higher share of the service cost. Criteria: CSA Policy 4.5.2 Pool Fund Reimbursements				
Code	Client	Service Description	Period	Total Cost	State Share
1	B	Adventure Camp	Mar 2023	\$1,824.00	\$1,386.42
	C	Equine Therapy	Feb – Sep 2023	\$715.00	\$481.13
	D	Case Support	Dec 2022 ^{Note1}	\$500.00	\$380.05
	E	Mental Health Treatment	Dec 2023	\$1,600.00	\$1,216.16
	F	Mentoring & Family Support Partner	Nov 2022 ^{Note1} / Nov 2023	\$5,219.50	\$3,967.34
2	B	SPED Wraparound Services	Dec 2022 ^{Note1} – Oct 2023	\$13,449.75	\$6,997.90
	C	SPED Wraparound Services	Oct – Nov 2022 ^{Note1}	\$260.00	\$135.28
	E	Mental Health Treatment	Dec 2023	Note2	Note 2
3	D	Independent Living	Nov 2023	N/A	(\$773.36)
Due to CSA				\$23,568.25	\$13,790.92
<p>Note 1: Denotes payments for services incurred were actually paid during the review period. Note 2: Cost of services was included with exception code 1.</p>					



CSA Self-Assessment Validation
Clarke County CSA Program Audit- SAV
Client Response



Children's Services Act
Clarke County, Virginia

July 25, 2024

Ms. Stephanie Bacote
OCS Program Audit Manager
Office of Children's Services
1604 Santa Rosa Road
Suite 137
Richmond, VA 23229

RE: Clarke County CSA Program Self-Assessment Validation Final Report, File No. 27-2024
Response from Clarke County CPMT

Dear Ms. Bacote,

The Clarke County CPMT has received and reviewed the Children's Services Act Program Audit report for Clarke County, Audit Report No. 27-2024. We would like to thank you for your time and effort in both reviewing our CSA program and presenting the findings.

The Clarke County CPMT (CPMT) has actively addressed the non-compliance observations identified, including consideration of the recommendations outlined in the report. The following actions have been taken at this time:

Observation 1, Table A:

1. "Individual and Family Services Plans provided for review did not include services funded."

CPMT adopted using the thorough OCS model IFSP to be used effective March 1, 2024. A training for all Clarke County CSA case managers was completed on 02/20/2024. CPMT has also implemented a review process of all active CSA cases. This review process will occur at least once a year to ensure all IFSP documentation is complete and current.

2. "Insufficient documentation establishing eligibility to access funding (Child in Need of Services/CHINS and Special Education Wraparound)."

CPMT determined a review process is necessary of all active CSA files at least once a year to ensure all eligibility documentation is current and complete. As part of the strategic planning process, CPMT created an online case manager portal. FAPT case managers have access to the portal and documents including a list of required documentation for clients to access to CSA services.

Children's Services Act
Clarke County, Virginia



3. "Consent to exchange information forms was not obtained for clients who received CSA-funded special education (SPED) and SPED wraparound services. Absent a signed consent to share information between the school and the local CSA program, eligibility to access funding cannot be confirmed."

CPMT was able to recover the missing consent forms from the case managers as they were being maintained in the case manager file. The consent forms have been placed in the client's CSA files. CPMT has created a case manager portal that provides access to the required documentation for CSA cases to be brought to FAPT. The CSA Coordinator will not provide a FAPT meeting date for a case until a new or current consent to exchange information is received.

4. "Transactions were recorded using the wrong expenditure category and applicable match rate. The error resulted in the local program paying a higher share of the service cost."

The CSA Coordinator has been completing training to be able to correctly record expenditures and their categories. The Coordinator participated in a virtual training with Thomas Brothers and has been receiving training from the finance department in-house.

Observation 1, Table B:

1. "Evidence of utilization review of funded services.

CPMT reported the exception as nonsignificant." Clarke County CPMT (CPMT) concedes that this is a significant exception. CPMT has determined it is necessary to complete a review of all open case files at least once a year to ensure required utilization review is being completed.

2. "Parental copay assessments were not documented."

The previous understanding had been that SPED Wraparound cases were exempt from parental copay assessments. CPMT has reviewed the policy from the Office of Children's Services regarding parental co-pay assessments and this misunderstanding has been corrected. Parental copay assessments have been completed on all open SPED Wraparound cases and will be completed for any future SPED Wraparound cases. CPMT has created a case manager portal on the Clarke County CSA website that contains a list of all required documentation to open a CSA case. The list has been updated to reflect the need for a parental copay assessment on any SPED Wraparound cases.



Children's Services Act
Clarke County, Virginia

3. "Key data elements were missing from IFSPs, such as discharge planning, measurable goals/objectives, or duration of services."

