

# FREDERICK COUNTY CPMT AGENDA

June 26, 2022  
1:00 PM  
107 N Kent St  
Winchester, VA  
1<sup>st</sup> Floor Conference Room

## Agenda

- I. Introductions
- II. Adoption of Agenda
- III. Consent Agenda Jackie Jury
  - A. May Minutes
  - B. Budget Request Forms
- IV. Executive Session
  - A. Pending
- V. Committee Member Announcements
- VI. CSA Office Update Jackie Jury
  - A. May Financial Report
  - B. CSA Staff Updates
  - C. Committee Vacancy Recruitment
  - D. Task Follow Up
    1. Web Notification of form changes
    2. Program Improvement/Retreat Planning Update
- VII. Old Business Jackie Jury
  - A. Audit Discussion/Quality Improvement Plan Update
    1. Training Policy
    2. Parental Contribution
  - B. CSA Eligibility Discussion
  - C. Legislative Updates
- VIII. New Business Jackie Jury
  - A. EAS Contract Discussion
  - B. FY24 Annual Risk Assessment
  - C. Discussion of Appropriate Act Medicaid requirement
- IX. Informational Items Jackie Jury
  - A. New EBPs approved through FFPSA
- X. Assigned Tasks
- XI. Next CPMT Meeting
  - July 24, 2023, 1:00-3:00pm, 1<sup>st</sup> Floor Conference Room
- XII. Adjourn

**\*\*Instructions for Closed Session:**

- 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 for 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 the Child & Family Team Meeting process, and whose case is being assessed by this team or reviewed by the Community Management and Policy Team
- Motion to return to open session-
- Motion that the Frederick County CPMT certify that to the best of each member's knowledge, (1) only public business matters lawfully exempted from open meeting requirements, and (2) only such public

business matters were identified in the motion by which the closed meeting was convened were heard, discussed, or considered in the closed meeting.

- Roll Call Affirmation
- Motion to Approve cases discussed in Executive Session

**CPMT Meeting Minutes: Monday, May 22, 2023**

The Community Policy and Management Team (CPMT) met in the 1<sup>st</sup> Floor Conference Room at 107 N Kent St, Winchester, VA 22601, on May 22, 2023, at 1:00 pm.

***The following members were present:***

- Jay Tibbs, Frederick County Administration
- David Alley, Private Provider Representative, Grafton Integrated Health Network
- Leea Shirley, Lord Fairfax Health District
- Tamara Green, Frederick County Department of Social Services
- Dr. Michele Sandy, Frederick County Public Schools
- Denise Acker, Northwestern Community Services Board

***The following members were not present:***

- Jerry Stollings, 26<sup>th</sup> District Juvenile Court Service Unit

***The following non-members were present:***

- Jacquelynn Jury, CSA Coordinator
- Katherine Webster, UR/CQI Specialist

***Call to Order:*** Denise Acker called the meeting to order at 1:12 pm.

- I. Introductions- Katherine Webster, new hire into the UR/CQI Specialist position
- II. Adoption of Agenda- Leea Shirley made a motion to adopt the May agenda; David Alley seconded; CPMT approved.
- III. Consent Agenda- The following items were included in the Consent Agenda for CPMT's approval:
  - A. April 24, 2023- CPMT Minutes, David Alley made a motion to approve the minutes, Dr. Michele Sandy seconded, CPMT approved.
  - B. Budget Request Forms- Confidential Under HIPAA. Dr. Michele Sandy made a motion to accept the Budget Request Forms, Tamara Green seconded, CPMT approved.
- IV. Executive Session

Adoption to Convene to Executive Session- On a motion duly made by Tamara Green seconded by David Alley, the CPMT voted unanimously voted to go into Closed Executive Session to discuss cases confidential by law as permitted by Section §2.2-3711 (A) (4) and (15) and in accordance with the provisions of 2.2-5210 of the Code of Virginia.

  - Eligibility Determination- Due to recent discussions regarding the interpretation of CHINS-Services, Jacquelynn Jury provided the team with the summary of a case where CHINS Eligibility came into question. In considering the definition, "serious threat to the well-being and physical safety of the child", the team concluded that the identified child meets criteria for the CHINS-Services. Further discussion about how to interpret the CHINS definition was tabled until open session.

Adoption of Motion to Come Out of Executive Session- Leea Shirley made a motion to come out of Closed Session and reconvene in Open Session; CPMT approved by unanimous consent.

Motion and Roll Call Certification of Executive Session- Tamara Green made a motion to Certify to the best of each Frederick County CPMT member's knowledge (1) the only public business matters lawfully exempted from open meeting requirements and (2) only such public business

matters were identified in the motion by which the closed meeting was convened were heard, discussed, or considered in the closed meeting, David Alley seconded; CPMT approved.

- Michele Sandy           Aye
- Tamara Green           Aye
- Jay Tibbs                Abstain
- Denise Acker            Aye
- David Alley             Aye
- Leea Shirley            Aye

Adoption of Motion to Approve Items Discussed in Executive Session- Leea Shirley made a motion to approve the CHINS services eligibility of the case discussed in executive session, David Alley seconded, Jay Tibbs abstained; CPMT approved.

V. Committee Member Announcements

- A. Leea Shirley reported that the job posting for the Health Director position closes today, May22, 2023.
- B. Denise Acker reported that Katrina McClure has accepted the Executive Director vacancy and will begin July 1, 2023.
- C. Dr. Michele Sandy noted that new social work positions have been added to the FCPS budget. As the positions are filled, she will report back to the team as to how they might interact with the CSA process.

VI. CSA Office Business

A. CSA Financial Report

1. April 2023 Financial Report

- a) Monthly Net Expenditures- \$344,674.69 or 10% of the allocation, including Protected and SpEd WrapAround Funds.
- b) Year to Date Net Expenditures- \$2,834,506.81 or 69% of the allocation, including Protected and SpEd WrapAround Funds, of which \$1,083,030.92 is the local portion.
- c) Remaining funds without Wrap- \$730,404.49 of the total allocation.
- d) Protected Funds- \$20,737.00 spent, \$22,720,00 remaining, with \$4,010.00 funds currently encumbered.
- e) SpEd Wrap Funds- \$56,093.30 spent, \$43,906.69 remaining, with \$21,295.00 funds encumbered.
- f) Youth Served: 132 youths.
  - (1) 87 in Community Based Services
  - (2) 26 in TFC
  - (3) 19 in Congregate Care
  - (4) 19 in Private Day School
- g) Jacquelynn Jury noted that there is some confusion among case managers about the availability of non-mandated funding. After a team discussion, it was recommended by CPMT that all possible cases, regardless of case management agency, should be brought to FAPT to determine the availability of funding and which eligibility category could be utilized.
- h) Jacquelynn Jury reported that the quantity of services requested by case managers is often underutilized and therefore over-encumbered. This provides budget inaccuracies which impact a family's ability to access CSA services. She suggested that having more direct conversations in FAPT and

Child & Family Team Meetings about realistic levels of engagement would help alleviate over-encumbrances. The extent of these conversations occurring in CFTMs is unknown.

- B. CSA Staff changes
    - 1. UR/CQI Specialist Vacancy- Katherine Webster started on Monday, April 17, 2023. Katherine Webster is familiar with Thomas Brothers software system and can assist with supporting the duties of that position until the vacancy is filled.
    - 2. There are 2 interviews scheduled the week of May 29th for the open Account Specialist position.
  - C. Committee Vacancy Recruitment- Allison Dillow, the Parent Representative for FAPT started attending meetings on 5/16/23. The intent is to have Allison Dillow communicate with families prior to each FAPT meeting to increase family engagement during FAPT meetings.
- VII. Old Business
- A. Audit Discussion/Quality Improvement Plan Update
    - 1. Item #1 CANS- The date of completion for training is still on target for June. Jacquelynn Jury presented the team with a broad policy statement about the training plan. There is currently language about training for FAPT members and case managers, and training for CPMT members will be added. David Alley noted that some of the items noted on the satisfaction survey could be addressed by this training policy. Dr. Michele Sandy identified item #6 (non-compliance) as potentially challenging to execute, given that the CSA office cannot provide disciplinary or corrective action. After a team discussion, it was determined that the language for corrective action in the CPMT Policy and Procedure Manual should be refined, so that the training policy can reference it. Tamara noted that the language about reviewing the training policy should be specific, Jacquelynn Jury suggested that the review frequency should align with the CSA Policy and Procedure Manual, or earlier if deemed necessary.
    - 2. Item # 3 Copayment- During the audit, it was determined that FC's copayment procedures resulted in inaccurate financial reporting to OCS. Jacquelynn Jury offered options for the CPMT to consider which will address the quickly approaching target completion date of the development of a new copayment policy and process. The plan to purchase Kinship software for the CSA Office, which would resolve the audit finding, was temporarily halted due to issues recently identified. CPMT discussed the options of extending the completion date or implementing a short-term fix that will provide accurate financial data to OCS. Jacquelynn Jury noted that Hanover CSA has a process through Thomas Brothers, FC CSA's current software system, that will meet the reporting requirements. CPMT agreed that although the procedure through Thomas Brothers is less efficient, it is in the best interest of the county to resolve the issue in the short term while continuing to pursue alternative software options.
  - B. CSA Program Improvement Update- David Alley provided CPMT with a summary of the focus groups responses. After reviewing the first two points, Tamara Green proposed a separate meeting to focus on the feedback, as time constraints of the regularly scheduled CPMT meetings would be a barrier. Jacquelynn Jury will send out a poll to CPMT members to determine a date and time in July, CPMT approved.
  - C. CSA Eligibility Discussion- tabled until June.
  - D. Legislative Updates
    - 1. The repeal of legislation requiring the implementation of a rate structure for private day schools is contained within the budget amendment, which has not yet been passed.