CPMT implemented a new, more thorough IFSP to be used effective March 1, 2024. A training for all Clarke County CSA case managers on completing the new IFSP was held on 02/20/2024. The CSA Coordinator will provide regular training on how to properly complete the IFSP.

4. "The service name description for reported expenditure transactions was miscoded in financial reporting systems."

The CSA Coordinator will continue to attend any trainings on expenditures and has been working with the financial reporting system to learn how to properly code things. The CSA Coordinator will use financial guidance provided by OCS to ensure all transactions are coded appropriately. The CSA Coordinator and the fiscal agent will continue to work together to ensure that all transactions are recorded and reported accurately.

Observation 2: "CPMT monthly meeting minutes and accompanying reports did not evidence Continuous Quality Improvement/utilization review (CQI/UR) activities."

The Clarke County CPMT has added a section to the regular monthly agenda of CQI/UR and will monitor and discuss utilization rates in the financial report. All supporting documentation will be included in the minutes.

Observation 3: "The Clarke County CSA strategic plan presented by the CPMT covered dates effective 2020-2023. CPMT minutes during the review period did not record any discussion of progress toward achieving stated goals and objectives or updates to the adopted strategic plan since December 2021."

CPMT began creating a new strategic plan to cover FY25-FY27. This plan was finalized in June 2024. CPMT will discuss progress towards stated goals and objectives at least quarterly.

As requested in the draft of the audit report, Clarke County CPMT will also submit a Quality Improvement Plan (QIP) to ensure that the observations and lapses in compliance will be addressed in a timely manner.

Clarke County CPMT would like to express gratitude for the opportunity to respond to the findings and for the engagement with the Clarke County CSA program. We look forward to improving our program in accordance with established guidance and providing the best possible outcomes with fiscal soundness.

Sincerely,

A handwritten signature in black ink that reads "Leea Shirley, RN".

Leea Shirley

Chair, Clarke County CPMT



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status Click here to enter a date.	
				In Progress	Completed
1.	Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	FAPT, CSA Coordinator	10/1/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 The required list of documentation for FAPT review has been updated and published on a case manager portal, which all Clarke County case managers have access to. The IFSP template has been updated to the model IFSP published on the OCS website, and a training for this new IFSP for all Clarke County case managers was completed on 02/20/2024. The CSA Coordinator is not scheduling new FAPT cases without ensuring that all required documentation is met. FAPT continues to review all documents submitted for both new and review cases. The CSA Coordinator has been able to locate some of the documents listed as missing and will continue to monitor the current IFSP to ensure accurate data recording. This task is an ongoing task.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		

//////////////////////////////////////
For OCS Program Auditor Use Only



CSA Financial/Compliance Program Audit Quality Improvement Plan

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
1.	Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	CPMT, CSA Coordinator	10/1/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 At this time, due to Clarke County CPMT policy, no identifying information is presented to CPMT when FAPT recommendations are presented for funding authorization. CPMT will be rewriting policy to ensure that adequate documentation and information is presented to CPMT with funding authorization requests; CPMT will also review the policy preventing identifying information from being presented with funding authorization requests and see if this policy can be removed or edited. The CSA Coordinator has begun presenting redacted FAPT minutes and FAPT recommendations with the funding authorization requests to ensure that CPMT is able to make informed decisions based on mandate eligibility, utilization, consideration of other appropriate funding sources, and outcome tracking.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		

//////////////////////////////////////
For OCS Program Auditor Use Only



CSA Financial/Compliance Program Audit Quality Improvement Plan

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



CSA Financial/Compliance Program Audit Quality Improvement Plan

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024		
				In Progress	Completed	
1.	Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	FAPT and CPMT should ensure that utilization review activities are recorded for all clients. Following the established utilization review schedule and guidelines, documentation should capture progress or lack thereof with the recommended interventions.	CPMT, FAPT, CSA Coordinator	10/1/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 At this time, due to Clarke County CPMT policy, no identifying information is presented to CPMT when FAPT recommendations are presented for funding authorization, including IFSPs with utilization review documents attached. CPMT will be rewriting policy to ensure that adequate documentation and information is presented to CPMT with funding authorization requests; CPMT will also review the policy preventing identifying information from being presented with funding authorization requests and see if this policy can be removed or edited. The CSA Coordinator has begun including utilization information with the funding authorization requests to CPMT. The CSA Coordinator has been completing utilization reviews on each case that comes before FAPT and including the reviews and findings in the IFSPs presented to FAPT.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		



For OCS Program Auditor Use Only



CSA Financial/Compliance Program Audit Quality Improvement Plan

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
1.	Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	CPMT	10/31/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 CPMT is working on setting up a periodic case file review to occur at least annually. Each member of CPMT will review a certain number of the cases currently open to CSA and then will present their findings at the October 2024 CPMT meeting. CPMT will be reviewing and rewriting policy to include such a periodic review every fiscal year.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		



For OCS Program Auditor Use Only

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



Effective Date 12/12/2013

CSA Financial/Compliance Program Audit Quality Improvement Plan



CSA Financial/Compliance Program Audit Quality Improvement Plan

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
1. Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	The CSA Coordinator and Fiscal Agent should ensure that expenditure transactions (payments and refunds) are recorded accurately and supporting documentation is maintained accordingly.	CSA Coordinator, Fiscal Agent	10/1/2024	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
[Click here to enter text.](#)

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		



For OCS Program Auditor Use Only

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



CSA Financial/Compliance Program Audit Quality Improvement Plan

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
1.	Expenditure reimbursement were requested and processed to pay services where the requirements for compliance with state and local CSA policies and procedures were unmet.	CPMT	8/29/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 The CPMT is submitting the quality improvement plan as requested. The CPMT agrees with the observations regarding questioned costs. A copy of the formal CPMT response to the audit draft has been included with this quality improvement plan.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		



For OCS Program Auditor Use Only

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



Effective Date 12/12/2013

CSA Financial/Compliance Program Audit Quality Improvement Plan



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS					
Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
2.	<p>CPMT monthly meeting minutes and accompanying reports did not evidence Continuous Quality Improvement/utilization review (CQI/UR) activities to include:</p> <p>A. Reviewing local and statewide data provided in the management reports on the number of children placed out of state, demographics, types of services provided, duration of services, child and family outcomes, and performance measures.</p> <p>B. Tracking the utilization and performance of placements using data and management reports to develop and implement strategies for returning children</p>	CPMT, CSA Coordinator	8/29/2024	<input type="checkbox"/>	<input checked="" type="checkbox"/>



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

<p>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 settings, or their community.</p>					
--	--	--	--	--	--

Please check if attachments are included.

If tasked described is not complete, please explain:

The CSA Coordinator and the CPMT have added a section to the regular CPMT agenda to go over CQI/UR activities. The CSA Coordinator is including utilization information in the funding authorization requests, and will continue to compile reports each month on demographics, services provided, duration of services, and outcomes for CPMT to review. This is an ongoing task.

PLAN APPROVAL

SIGNATURE:

Title:

Date:

PRINTED NAME:



For OCS Program Auditor Use Only

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Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



**CSA Financial/Compliance Program Audit
Quality Improvement Plan**

Audit Client Name:	Clarke County CSA
Audit/File Number	27-2024
Audit Report Date:	07/30/2024
Quality Improvement Plan Date:	8/19/2024

Instructions: A separate form must be completed for each audit observation included in the final report.

QUALITY IMPROVEMENT PLAN DETAILS

Observation No.	Task Description	Responsible Party	Target Date	Self Reporting Status 8/27/2024	
				In Progress	Completed
3.	<p>The Clarke County CSA strategic plan presented by the CPMT covered dates effective 2020-2023. CPMT minutes during the review period did not record any discussion of progress toward achieving stated goals and objectives or updates to the adopted strategic plan since December 2021.</p> <p>The CPMT minutes should document the outcome of CQI activities and report strategic planning progress. Utilization management tools and resources are available on the CSA website to support local program efforts to meet compliance requirements.</p> <p>Supporting documentation should be maintained with the recorded minutes.</p>	CPMT, CSA Coordinator	8/29/2024	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please check if attachments are included.

If tasked described is not complete, please explain:
 CPMT has created a new strategic plan for FY2025-2027. CPMT will be reviewing the strategic plan every couple of months to track progress and update the strategic plan as needed. This is an ongoing task.

PLAN APPROVAL

SIGNATURE:	Title:	Date:
PRINTED NAME:		





CSA Financial/Compliance Program Audit Quality Improvement Plan

For OCS Program Auditor Use Only

<input type="checkbox"/> Check if action plan is acceptable	Date received: Click here to enter a date.	Reviewed by: _____ Date: Click here to enter a date.
Action implemented: <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not Satisfactory	Date verified: Click here to enter a date.	Verified by: Click here to enter text.



Children’s Services Act
Clarke County, Virginia

FY25 CSA Case File Review

In the final audit report for Clarke County CSA, it was recommended that a periodic review of case files be completed by someone other than the CSA Coordinator to ensure that all necessary documentation is in the case files and kept up to date. At the CPMT meeting in June 2024, it was suggested that every CPMT member review a few of the case files and then compile the findings for presentation at a CPMT meeting for a later date. The CSA Coordinator would like to propose that as CPMT will be meeting on September 5th, 2024, for a policy rewrite work session, that the case files be reviewed in late September-October with the findings compiled and reported at the CPMT meeting for October 2024.