- VIII. New Business
- A. Salveo Consulting provided the CSA office with an updated rate sheet which includes a new service: Violence Risk Assessment for significantly cheaper than the other contracted provider. Leea Shirley made a motion to approve the new service through Salveo Consulting, David Alley seconded, CPMT approves.
- IX. Informational Items- None
- X. Assigned Tasks
- A. Jacquelynn Jury will consult with Frederick County IT to determine if a notification can be sent to all registered case managers.
- B. Jacquelynn Jury will poll CPMT members for availability to participate in a retreat to review the focus group results.
- C. Jacquelynn Jury will continue to work on the copayment and training policies.
- XI. Next CPMT Meeting
- June 26, 2023, 1:00-3:00pm, 1<sup>st</sup> Floor Conference Room
- XII. Adjourn: Tamara Green made a motion to adjourn the meeting, David Alley seconded, CPMT agreed.

Minutes Completed By: Katherine Webster



# Frederick County CSA Financial Update: May 2023

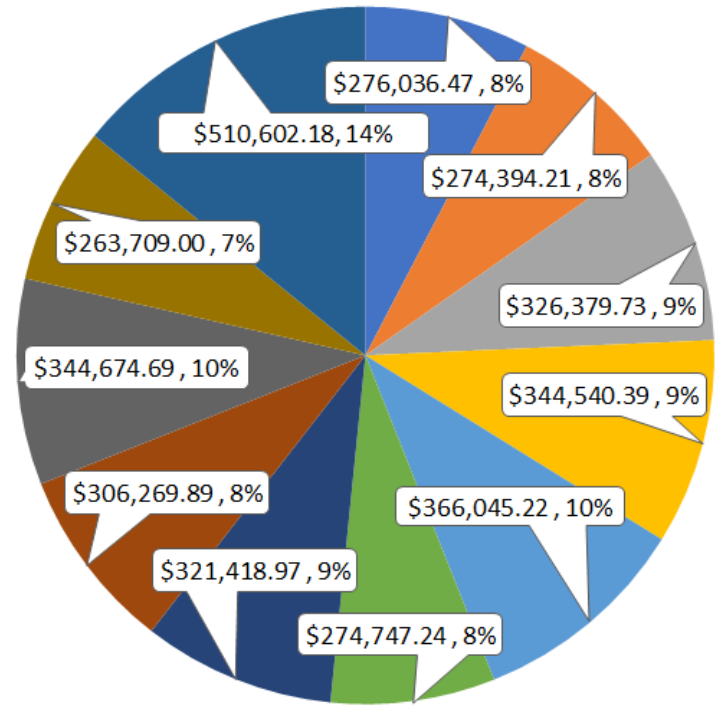
# of Reports Submitted: 10

YTD Total Net Expenditures:  
\$3,098,215.81- 86%

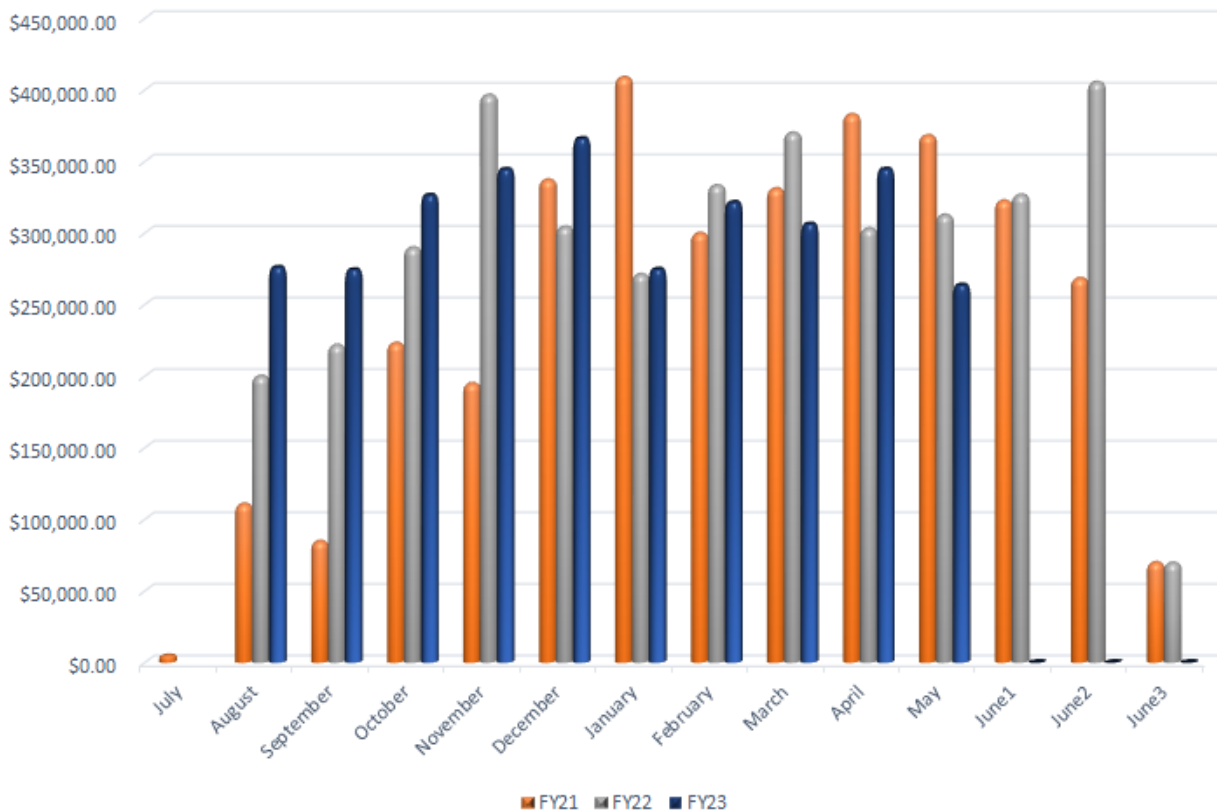
YTD Local Net Expenditures:  
\$1,185,109.61

Remaining without Wrap: \$474,684.49

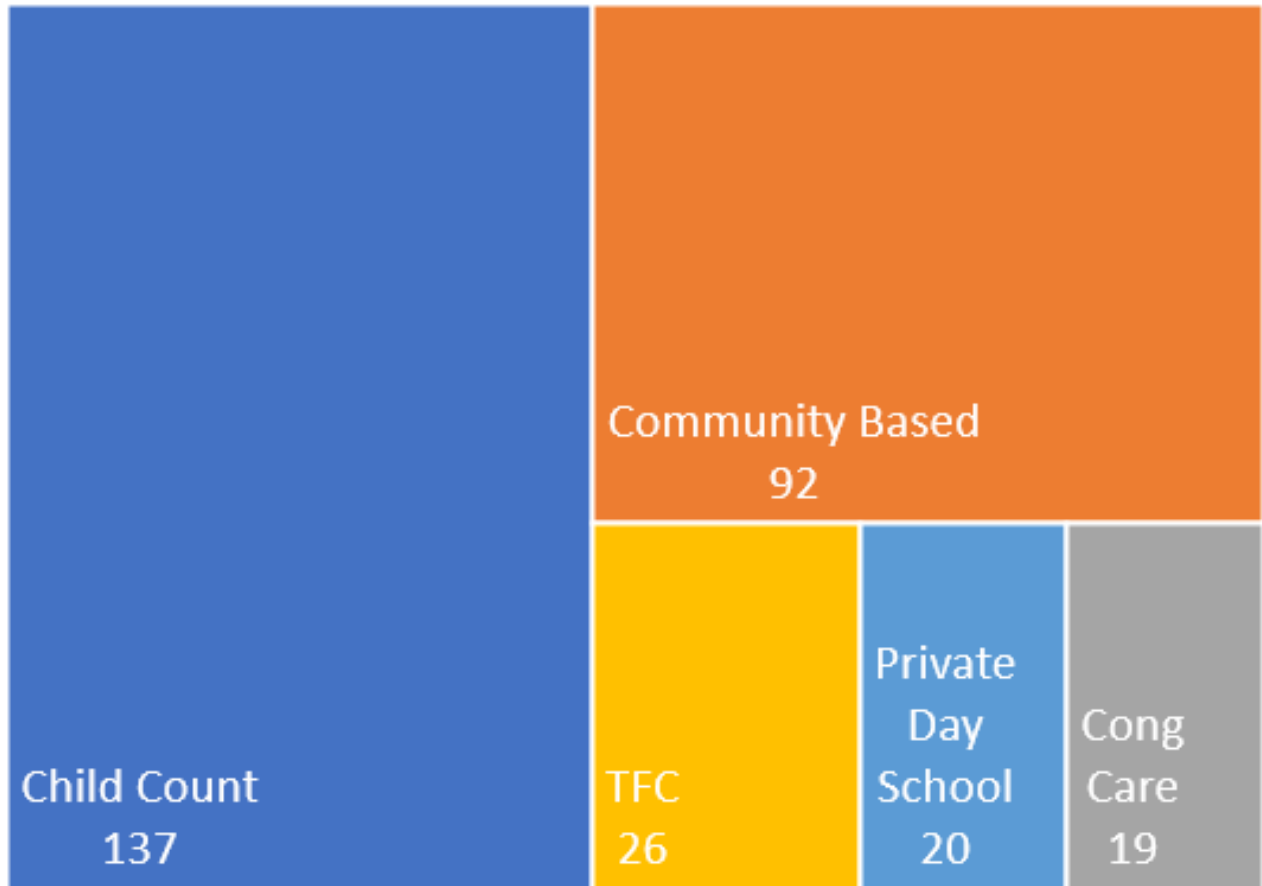
Monthly Expenditure



Monthly Net Expenditures



# Placement Environment



Unduplicated: Child Count, Congregate Care, Therapeutic Foster Care, Community Based Services