The case files are maintained in person at the CSA Coordinator’s office. The CSA Coordinator will make all case files available as each CPMT member’s schedule allows for such review.

The following case numbers are either currently open, or will be closed as of 08/31/2024, and are thus up for review for a total of 26 cases:

315	354	371	378	384	398
343	356	372	379	385	
344	357	375	380	386	
345	362	376	381	387	
350	364	377	382	388	



CSA FY 24 - POOL REIMBURSEMENT REQUEST REPORT—PART 1

DATE: August 07, 2024	FOR PERIOD ENDING: July 31, 2024 Report ID: 42102 File Name: csa_43_m_2024_7_1.txt
LOCALITY: Clarke -FIPS 43	Contact Person: Nadia Acosta Phone Number: 540-955-5198

PART 1 - EXPENDITURE DESCRIPTION

EXPENDITURE DESCRIPTION	LOCAL MATCH RATE (a)	GROSS TOTAL EXPENDITURES THIS PERIOD (b)	EXPENDITURE REFUNDS THIS PERIOD (c)	NET TOTAL EXPENDITURES (b minus c) (d)	LOCAL MATCH (a x d) (e)	STATE MATCH (d-e) (f)
1. CONGREGATE CARE / MANDATED AND NON-MANDATED RESIDENTIAL SERVICES						
1a. Foster Care - IV-E children in Licensed Residential Congregate Care; pool expenditures for costs not covered by IV-E (i.e., non room-and-board)	\$0.5996	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
1b. Foster Care - all others in Licensed Residential Congregate Care	\$0.5996	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
1c. Residential Congregate Care- CSA Parental Agreements ; DSS Noncustodial Agreements	\$0.5996	\$2,905.00	\$0.00	\$2,905.00	\$1,741.84	\$1,163.16
1d. Non-Mandated Services/Residential/Congregate	\$0.5996	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
1e. Educational Services - Congregate Care	\$0.4797	\$2,601.10	\$0.00	\$2,601.10	\$1,247.75	\$1,353.35
2. OTHER MANDATED SERVICES						
2a. Treatment Foster Care - IV-E	\$0.4797	\$9,150.00	\$0.00	\$9,150.00	\$4,389.26	\$4,760.74
2a.1 Treatment Foster Care	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2a.2 Treatment Foster Care - CSA Parental Agreements ; DSS Noncustodial Agreements	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

2b.	Specialized Foster Care - IV-E ; Community Based Services	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2b.1	Specialized Foster Care	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2c.	Family Foster Care - IV-E ; Community Based Services	\$0.2399	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2d.	Family Foster Care Maintenance only	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2e.	Family Foster Care - Children receiving maintenance and basic activities payments; independent living stipend/arrangements	\$0.4797	\$3,628.54	\$0.00	\$3,628.54	\$1,740.61	\$1,887.93
2e.1	State Kinship Guardianship	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2e.2	Federal Kinship Guardianship	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2f.	Community - Based Services	\$0.2399	\$18,174.50	\$0.00	\$18,174.50	\$4,360.06	\$13,814.44
2f.1	Community Transition Services - Direct Family Services to Transition from Residential to Community	\$0.2399	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2g.	Special Education Private Day Placement	\$0.4797	\$8,465.70	\$0.00	\$8,465.70	\$4,061.00	\$4,404.70
2h.	Wrap-Around Services for Students With Disabilities	\$0.4797	\$13,313.50	\$0.00	\$13,313.50	\$6,386.49	\$6,927.01
2i.	Psychiatric Hospitals/Crisis Stabilization Units	\$0.4797	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3.	Non-Mandated Services/Community-Based	\$0.2399	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4.	GRAND TOTALS: (Sum of categories 1 through 3)		\$58,238.34	\$0.00	\$58,238.34	\$23,927.01	\$34,311.33

CSA FY 24 - POOL REIMBURSEMENT REQUEST REPORT—PART 2

PART 2 - EXPENDITURE REFUND DESCRIPTION

Information regarding total expenditure refunds reported in Part 1, Line 4(c).

EXPENDITURE REFUND DESCRIPTION	CODE	AMOUNT
Vendor Refunds and Payment Cancellations	010	\$0.00
Parental Co-Payments	020	\$0.00
Payments made on behalf of the child (ex: SSA, SSI, VA benefits, &##133;)	030	\$0.00

Child Support Collections through DCSE	040	\$0.00
Pool prior-reported expenditures re-claimed under IV-E	050	\$0.00
Other: #getforminfo.COMMENTS#	090	\$0.00
TOTAL REFUNDS : Note: This total must agree with the GRAND TOTAL of all expenditure refunds Part 1, Line 4, Col (c).		\$0.00

The expenditures and refunds reported herein were incurred in accordance with provisions of the Comprehensive Services Act, and have not been reported on a previous claim. Documentation is maintained to support the expenditure and refund amounts reported, and to demonstrate that each expenditure and refund was made on behalf of a specific child (or list of specific children) and complies with the CSA Manual, COV and Appropriation Act requirements including utilization management and FAPT criteria.



Children's Services Act
Clarke County, Virginia

Clarke County CSA Fiscal Year 2024 Report August 2024

1. FY24 Base Allocation + Supplemental Total: \$789,295.00
-FY24 Base Allocation Actual Expenditures to Date: \$508,041.00
Total FY24 Unused Base Allocation as of 08/19/2024: \$261,552.00

2. FY24 Base Allocation Actual Expenditures to Date: \$508,041.00
+Final FY24 Invoices To Be Paid: \$1408.09
Total FY24 Base Allocation Expenditures: \$509,449.09

3. FY24 Base Allocation + Supplemental Total: \$789,295.00
-Total FY24 Base Allocation Expenditures: \$509,449.09
Total FY24 Unused Base Allocation: \$279,845.91

4. FY24 WRAP Allocation: \$43,713.00
+FY24 WRAP Supplemental Request: \$1,552.00
FY24 WRAP Total: \$45,265.00

5. FY24 WRAP Total: \$45,265.00
-FY24 WRAP Actual Expenditures to Date: \$45,165.00
Total WRAP Allocation Unused FY24: \$100

FY24 Base Allocation Funding Utilization Rate based on Invoices: 64.5%

FY24 WRAP Allocation Funding Utilization Rate based on Invoices: 99.7%

FY24 Base Allocation Service Utilization Rate based on Encumbrances and Invoices: 73.9%

FY24 WRAP Allocation Service Utilization Rate based on Encumbrances and Invoices: 46.6%



Children's Services Act
Clarke County, Virginia

Clarke County CSA Fiscal Year 2025 Report August 2024

Base Allocation Encumbrances

1. OCS Base Pool Allocation: \$368,539.00
+ OCS WRAP Allocation: \$64,805.00
Total OCS Allocation: \$433,344.00

2. Total Base Encumbrances to date as of 08/19/2024: \$221,599.81
+Total WRAP Encumbrances to date as of 08/19/2024: \$81,017.00
Total Encumbrances to date as of 08/19/2024: \$302,616.81

3. Total OCS Allocation: \$433,344.00
-Total Encumbrances to date: \$302,616.81
Total Unencumbered to date: \$130,727.19

4. Clarke County CSA FY25 Budget: \$210,867.00
Local Match Rate: 47.97%
Clarke County FY25 Budget Estimated Total: \$439,580.98

5. Clarke County FY25 Budget Estimated Total: \$439,580.98
-OCS FY25 Total Allocation: \$433,344.00
Difference: \$6,236.98

6. OCS FY25 WRAP Allocation: \$64,805.00
-Total WRAP Encumbrances to date: \$81,017.00
Total WRAP Left: -\$16,212.00

Children's Services Act
Clarke County, Virginia

Actual Base Allocation Expenditures to Date

1. Base Allocation Encumbrances for the Service Month of July: \$56,530.70
-Base Allocation Invoices as of 08/19/2024: \$40,177.70
July Unused as of 08/19/2024: \$16,353.00

2. July Unused as of 08/19/2024: \$16,353.00
-Encumbered but not invoiced as of 08/19/2024: \$13,225.00
July Unused by Invoices as of 08/19/2024: \$3,128.00

3. Base Allocation Encumbrances for the Service Month of July: \$56,530.70
-Encumbered but not invoiced as of 08/19/2024: \$13,225.00
July Encumbered and Invoiced as of 08/19/2024: \$43,305.70

To Date July Base Allocation Utilization Rate: **92.7%**

4. Total Base Encumbrances to Date: \$221,599.81
+ Base Allocation Funding Requests in Closed Session: \$52,552.00
Total Base Encumbrances after Closed Session: \$274,151.81

5. OCS Base Allocation: \$368,539.00
-Total Base Encumbrances after Closed Session: \$274,151.81
Total Base Allocation after Closed Session: \$94,387.19

Actual WRAP Expenditures to Date:

(Note: at this time, all case managers have been notified that the WRAP allocation encumbrances have gone over budget, and that until more invoices have been processed and funds freed up, all WRAP requests must either be found eligible under a second mandate or could potentially not receive funding)