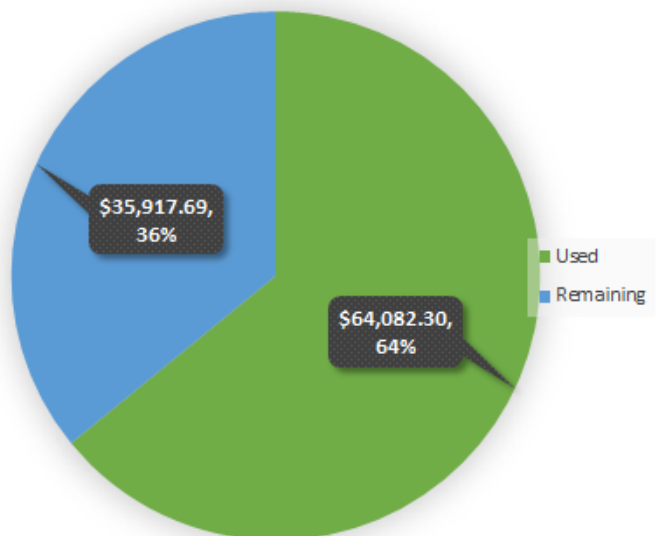
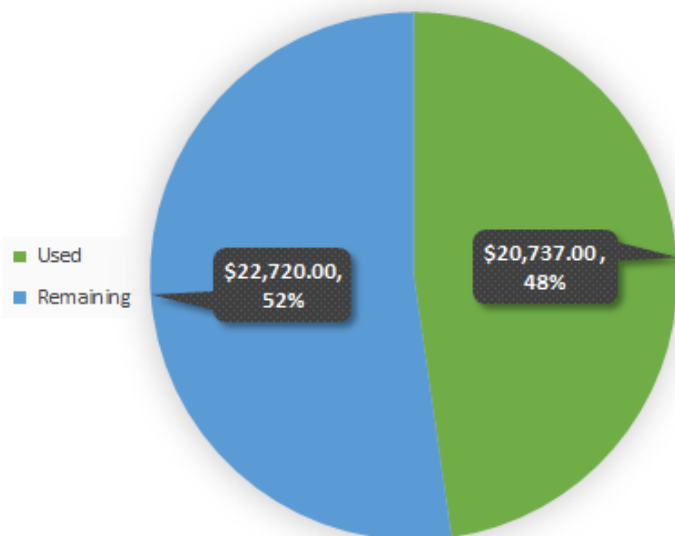
\*Possible duplication of Private Day School students with youth in Congregate Care

Protected Encumbered  
\$2,690.00

SpEd Wrap Encumbered  
\$8,545.00

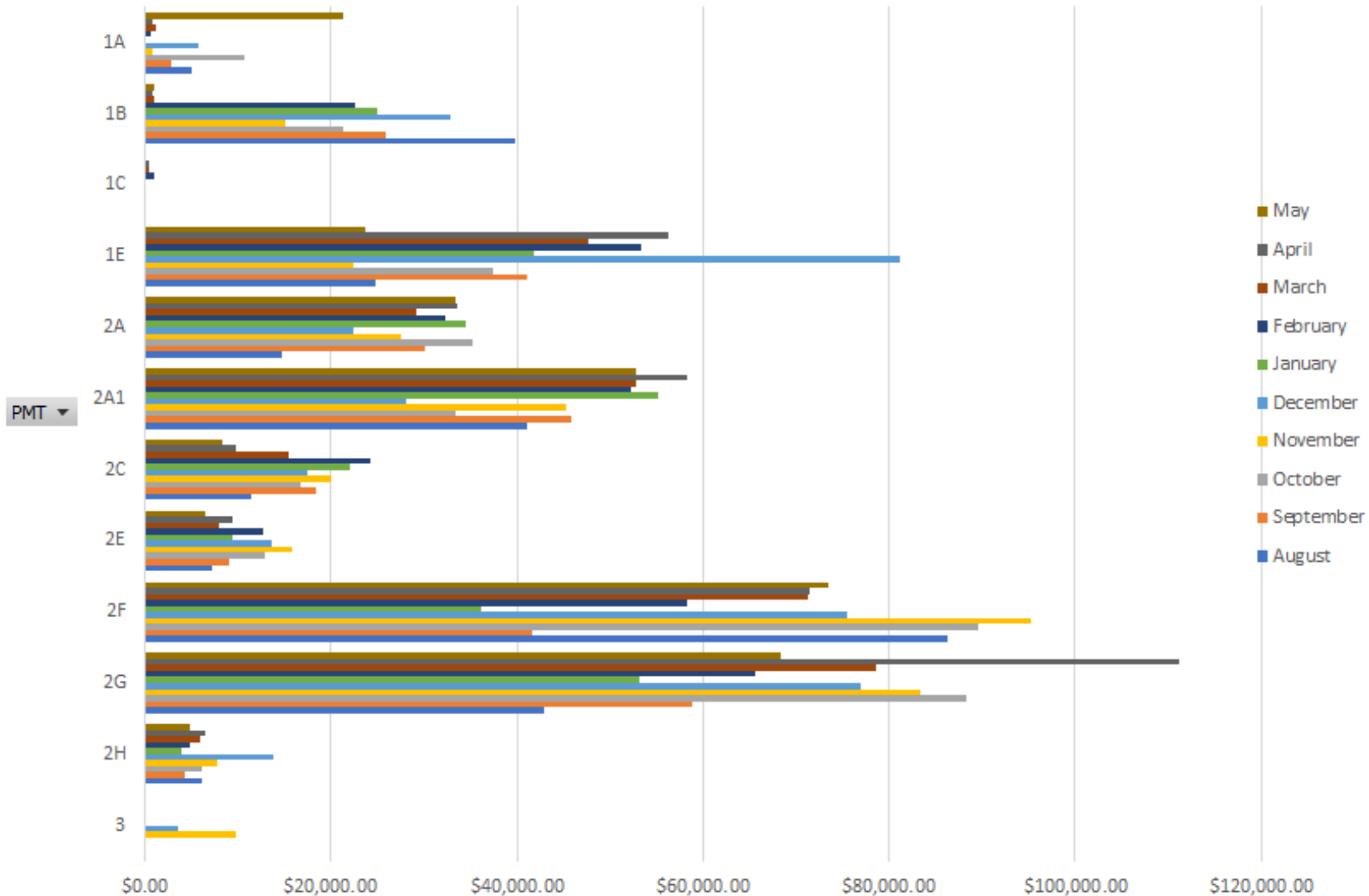
Protected Funds

SpEd Wrap





# Primary Mandate Type Expenditures by Month



**Primary Mandate Types (PMT):**

1A- IV-E Congregate Care

1B- Non IV-E Congregate Care

1C- Parental Agreement Congregate Care

\*PMTs from 1A-1C do not include Daily Education payment of congregate care placements

1E- Residential Education

\*Includes all services for RTC IEP and Education only for all other RTC placements

2A- IV-E Treatment Foster Home

2A1- Non IV-E Treatment Foster Home

2A2- Parental Agreement Treatment Foster Home

2C- IV-E Community Based Services

\*Only for youth placed in CFW Foster Homes

2E- Maintenance and Other Services

\*Only Basic Maintenance and Daycare for youth in Foster Care

2F- Non IV-E Community Based Services

\*Includes Daycare for youth not in Foster Care or IV-E CBS for youth placed in TFC or Cong Care

2G- Private Day School

2H- Special Education Wrap Around Services

3- Protected Funds

\*NonMandated

## CPMT Training Policy

Effective Date: July 1, 2023

### Policy Statement:

The Frederick County Community Policy and Management Team (CPMT) recognizes the importance of effectively communicating the requirements of the Children's Services Act (CSA) to identified stakeholder groups and child serving agencies, herein referred to collectively as the "trainee"). This policy establishes the guidelines for communication to ensure that these individuals are informed and compliant with CSA regulations, guidelines, and policies.

### 1) Policy Objectives:

- a) To ensure that trainees have a clear understanding of the requirements set forth by the Children's Services Act (CSA) and its related policies.
- b) To facilitate compliance with CSA regulations and guidelines in the provision of services to children, youth, and families.
- c) To promote consistent and accurate communication of CSA requirements to trainees.