1. WRAP Allocation Encumbrances for the Service Month of July: \$34,306.00
-WRAP Invoices as of 08/19/2024: \$16,527.50
WRAP Unused for Service Month of July: \$17,778.50

2. OCS FY25 WRAP Allocation: \$64,805.00
-Total WRAP Encumbrances to date: \$81,017.00
Total WRAP Left: -\$16,212.00

3. Total WRAP Left: -\$16,212.00
-WRAP funding requests in closed session: \$22,929.00
Total WRAP after closed session encumbrances: -\$39,141.00

July WRAP Utilization Rate: **48.2%**

4. OCS FY25 WRAP Allocation: \$64,805.00
-July WRAP Invoices: \$16,527.50
Total WRAP Left after Actual Expenditures to date: \$48,277.50

5. Amount WRAP will be overbudget after closed session encumbrances: \$39,141.00
+OCS FY25 WRAP Allocation: \$64,805.00
Total WRAP encumbrances after closed session: \$103,946.00

6. Total WRAP encumbrances after closed session: \$103,946.00
x July WRAP utilization rate: 48.2%
Estimated WRAP Actual Expenditures through November: \$50,101.98



Children's Services Act
Clarke County, Virginia

Purchase Orders to Be Unencumbered

PO #2538413 (Base): \$3000

PO #2538397 (WRAP): \$1100.50

PO #2538437 (WRAP): \$1739.50

PO #2538421 (WRAP): \$8921.25

1. Total Base Encumbrances after Closed Session: \$274,151.81
-Base PO To Be Unencumbered: \$3000.00
Total Base Encumbrances Balance after Closed Session: \$271,151.81

2. Total WRAP Encumbrances after Closed Session: **-\$39,141.00**
-WRAP POs to be Unencumbered: \$11,760.75
Total WRAP Encumbrances Balance after Closed Session: -\$27,380.25

Base Allocation Projections FY25

1. FY25 Encumbrances to Date (encumbering roughly Jul-Oct—1 third): \$221,599.81
x 3 thirds (Jul-Oct, Nov-Feb, Mar-Jun): 3
FY25 Projected Encumbrances: \$664,799.43

2. FY25 Encumbrances to Date: (encumbering roughly Jul-Oct—1 third): \$221,599.81
+ Closed Session Requests: \$52,552.00
FY25 Expected Encumbrances with closed session requests (encumbering roughly Jul-Nov): \$274,151.81

3. OCS Base Allocation: \$368,539.00
-FY25 Expected Encumbrances: \$274,151.81
FY25 Leftover: \$94,387.19

4. FY25 Projected Encumbrances: \$664,799.43
x FY25 July Base Allocation Invoice Utilization Rate: 92.7%
FY25 Base Allocation Projected Expenditures from Encumbrances: \$616,269.07

5. FY25 Actual Expenditures for Service Month of July: \$40,177.70
x 12 months: 12
FY25 Base Allocation Projected Expenditures from July Invoices: \$482,132.40

6. FY25 Base Allocation Projected Expenditures from Encumbrances: \$616,269.07
-OCS FY25 Base Allocation: \$368,539.00
Projected FY25 Base Supplement from Encumbrances: \$247,730.07

7. FY25 Base Allocation Projected Expenditures from Invoices: \$482,132.40
-OCS FY25 Base Allocation: \$368,539.00
Projected FY25 Base Supplement from Invoices: \$113,593.40

WRAP Allocation Projections FY25

(Note: at this time, all case managers have been notified that the WRAP allocation encumbrances have gone over budget, and that until more invoices have been processed and funds freed up, all WRAP requests must either be found eligible under a second mandate or could potentially not receive funding)

1. FY25 Encumbrances to Date (encumbering roughly Jul-Oct—1 third): \$81,017.00
x 3 thirds (Jul-Oct, Nov-Feb, Mar-Jun): 3
FY25 Projected Encumbrances: \$243,051.00

2. FY25 Projected Encumbrances: \$243,051.00
x FY25 WRAP Allocation July Utilization Rate: 48.2%
FY25 WRAP Projected Expenditures from Encumbrances: \$117,150.58

3. FY25 Actual Expenditures for the Service Month of July: \$16,527.50
x 12 months: 12
FY25 WRAP Projected Expenditures from July Invoices: \$198,330.00

4. FY25 WRAP Projected Expenditures from Encumbrances: \$117,150.58
-OCS FY25 WRAP Allocation: \$64,805.00
Projected FY25 WRAP Supplemental from Encumbrances: \$52,345.58