### 2) Communication Responsibilities:

#### a) CPMT:

- i) The CPMT shall be responsible for developing and disseminating information regarding CSA requirements to trainees.
- ii) CPMT members shall ensure all appropriate staff from their respective agencies participate in mandated CSA training.
- iii) CPMT shall ensure that the communication is clear, comprehensive, and up to date.
- iv) CPMT shall establish mechanisms to address questions, concerns, and provide ongoing support related to CSA requirements.

#### b) Individual Trainees:

- i) Trainees shall actively seek and engage with the communicated CSA requirements.
- ii) Trainees shall comply with the communicated CSA requirements and adhere to established procedures and protocols.

### 3) Communication Methods:

#### a) Written Communication:

- i) CPMT shall provide written materials such as policy manuals, handbooks, guidelines, and memos to communicate CSA requirements.
- ii) Written materials shall be accessible, concise, and organized to facilitate understanding and compliance.

#### b) Training and Workshops:

- i) CPMT shall conduct training sessions and workshops to educate trainees on CSA requirements.
- ii) Training sessions and workshops may include presentations, group discussions, case studies, and interactive activities.
- iii) Training topics shall include but are not limited to CSA New Case Manager Orientation, CSA Policy & Procedures, CSA Eligibility, CANS, FAPT Roles and Responsibilities, CPMT Roles and Responsibilities.

- c) Digital Communication:
  - i) CPMT shall utilize digital platforms such as email, intranet, or other electronic means to distribute CSA requirement updates, reminders, and clarifications.
  - ii) Digital communication shall be timely, reliable, and easily accessible to all relevant stakeholders.
- 4) Communication Content:
  - a) CSA Policies and Procedures:
    - i) Trainees shall be provided with comprehensive information on CSA policies and procedures.
    - ii) Communication shall include information on eligibility criteria, service planning, documentation requirements, reporting, and any updates or changes to policies and procedures.
  - b) Case-Specific Requirements:
    - i) Trainees shall receive communication regarding case-specific CSA requirements for the children, youth, and families they serve.
    - ii) Communication shall address specific service needs, treatment goals, service provider expectations, and any other pertinent information.
  - c) Timelines and Deadlines:
    - i) Communication shall include clear timelines and deadlines for trainees to complete required tasks and submit documentation in compliance with CSA requirements.
    - ii) Timelines and deadlines shall be reasonable, feasible, and supportive of effective service delivery.
- 5) Documentation and Recordkeeping:
  - a) CPMT shall maintain accurate and up-to-date records of all communication distributed to trainees regarding CSA requirements.
  - b) Records shall include the date, content, and recipients of the communication, as well as any acknowledgments or confirmations of receipt.
- 6) Non-Compliance:
  - a) Non-compliance with this policy may result in corrective actions, including but not limited to verbal/written warnings, retraining, or other appropriate measures, in accordance with CPMT's policies and procedures.
- 7) Policy Review

This policy shall be reviewed in accordance with the established frequency of the Frederick County CSA Policy and Procedure Manual to ensure its effectiveness and compliance with changes in CSA regulations and guidelines. Any updates or amendments to this policy shall be communicated to relevant stakeholders in a timely manner.

## CPMT Training Policy

Effective Date: July 1, 2023

### Policy Statement:

The Frederick County Community Policy and Management Team (CPMT) recognizes the importance of effectively communicating the requirements of the Children's Services Act (CSA) to ~~case managers and Family Assessment and Planning Team (FAPT) members~~ identified stakeholder groups and child serving agencies, herein referred to collectively as the "trainee". This policy establishes the guidelines for communication to ensure that ~~case managers and FAPT members~~ these individuals are informed and compliant with CSA regulations, guidelines, and policies.

### 1) Policy Objectives:

- a) To ensure that ~~case managers and FAPT member~~ trainees have a clear understanding of the requirements set forth by the Children's Services Act (CSA) and its related policies.
- b) To facilitate compliance with CSA regulations and guidelines in the provision of services to children, youth, and families.
- c) To promote consistent and accurate communication of CSA requirements to ~~case managers and FAPT member~~ trainees.

### 2) Communication Responsibilities:

#### a) CPMT:

- i) The CPMT shall be responsible for developing and disseminating information regarding CSA requirements to ~~case managers and FAPT member~~ trainees.
- ii) CPMT members shall ensure all appropriate staff from their respective agencies participate in mandated CSA training.
- iii) CPMT shall ensure that the communication is clear, comprehensive, and up-to-date.
- iv) CPMT shall establish mechanisms to address questions, concerns, and provide ongoing support related to CSA requirements.

#### b) Individual ~~Case Managers and FAPT Members~~ Trainees:

- i) ~~Case managers and FAPT members~~ Trainees shall actively seek and engage with the communicated CSA requirements.
- ii) ~~Case managers and FAPT members~~ Trainees shall comply with the communicated CSA requirements and adhere to established procedures and protocols.

### 3) Communication Methods:

#### a) Written Communication:

- i) CPMT shall provide written materials such as policy manuals, handbooks, guidelines, and memos to communicate CSA requirements.
- ii) Written materials shall be accessible, concise, and organized to facilitate understanding and compliance.

#### b) Training and Workshops:

- i) CPMT shall conduct training sessions and workshops to educate ~~case managers and FAPT member~~ trainees on CSA requirements.
- ii) Training sessions and workshops may include presentations, group discussions, case studies, and interactive activities.

iii) Training topics shall include but are not limited to CSA New Case Manager Orientation, CSA Policy & Procedures, CSA Eligibility, CANS, FAPT Roles and Responsibilities, CPMT Roles and Responsibilities.

c) Digital Communication:

- i) CPMT shall utilize digital platforms such as email, intranet, or other electronic means to distribute CSA requirement updates, reminders, and clarifications.
- ii) Digital communication shall be timely, reliable, and easily accessible to all relevant stakeholders.

4) Communication Content:

a) CSA Policies and Procedures:

- i) ~~Case managers and FAPT members~~Trainees shall be provided with comprehensive information on CSA policies and procedures.
- ii) Communication shall include information on eligibility criteria, service planning, documentation requirements, reporting, and any updates or changes to policies and procedures.

b) Case-Specific Requirements:

- i) ~~Case managers and FAPT members~~Trainees shall receive communication regarding case-specific CSA requirements for the children, youth, and families they serve.
- ii) Communication shall address specific service needs, treatment goals, service provider expectations, and any other pertinent information.

c) Timelines and Deadlines:

- i) Communication shall include clear timelines and deadlines for ~~case managers and FAPT member~~trainees to complete required tasks and submit documentation in compliance with CSA requirements.
- ii) Timelines and deadlines shall be reasonable, feasible, and supportive of effective service delivery.

5) Documentation and Recordkeeping:

- a) CPMT shall maintain accurate and up-to-date records of all communication distributed to ~~case managers and FAPT member~~trainees regarding CSA requirements.
- b) Records shall include the date, content, and recipients of the communication, as well as any acknowledgments or confirmations of receipt.

6) Non-Compliance:

- a) Non-compliance with this policy may result in corrective disciplinary actions, including but not limited to verbal/written warnings, retraining, or other appropriate measures, in accordance with CPMT's disciplinary policies and procedures.

- 7) This policy shall be reviewed periodically in accordance with the established frequency of the Frederick County CSA Policy and Procedure Manual to ensure its effectiveness and compliance with changes in CSA regulations and guidelines. Any updates or amendments to this policy shall be communicated to ~~case managers and FAPT members~~relevant stakeholders in a timely manner.

### 3.8 Parental Contribution/Co-payment

The Code of VA §2.2- 5206, requires local CPMTs to assess parents or legal guardians for the ability to contribute financially toward the cost of services provided. Frederick County CPMT believes families have better outcomes when they are invested and fully engaged in the services and supports offered through the Frederick County Children's Services Act. In order to encourage participation and maximize the resources of the community, the CPMT has adopted a policy that requires families to contribute financially toward the provision of services, based on the ability to pay.

#### 3.8.1 Case Manager Responsibility

- The case manager will determine if the child has been screened and/or enrolled in Medicaid, and whether private insurance or other resources are available to meet the child's needs.
- Prior to an initial referral to the case manager shall notify families of the requirement for an assessment of parental contribution upon accessing CSA funded services. The family shall be informed that failure to provide the supporting documentation to the CSA Office during the assessment process will result the delay of services or the suspension of services until such time that the assessment is complete, and the parental contribution agreement is signed.
- Case managers shall list the requirement for parental contribution on family plans when appropriate, i.e., care plans, court orders, protective orders, etc.

#### 3.8.2 Eligible Populations

Youth and families accessing CSA funded services shall be assessed for a parental contribution, unless specifically prohibited by state or federal law or regulations.

The following eligibility categories will be required to undergo an assessment to establish a monthly parental contribution.

- Foster Care Prevention
- Non-Mandated
- Special Education WrapAround Services

Waivers- Parents enrolled in any of the following programs shall be waived from the parental contribution:

- Low Income Home Energy Assistance Program
- Federal Public Housing Assistance or Section 8
- Supplemental Nutrition Assistance Program
- Temporary Assistance for Needy Families (TANF)
- Free or Reduced Meals under the National School Lunch Program
- Parents receiving Social Security Disability as their only source of income
- CSA funding of only Drug Screens or Single Evaluations of \$1000.00 or less.

Exemptions- The following eligibility categories are exempt from being assessed for parental contribution toward services.

- School-based IEP required services are exempt from the CSA Parental Contribution policy. Federal regulation under the Individuals with Disabilities Education Act (IDEA) requires school districts to provide a Free and Appropriate Public Education (FAPE) to students with a disability.
- The parents or legal guardians of youth placed in the custody of DSS and those receiving Foster Care Services through a Parental Agreement are referred to the Division of Child Support Enforcement (DCSE) for the collection of child support, and therefore not assessed a parental contribution toward services.

### 3.8.2 Methodology

Families of children receiving CSA funded services shall be assessed a monthly fee to contribute toward the cost of services based on the sliding fee scale adopted by CPMT.

- Informed parental consent- Parents or legal guardians are informed by the case manager prior to FAPT/MDT that CSA funded services are subject to parental contribution.
- Individual Family Service Plan or Care Plan- the FAPT/MDT service plan shall identify services eligible for parental contribution.
- CSA Office Screening- The family shall be subject to an assessment by the CSA Office representative prior to, or immediately after FAPT/MDT to determine the monthly fee for prescribed services.
  - Upon initial receipt of the Authorization to Use and Exchange Information, the CSA Account Specialist shall complete a DSS Service Inquiry to determine if the parent is eligible for a waiver.
  - The parental contribution shall be assessed prior to the beginning of services. Services shall not commence prior to receiving a signed Copayment Agreement. Or
  - Frederick County CPMT does not believe the assessment for a parental contribution should delay the initiation of CSA funded services. Therefore, authorized services (excluding flat fee or single payment services, i.e., evaluations) may begin during the assessment period. The CSA Office shall complete the assessment and obtain the parent or legal guardian's signature on the required documentation within 30 days of the service start date.

If the CSA Office is unable to obtain the required signatures by the 30<sup>th</sup> day, through no fault of their own, services shall be suspended. The CSA Account Specialist shall direct the case manager and provider to suspend services until otherwise notified by the CSA Office.

- The parental contribution shall be reassessed annually, or in the event of a major change in income, including, but not limited to, change in employment status, household size, enrollment in a waiver eligible program, etc.

### 3.8.3 Amount of Parental Contribution

The parental contribution amount shall be assessed using the annual total gross income of.

### 3.8.4 Appeals

- Families with extenuating financial situations/hardships, such as extraordinary medical expenses, may request a reconsideration by the CSA Coordinator. To be considered, documentation verifying such hardship must be provided. If, after such a review, the family still believes the fee is unjust or inappropriate, an appeal can be made to the CPMT. The parent/guardian must submit in writing a letter of appeal to the CSA Office, providing any additional documentation if desired. The CSA Office will place the appeal on the next regularly scheduled CPMT meeting agenda. The CPMT shall review the materials provided and render a decision, which shall be final. Within 30 days of the review, the CSA Office will notify the family in writing of the decision of the CPMT.
- Frederick County CPMT understands that events that impact a family's financial situation can occur at any time. It is their policy that families can request a reconsideration or appeal of the assessed parental contribution at any time.
- The appeal of an initial parental contribution assessed shall delay service initiation until a signed agreement is obtained.

**Commented [JJ1]:** Procedurally, from the CSA perspective, requiring everyone to complete the assessment prior to services starting would be much cleaner and easier to monitor and track. FC wouldn't be the only locality that has that policy in place. However, I'm concerned how it would impact service delivery where urgency is important and with obtaining services through emergency funding. It may help move the process along, but it could also delay much needed services...

**Commented [JJ2]:** This will be completed based on the team's determination- see Determination of Family Income document.

**Commented [JJ3]:** This would be relevant only if services were allowed to start prior to completion of the assessment.

- The appeal of an ongoing parental contribution shall not disrupt services being received. However, the previously agreed upon amount will continue through the appeal process until a new agreement is signed or services terminate.

#### 3.8.5 Ongoing Processing

- Parental contributions shall be assessed based on monthly invoices received for services rendered. In no event shall the parental contribution be higher than the cost of services for the month being assessed.
- The CSA Office will send relevant parties an invoice for their portion of the cost of services rendered. Notice of payment due shall be sent via email or postal mail within 10 days of the CSA Office receiving a vendor invoice for services rendered.
- Parental contributions exceeding 30 days past due shall generate a Notice of Past Due Payment to the responsible party(s), case manager, and vendor(s). At any time, parents or legal guardians may request a reconsideration or appeal of the assessed amount, providing verification of any changes that have occurred. Information regarding the Frederick County CPMT appeals policy and process shall be included with every Notice of Past Due Payment.
- The CSA Office shall provide 2 Notices of Past Due Payment. If the responsible party(s) does not submit payment in full or commit to a mutually agreed upon alternative arrangement, services shall terminate.



### 3.8 Parental Contribution/Co-payment for Community Based Services

The Code of VA §2.2- 5206, requires local CPMTs to assess parents or legal guardians for the ability to contribute financially toward the cost of services provided. Frederick County CPMT believes families have better outcomes when they are invested and fully engaged in youth who are receiving the services and supports offered through the Frederick County Children's Services Act are encouraged to fully participate in the family engagement process adopted by the Frederick County CPMT. In order to encourage participation and maximize the resources of the community, the CPMT has adopted a policy that, in accordance with the Code of Virginia §2.2- 5206, requires parents and legal guardians/families to contribute financially to ward the provision of services provided, based on according to their ability to pay.

#### 3.8.1 Case Manager Responsibility

- The case manager will determine if the child has been screened and/or enrolled in Medicaid, and whether private insurance or other resources are available to meet the child's needs.
- Prior to an initial referral to the case manager shall notify families of the requirement for an assessment of parental contribution upon accessing CSA funded services. The family shall be informed that failure to provide the supporting documentation to the CSA Office during the assessment process will result the delay of services. Or the suspension of services until such time that the assessment is complete and the parental contribution agreement is signed.
- Case managers shall list the requirement for parental contribution on family plans when appropriate, i.e., care plans, court orders, protective orders, etc.

#### 3.8.2 Eligible Populations

Parents and legal guardians, henceforth referred to as "parents", of children receiving CSA funded services shall be assessed for appropriate financial contribution toward the cost of services to be provided.

Youth and families accessing CSA funded services shall be assessed for a parental contribution, unless specifically prohibited by state or federal law or regulations.

• Under the following eligibility categories will be required to undergo an assessment to establish a monthly parental contribution will be assessed a co-payment:

- Foster Care Prevention
- Non-Mandated
- Non IEP services prescribed by FAPE\*Special Education WrapAround Services

\*Waivers- Parents enrolled in any of the following programs shall waived from the parental contribution:

- Low Income Home Energy Assistance Program
- Federal Public Housing Assistance or Section 8
- Supplemental Nutrition Assistance Program
- Temporary Assistance for Needy Families (TANF)
- Free or Reduced Meals under the National School Lunch Program
- Parents receiving Social Security Disability as their only source of income
- CSA funding of only Drug Screens or Single Evaluations of \$1000.00 or less.

Exemptions- The following eligibility categories are exempt from being assessed for parental contribution toward services.

- Due to School-based IEP required services are exempt from the CSA Parental Contribution policy. Federal regulation for under the Individuals with Disabilities Education Act (IDEA) requires school districts to provide a Free and Appropriate Public Education (FAPE) to

students with a disability. School-based IEP required services are exempt from the CSA co-pay requirement.

- The parents or legal guardians of youth placed in the custody of DSS and those receiving Foster Care Services through a Parental Agreement are Due to being referred to the Division of Child Support Enforcement (DCSE), for the collection of child support, and therefore not assessed a parental contribution toward services. the following populations will not be assessed a co-payment. See Frederick County Referral to DCSE for policy and procedures on the following populations:
  - Youth in Foster Care
  - Youth receiving Foster Care Services through a Parental Agreement
- Waivers Parents enrolled in the following programs will be automatically waived from paying a co-payment:
  - Low Income Home Energy Assistance Program
  - Federal Public Housing Assistance or Section 8
  - Supplemental Nutrition Assistance Program
  - Temporary Assistance for Needy Families (TANF)
  - Free or Reduced Meals under the National School Lunch Program
  - Parents receiving Social Security Disability as their only source of income
  - CSA funding of only Drug Screens or Single Evaluations of \$1000.00 or less.

### 3.8.2 Methodology

3.8.2 Families of children receiving CSA-funded services shall be assessed an amount to contribute toward the cost of services based on the sliding fee scale adopted by CPMT.

- Informed parental consent— the pParents or legal guardians are alerted-informed by the case manager prior to FAPT/MDT that CSA funded services are subject to a co-payparental contribution.
- Individual Family Service Plan or Care Plan – the FAPT/MDT service plan shall identify services eligible for co-payparental contribution.
- CSA Office Screening –The family shall be subject to an assessment-co-pay-screening by the CSA Office representative prior to, or immediately after FAPT/MDT to review-determine fees for prescribed services.
  - Upon initial receipt of the Authorization to Use and Exchange Information, the CSA Account Specialist shall complete a DSS Service Inquiry to determine if the parent is eligible for a waiver.
  - The Pparental co-paycontribution for Non-IEP and Nonmandated services shall be assessed prior to the beginning of services. Services shall not startcommence prior to receiving a signed Copayment Agreement. OrFrederick County CPMT does not believe the assessment for a parental contribution should delay the initiation of CSA funded services. Therefore, authorized services (excluding flat fee or single payment services ie evaluations) may begin during the assessment period. The CSA Office shall complete the assessment and obtain the parent or legal guardian’s signature on the required documentation within 30 days of the service start date.
    - If the CSA Office is unable to obtain the required signatures by the 30<sup>th</sup> day, through no fault of their own, services shall be suspended. The CSA Account Specialist shall direct the case manager and provider to suspend services until otherwise notified by the CSA Office.