5. FY25 WRAP Projected Expenditures from Invoices: \$198,330.00
-OCS FY25 WRAP Allocation: \$64,805.00
Projected FY25 WRAP Supplemental from Invoices: \$144,525.00

[Click here for Dashboard Instruction Manual](#)

[Click here for Dashboard Codes](#)

Finance

Demographics/Utilization

Outcome Measures

Location

Clarke County

Statewide data updated through **08/15**
of current Program Year

At-A-Glance

	2020	2021	2022	2023	2024
Distinct Child Count	19	12	14	27	27
Net Expenditures	\$0.2M	\$0.1M	\$0.3M	\$0.5M	\$0.6M
Local Net Match	\$0.1M	\$0.0M	\$0.1M	\$0.2M	\$0.2M
Average Expenditure	\$11,438	\$8,778	\$19,021	\$18,032	\$20,385
Base Match Rate	0.4797	0.4797	0.4797	0.4797	0.4797
Effective Match Rate	0.4107	0.3984	0.4064	0.3891	0.3860

CQI dashboard data consist of information submitted by individual Virginia localities for youth receiving CSA-funded services in the reporting period.

Data is updated through 7/10/24

Clarke County

Mandate Type

Service Placement Type

Service Name

Expenditure Code

Fiscal Year

2024

Total Average Length of Stay:

Select a Service Placement Type Group to adjust the placement types displayed:

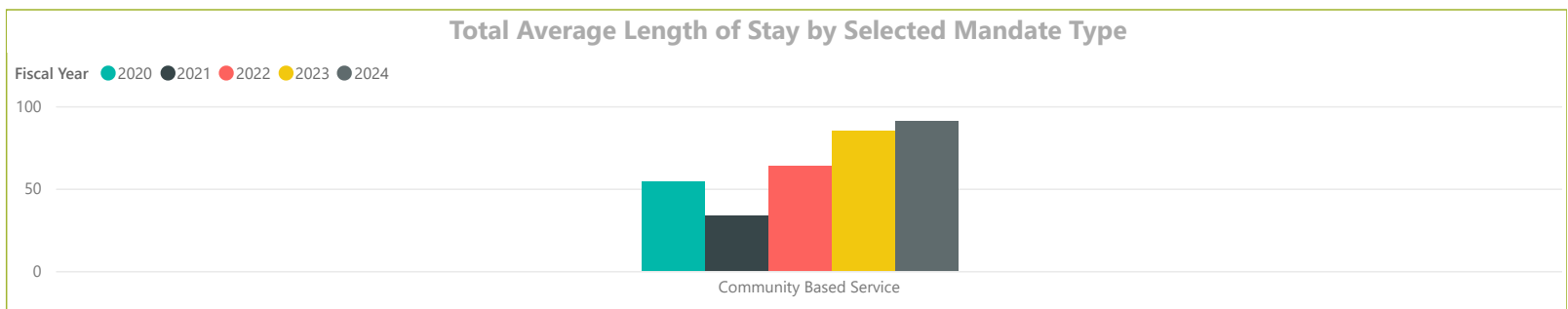
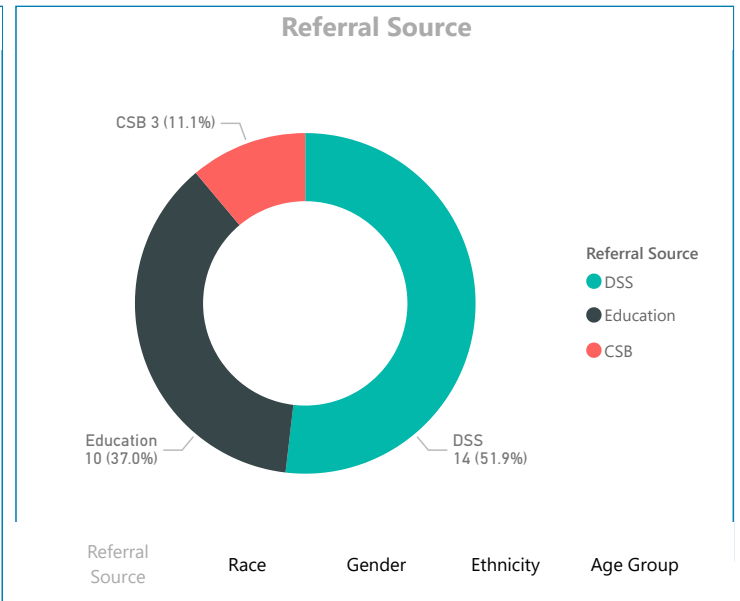
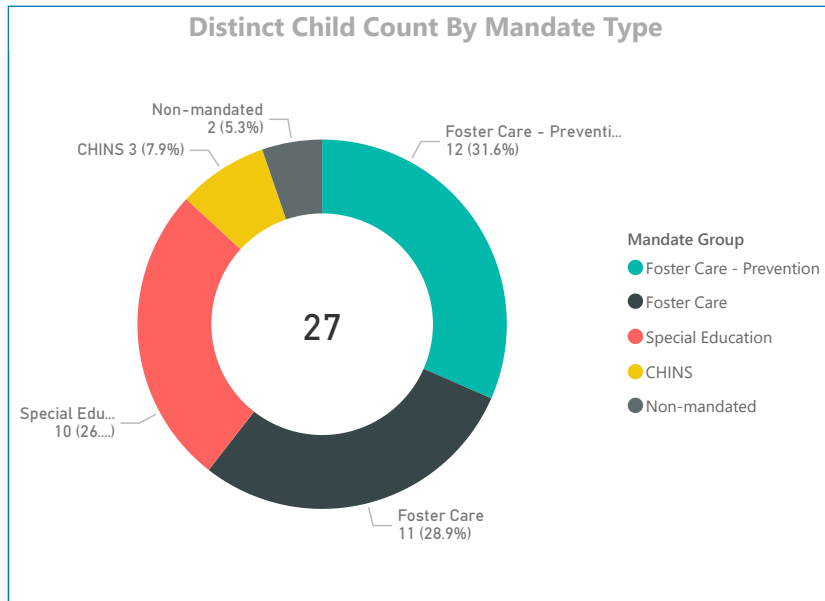
Service Placement Type Group