**Commented [JJ1]:** From the CSA perspective, requiring the assessment prior to services starting would be much cleaner and easier to monitor. However, I'm concerned how it would impact DSS. It may help move the process along, but it could also delay much needed services...

- o ~~CSA parental co-pay for community-based Foster Care Prevention services shall be waived for the initial 30 day period of services during which time the co-pay will be assessed.~~
- o The parental ~~contribution payment~~ shall be reassessed annually, or in the event of a major change in income, including, but not limited to, change in employment status, household size, enrollment in a waiver eligible program, etc.

### 3.8.3 Amount of Parental Co-~~Pay~~tribution

~~Co-pay~~The parental contribution amounts shall be assessed using the annual total gross income of the parent(s)/legal guardian(s), including SSA, SSI, and/or child support where applicable, with a CPMT-approved sliding fee table based on ability to pay.

### 3.8.4 ~~Co-payment Assessment/Dispute~~Appeals

- ~~Eligible cases for which the Parental Co-Payment Screening Form has not been completed and signed by the parent/guardian shall be assessed the maximum co-payment amount.~~
- Families with extenuating financial situations/hardships, such as extraordinary medical expenses, may request a review/reconsideration by the CSA Coordinator. To be considered, documentation verifying such hardship must be provided. If, after such a review, the family still believes the fee is unjust or inappropriate, an appeal can be ~~filed for review by~~made to the CPMT. The parent/guardian must submit in writing, a letter of appeal to the CSA Office, providing any additional documentation if desired, within 14 days of the date that they receive notice, either orally or in writing, of the CSA Office's co-payment determination. The CSA Office will place the appeal on the next regularly scheduled CPMT meeting agenda. The CPMT shall review the materials provided and render a decision, which shall be final. Within 30 days of the review, the CSA Office will notify the family in writing of the decision of the CPMT.
- Frederick County CPMT understands that events that impact a family's financial situation can occur at any time. It is their policy that families can request a reconsideration or appeal of the assessed parental contribution at any time.
- The appeal of an initial parental contribution assessed shall delay service initiation until a signed agreement is obtained.
- The appeal of an ongoing parental contribution shall not disrupt services being received. However, the previously agreed upon amount will continue through the appeal process until a new agreement is signed or services terminate.

**Commented [JJ2]:** This would be relevant only if services were allowed to start prior to completion of the assessment.

### 3.8.5 Case Manager Responsibility Ongoing Processing

- Parental contributions shall be assessed based on monthly invoices received for services rendered. In no event shall the parental contribution be higher than the cost of services for the month being assessed.
- The CSA Office will send relevant parties an invoice for their portion of the cost of services rendered. Notice of payment due shall be sent via email or postal mail within 10 days of the CSA Office receiving a vendor invoice for services rendered.
- Parental contributions exceeding 30 days past due shall generate a Notice of Past Due Payment to the responsible party(s), case manager, and vendor(s). At any time, parents or legal guardians may request a reconsideration or appeal of the assessed amount, providing verification of any changes that have occurred.

- The CSA Office shall provide 2 Notices of Past Due Payment. If the responsible party(s) does not submit payment in full or commit to a mutually agreed upon alternative arrangement, services shall terminate.

#### ~~3.8.5~~

- ~~The case manager will determine if the child has been screened and/or enrolled in Medicaid, and whether private insurance or other resources are available to meet the child's needs.~~
- ~~The case manager shall notify CSA involved families of the requirement for an assessment of parental contribution upon accessing CSA funded services. The family shall be informed that failure to provide the supporting documentation to the CSA Office during the assessment period will result in being assessed the maximum monthly co-payment amount until such time as the supporting documentation is provided and screening form is signed.~~
- ~~Case managers shall list the requirement for parental co-payment on family plans when appropriate, i.e., care plans, court orders, protective orders, etc.~~

#### 3.8.6 Provider Responsibility

- ~~Service providers are responsible for the collection of the family's assessed financial contribution.~~
- ~~The amount of the assessed co-payment shall be deducted from the authorized funding amount when the purchase of service order is issued.~~
- ~~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.~~
- ~~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 FC 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.~~
- ~~The CSA Coordinator is responsible for monitoring vendor compliance with the Frederick County Co-payment 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.~~

# Parental Contribution Procedures

## Pre-CSA Referral

Case managers should have basic knowledge of the CSA Parental Contribution policy and procedures.

Upon determination that a referral will be made to CSA to access state pool funds, the referring agency Case Manager shall inform the relevant party(s) of the obligation to be assessed for a parental contribution. If questions arise, the case manager may defer the family to the CSA Office to gain a more detailed explanation of the process.

## Initial Referral

Upon receipt of the Authorization to Use and Exchange Information, the CSA Office shall submit a DSS Service Inquiry to make an initial determination of eligibility for a Waiver. If the inquiry shows no enrollment in qualifying benefits, the CSA Account Specialist shall contact the responsible parties to discuss additional means to waive eligibility or obtain acceptable income verification.

- If the CSA Office obtains verification that the family qualifies for a Waiver of the parental contribution, the CSA Office will complete the Parental Contribution Agreement indicating the eligibility for a Waiver and obtain the signatures of the responsible party(s).
- If the family does not qualify for a waiver, the CSA Account Specialist shall determine the amount of parental contribution based on the sliding fee scale adopted by CPMT. Those individuals responsible for payment of the assessed amount must sign the Parental Contribution Agreement. The assessed party(s) must complete a New Vendor form to process Parental Contributions through Thomas Brothers.

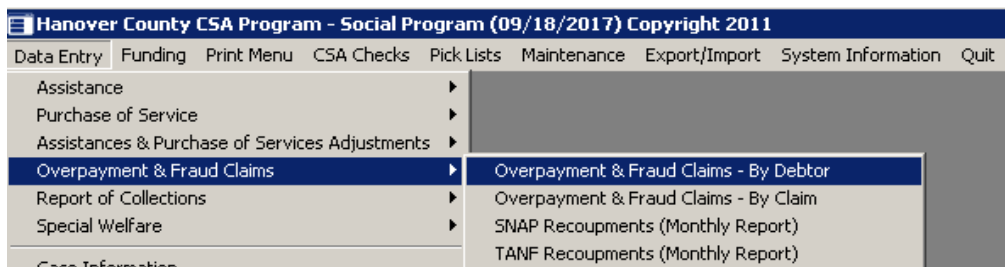
## Thomas Brothers Data Entry

The CSA Account Specialist will submit the New Vendor form to the DSS Fiscal Assistant III to enter into the Thomas Brothers software system. DSS will notify the CSA Account Specialist once completed.

The CSA Account Specialist will complete data entry as follows:

1. Add Parental Contribution Information

Select Data Entry ➡ Overpayment & Fraud Claims ➡ Overpayment & Fraud Claims-By Debtor



Click the Add button in the top ribbon.

Select the Vendor overpayment/fraud or Parental Co-Payment button.

- (1) Select the Vendor from the drop-down menu
- (2) Click OK

- (3) In the Notes tab, select Add Note
- (4) Enter the date of the assessment
- (5) Enter the subject as Assessment
- (6) Enter the assessed amount
- (7) Save

2. Create a Claim in Thomas Brothers

Invoicing:

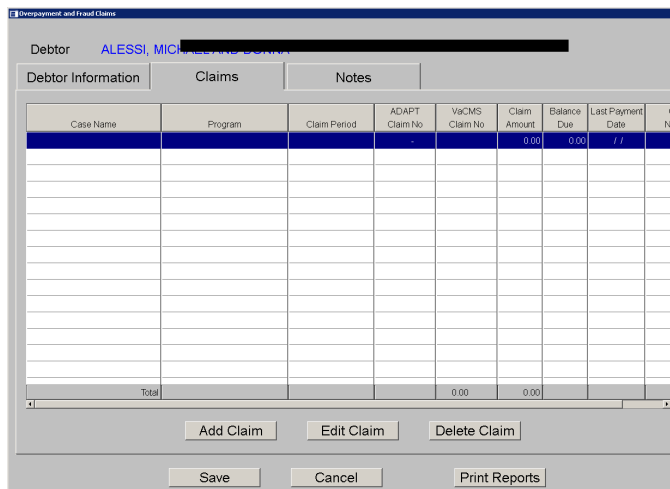
The CSA Office will provide invoices to the parent(s). All parental contributions will be paid directly to the CSA Office and are due within 30 days of the invoice date.

The Parental co-payment amount shall not exceed the cost of services rendered for the corresponding month.

Select Data Entry – Overpayment & Fraud Claims – Overpayment & Fraud Claims – By Debtor.



- (1) Select the parent(s)/legal guardian(s) name.
- (2) Select the Claims tab at the top of the screen.
- (3) Click on the Add Claim.



- (1) The Claim data entry screen will open.
- (2) The Claim Date will be 30 days after the Invoice Date or the closest business day.
- (3) The Claim Amount is the assessed amount.
- (4) The Program Type is Parental Copayments and the FIPS Code is 069 Frederick County.

- (5) Select Co-payment from the Claim Type.
- (6) The Claim Period is the beginning of the month year and ending of the month year.
- (7) Select the Case Name associated with the Debtor.
- (8) If a note needs to be visible on the invoice, enter it in the Demand Note field.
- (9) Save once all fields are filled.
- (10) Repeat these steps for each invoice.
- (11) Once all information has been entered for the month, exit the Overpayment & Fraud screen.

### 3. Printing Invoices in Thomas Brothers

- (1) Select Print Menu → Overpayment & Fraud Claims → Overpayments & Claims Demand Letters.
- (2) In the popup screen, enter the invoice date as the Balance as of date and the due date for 30 days later.

- (a) Uncheck Exclude Claims whose payment method is Recoupment and Exclude Claims which have made 'CASH' payments within the last 31 days.
- (b) Check the box for Record note regarding the mailing of demand letter.
- (c) This will create a note in the Overpayment & Fraud Claims.
- (d) Select Ok.
- (e) Choose Select All and Ok.
- (f) Preview the file and save a copy in the client record.

Email a copy of the pdf to the CSA Coordinator to confirm that the amounts are accurate based on the services provided for that month.

Once the CSA Coordinator approves, the invoices will be sent via email or post mail.

### 4. Payments and Collections

All parental contributions will be paid directly to the CSA Office and are due by the 30<sup>th</sup> day following the invoice date.

All payments will be processed as refunds to CSA pool funds and will be collected in accordance with Frederick County Policies.

### 5. Monthly Aging Report and CPMT Communication

The CSA Account Specialist prepares a Monthly Aging Report spreadsheet for parental contributions. The spreadsheet contains the case name, monthly co-payment amount, amount paid in the current fiscal year, amount of co-payments that are current, 30 days, 60 days, and over 90 days outstanding, a total for each case, date of last assessment, notes and recommendations.

The CSA Coordinator shall report the status of collections and past due accounts to the CPMT in the monthly Financial Report.

CPMT

How do you want to handle delinquent accounts, collections, write-offs, etc...



## Determination of Family Income

We base it on total household income. If the guardians receive any public assistance, they are exempt. We would consider child support total income.

---

Definition of Household- 1 or more adults and dependent children in their legal custody residing in the same household. There may be more than one family unit in a household. Separate units are separate families for the purpose of determining parental contribution levels. Examples of separate family units may include, but are not limited to, related adults (other than spouses) living in the same household, an aged parent living with an adult child, a young adult child living with his/her parents and paying room and board expenses.

Family Unit Exception #1: If a biological parent is absent from the home and retains custody rights, his/her income shall also be subject to a parental financial contribution unless that parent is providing monthly child support payments.

Family Unit Exception #2: If a cohabitating couple consents to being considered a family unit, they and their dependent children shall together be considered a single family unit and their combined incomes shall be used in determining total family gross income.

2. The number of family members shall be the members of the separate family unit as determined in #1 above.
  3. Dependents include all individuals who are members of the family unit (as determined in #1 above) and are solely dependent on the total family unit gross income for subsistence.
  4. The total gross annual income includes all income received by all members of the family unit (prior to deductions for taxes, insurance, benefits, etc.). It includes but is not limited to salaries (full-time, part-time, primary and secondary employment), Supplemental Security Income, Social Security Income, General Relief, Pension Benefits, Railroad Retirement, Military Retirement, Worker's Compensation, Unemployment Insurance, Child Support, Alimony, and Interest, Dividends or other Payments from annuities, trusts, life insurance policies or other forms of investment.
- 

The purpose of this policy is to comply with the COV § 2.2-5206 (3) and to establish parental contribution guidelines that are fair and equitable for all families.

Parental contribution (co-payment) is assessed upon referral for CSA services and reviewed at each FAPT meeting based on the total legal guardian's "taxable annual income" listed on the IRS Individual Income Tax Return form. If a family is unable to produce their most recent IRS Individual Income Tax Return form, then two recent paystubs can be used to calculate net annual income. When assessing parental contribution, the household income will be adjusted by the number of dependent children in the home. For families with more than one child accessing CSA services, parental contribution is assessed per family, not per child.

If a parent is absent from the home but retains custody rights, his/her income shall also be included in the determination of the parental financial contribution unless the parent who is absent from the home is providing child support payments. If the household includes adults who are not acting in a caregiving capacity (e.g., a young adult child living with parents, an aged parent living with adult child), these adults will not be included when determining household income. The income of live-in kin, fictive-kin, and

significant others (i.e., parent’s boyfriend or girlfriend) is not included in the parental contribution assessment.

Assessment of the household income is used to determine the parental contribution for all CSA pool fund services. The table below describes the incomes that will be considered when determining household income.

Household Income Determination	
Person	CSA Pool Fund Services (Community-Based and Residential Services)
Parent(s) or Legal Guardian	Yes
Divorced Parent  1. Joint Custody  2. Pays Child Support	1. Include both incomes  2. Custodial parent income included
Kin/ Fictive kin/ Significant Other	No

Upon notification of the assessed parental contribution amount, the parent or legal guardian has two options: agree to the assessed copayment amount or request a waiver reduction by completing the Waiver Reduction Form.

\*Note that CSA pool fund services may not begin until a parental contribution agreement has been signed by the parent(s) or legal guardian(s). The CSA Unit will determine the parental co-payment within the first thirty (30) days of service authorization during a FAPT meeting. The assessed parental co-payment goes into effect on day thirty-one (31) of services being initiated and are sent out on a monthly basis. It is CPMT’s policy that the parental co-payment process does not impact the start of FAPT-authorized services.

#### Parental Contribution Fee Waiver/Reduction & Hardship Policy

Parents and legal guardians may request a parental contribution waiver or reduction due to financial hardship when services are first requested or at any point that their child(ren) is receiving services if they experience a financial hardship. Some examples of financial hardship that may be considered include a decrease in income, job loss, medical expenses, and loss of housing. Requests for a parental contribution waiver or reduction can be made to the family’s assigned case manager and will be assessed on a case-by-case basis. The CSA Management Team will review requests for such and may waive or reduce the assessed copayment amount based upon documentation of financial hardship. In the absence of such a

waiver or reduction, parents/legal guardians are required to pay the assessed parental contribution (co-payment) amount for their children to receive CSA-funded services.

If the parents' income level qualifies the family or child for an income-based assistance program, such as Temporary Assistance for Needy Families (TANF); Supplemental Nutrition Assistance Program (SNAP); Housing Choice Voucher Program (HCV); energy assistance, income-based medical assistance (i.e., Medicaid); the free and reduced cost lunch program; and Project HOPE, then the family may submit proof of the benefit in lieu of submitting income verification. The CSA Program may verify benefits and eligibility through intra-agency data sharing with DFS Self-Sufficiency or other human services agencies with proper consent. The school administration or designee may verify eligibility for federal school lunch benefits with written parental consent. Eligibility for waiver due to qualifying income-based benefits is assessed upon referral and reviewed at each FAPT meeting.

#### Delinquent Accounts Policy

The CSA program sends monthly parental co-payment notices to each parent assessed a co-payment for CSA services. When a parental co-payment is in arrears for ninety (90) days, the CSA Office sends the family a written notice stating that they have ten (10) days from the letter date to pay, or make arrangements for, the full amount due or the account will be sent to the Treasurer's Office for collection. The CSA program retains the right to notify the vendor to stop services after day ten (10) if the parents have not paid the outstanding co-payment balance.

#### Absent Parent Policy

CSA recognizes that there are sometimes challenging family dynamics that may impact the collection of financial documents needed to assess parental contribution. In circumstances where there is an absent or non-engaged parent, the financial information outlined in the Parental Contribution Policy will be collected from the parent or legal guardian who is engaged and seeking services on behalf of their child. Parental contribution assessed in the absence of one parent will be done so in good faith and is subject to reassessment if the absent parent becomes involved in their child's service planning and at the time of each FAPT meeting.

---

### **DEFINITIONS:**

Annual gross income: All income including, but not limited to, income of the custodial parent(s) from salaries, retirements, pensions, SSA, railroad retirement, military retirement, Worker's Compensation, unemployment benefits, alimony, interest and dividends. Verification by CSA staff is required for all income sources. For the copayment assessment, the gross income of an adoptive parent is included, a stepparent is not included.

Household: Includes one or more adults who are acting in a caregiving capacity and residing in the same home except for:

- a. Adults who are not acting in a caregiving capacity (e.g., adult child living with parents, an aged parent living with adult child) are not included when determining household income.
- b. The income of kin and fictive-kin who are caretakers is not counted when determining the parental financial contribution.

Parent: For the parental contribution assessment, the custodial parent (where the child resides) will complete the assessment for CSA services.

- a. Adoptive parents are assessed a parent contribution as the legal parent of the child.
- b. Parental contribution requirements do not apply to extended family members (grandparents/aunts/unless/etc.) providing residence for the child(ren) receiving services as they contribute in-kind by maintaining a stable placement for the child(ren).
- c. If a biological parent does not live in the home and retains parental rights, their income shall also be subjected to a parental financial contribution, unless that parent provides verified monthly child support payments.
- d. If the child resides with both parents and neither is paying child support, both parents will be assessed a parental contribution.