Community-Based

Select a Primary Mandate Type to filter length of stay results by SPT:

Primary Mandate Type

Foster Care Abuse/Neglect - Pr...



What percentage of youth, starting services between FY2019 and FY2023, saw a change from their Initial CANS scores?
 How did proportions change, as time increased between assessments?

CANS

Foster Care

CSA

Location

Clarke County

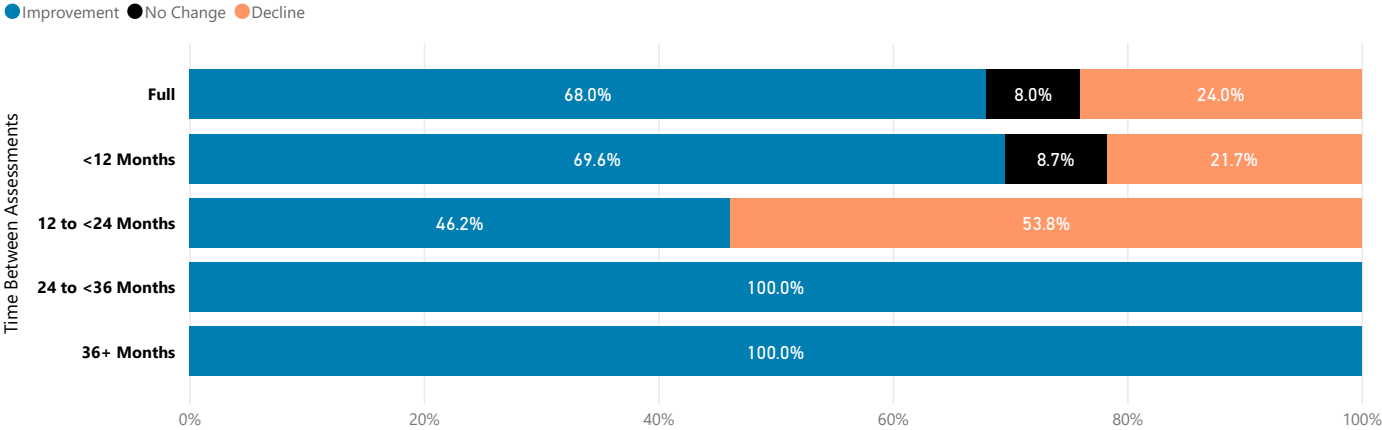
Data updated 07/19/2024

Select one service placement group below to filter results for youth receiving specific services during the period:

- Community-Based
- Foster Care/Independent Living
- Residential
- Special Education/WRAP

Behavioral/Emotional Needs Child Strengths School

Behavioral/Emotional Needs



How does your locality's performance compare to statewide percentages?

	Improvement		No Change		Decline	
	State	Locality	State	Locality	State	Locality
Full	44.6%	68.0%	20.8%	8.0%	34.6%	24.0%
<12 Months	41.4%	69.6%	24.3%	8.7%	34.3%	21.7%
12 to <24 Months	47.7%	46.2%	15.0%		37.3%	53.8%
24 to <36 Months	48.7%	100.0%	12.6%		38.7%	
36+ Months	50.5%	100.0%	11.1%		38.3%	