# Fiscal Year 2024 CSA Local Agency - Annual Risk Assessment Survey

The Program Audit Activity of the Office of Children's Services (OCS) is responsible for evaluating the adequacy and effectiveness of governance, risk management, internal control, and compliance activities of local CSA programs, governed by requirements established in the Code of Virginia, Children's Services Act (§ 2.2-5200) and policies adopted by the State Executive Council (SEC). The basis for audit selections include risk assessment, management and stakeholder input, and the established audit cycle (every three years). The purpose of this survey is to collect information pertaining to local CSA programs that is necessary to complete the risk assessment, and to solicit input from local agency stakeholders that is specific to each of the individual programs. As you complete the survey, please keep in mind that a high risk rating does not guarantee that your program will be subject to an immediate audit. Further, a low risk score does not mean that your program will not be audited in the near future.

Instructions: Survey questions may be discussed with the full Community Policy and Management Team (CPMT). However, the CPMT Chair or designee should complete and submit only one survey per locality. Responses are due by 5:00pm on Friday, July 14, 2023.

Your prompt and thoughtful responses to this risk evaluation are greatly appreciated. If you have any questions about this survey, please contact Stephanie Bacote, Program Audit Manager at (804) 662-7441.

\* Required

## Respondent's Contact Information

(In case follow-up is necessary)

1. Locality Name \*

2. Respondent's Name \*

3. Respondent's Title \*

4. Respondent's Phone Number \*

## Inherent Risk Evaluation

The following risk factors may hinder achievement of objectives, if mitigating actions are not taken. Please rate the degree in which your local CSA program has experienced or have been affected by the situations described below.

(Note: A "high" rating is indicative that the risk exposure described exists and has significantly affected the local program. A "low" rating is indicative that the risk exposure is not present ,or where it exist that there has been little or no affect to the local program.)

5. CHANGES IN OPERATIONS: Extent to which changes in funding, staffing, operating practices/procedures over the past 24 months have affected your local program as the changes are absorbed. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

6. PRESSURE TO MEET OBJECTIVES: Extent to which the local program has been vulnerable to reductions in the quality of service provided, increased operating cost, or lessening of controls/ procedures to achieve federal, state, and local objectives. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

7. ADVERSE PUBLICITY: Extent to which unfavorable exposures (industry and/or public media) over the past 24 months have affected your local program's ability to secure and maintain public trust and confidence. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High



8. SERVICE DELAYS: Over the past 24 months, the extent to which failure to meet stated service levels has seriously affected relations with stakeholders, created serious internal problems, and/or affected the program's reputation. \*

- Low
- Slightly moderate
- Moderate
- Slightly High
- High

9. CONFIDENTIALITY OF DATA: Extent of loss or embarrassment over the past 24 months that was due to unauthorized or premature disclosure of protected information. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

10. INACCURATE DATA: Extent that incorrect data generated over the past 24 months has affected the integrity and reliability of data reported by the local program, and consequently shared by other state and local stakeholders. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

11. PROCESSING SOPHISTICATION: Extent to which the reliability of manual and/or automated technology processes used in the local program's process flow over the past 24 months has impacted performance of daily operating activities. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

12. HISTORY OF FRAUD: Extent to which actual or alleged incidences fraud occurring with in the past 24 months has impacted the local program. \*

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

## Control Risk Evaluation

The following factors that are established to mitigate risks could potentially lose their effectiveness over time, and thus no longer function as intended. Please rate the degree in which your local CSA program has experienced or has been affected by the situations described below.

(Note: A "low" rating is indicative that the risk control described exists and is functioning as intended. A "high" rating is indicative that the risk control described does not exist, or where it does exist that the control is not working as intended).

13. EXPERIENCE LEVEL OF THE MANAGEMENT TEAM: Collectively, the extent of management's understanding of state and local CSA operations and understanding of management principles (planning, directing, and monitoring). Consider length of CSA experience.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

14. INFORMATION TECHNOLOGY SECURITY: Extent that appropriate actions have been taken to protect sensitive/confidential data from unauthorized access, such as the use of restricted areas, passwords, and encryption devices.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

15. AUDIT COVERAGE: Extent that internal and/or external reviews are of a quality and frequency of which to provide comprehensive evaluations of the local program.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

16. ABILITY TO OVERRIDE POLICY: Extent of the ease to which management takes actions that supersede the state and local policies/procedures adopted that govern the local program.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

17. CONTINGENCY PLANNING: Existence of a documented plan to ensure continuation of services in the event of an emergency (e.g. natural disaster) or other short/long-term service disruptions (e.g. extended absence of CSA Coordinator).

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

18. ADEQUACY OF POLICIES AND PROCEDURES: Extent to which local program policies and procedures are written, comprehensive, clear, accessible, aligned w/federal and state laws and policies where applicable, periodically reviewed and updated.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

19. MEASURABLE GOAL/OBJECTIVES/PERFORMANCE TARGETS: Extent to which the management team has established benchmarks to gauge achievement; that are documented, reviewed/updated periodically, and disseminated.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

20. MANAGEMENT REVIEW/QUALITY ASSURANCE: Extent to which the management team regularly receives and effectively acts upon formal reports detailing major aspects of the local program to ensure compliance with state and local requirements.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

21. TRAINING: Extent to which a conscious effort is made to regularly provide training to local program stakeholders; that there is evidence that training needs of key stakeholders are met.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High



22. SEGREGATION OF DUTIES: Extent to which duties in the local program's processing stream (i.e., service planning recommendations by FAPT and funding authorizations by CPMT) are optimally separate.

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

23. CONFLICTS OF INTEREST: Extent to which local representatives adhere to state and local disclosure requirements (i.e. timely notification; completed disclosure forms; abstain from voting where applicable).

- Low
- Slightly Moderate
- Moderate
- Slightly High
- High

# Stakeholder Feedback

All local programs are scheduled to be audited during the current three year audit cycle (Fiscal Years 2024-2026). Audit selections are based on the evaluation of many factors, including but not limited to risk/severity concerns, availability of resources, and input from OCS management and other state/local CSA stakeholders. Please note that a response to the following questions would NOT automatically result in the local CSA program receiving a higher risk ranking in the scheduling of audit priorities.

24. Please list and briefly describe any best practices, major achievements, and/or concerns that you have regarding your local CSA program.

25. Are there any particular areas of your program that you would like a callback from an auditor to discuss considerations for a more focused review? If yes, please provide a brief description.

---

This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

**From:** [Mucha, Marsha \(CSA\)](#)  
**To:** [Mucha, Marsha \(CSA\)](#)  
**Subject:** "[External]"Fw: Approval of 5 New Title IV-E Evidence-Based Programs  
**Date:** Wednesday, May 24, 2023 9:30:02 AM  
**Attachments:** [Outlook-1f2k3wwo.png](#)

---

Good Morning -

Please see the information below concerning new Title IV-E evidence-based programs.

Thank you,  
Marsha Mucha

*Marsha Mucha*



**Marsha Mucha**

Administrative Staff Assistant

Office of Children's Services

[1604 Santa Rosa Rd., Suite 137, Richmond, VA](#)

[23229](#)

[804-662-9815](#) (Office)

[804-662-9831](#) (Fax)

[marsha.mucha@csa.virginia.gov](mailto:marsha.mucha@csa.virginia.gov)

[www.csa.virginia.gov](http://www.csa.virginia.gov)

*The information in this email and any attachments may be confidential and privileged. Access to this email by anyone other than the intended addressee is unauthorized. If you are not the intended recipient (or the employee or agent responsible for delivering this information to the intended recipient), please notify the sender by reply email and immediately delete this email and any copies from your computer and/or storage system. The sender does not authorize the use, distribution, disclosure or reproduction of this email (or any part of its contents) by anyone other than the intended recipient(s). Additionally, no representation is made that this email and any attachments are free of viruses. Virus scanning is recommended and is the responsibility of the recipient.*

---

**From:** Fusion Server <donotreply@dss.virginia.gov>  
**Sent:** Wednesday, May 24, 2023 8:23 AM  
**To:** Reiner, Scott (CSA) <Scott.Reiner@csa.virginia.gov>  
**Subject:** Approval of 5 New Title IV-E Evidence-Based Programs

## [Approval of 5 New Title IV-E Evidence-Based Programs](#)

**Categories:** [Family Services](#)

The purpose of this Broadcast is to inform local departments of Social Services (LDSS) of

five (5) new evidence-based programs (EBPs) that are eligible for title IV-E Prevention Services funding: Brief Strategic Family Therapy (BSFT), Family Check-Up (FCU), Homebuilders (HB), High Fidelity Wraparound (HFW), and Motivational Interviewing (MI). As a requirement of the Family First Prevention Services Act (FFPSA), states must have an approved Prevention Plan on file with the Children's Bureau. Virginia's initial Prevention Plan was approved and went into effect on July 1, 2021. That plan described Virginia's strategy to implement Family First and which EBPs the LDSS would be able to claim title IV-E Prevention funds for. In the initial plan, Virginia identified three EBPs: Multisystemic Therapy (MST), Functional Family Therapy (FFT), and Parent-Child Interaction Therapy (PCIT). In an effort to expand the service array, meet the needs of more families, and improve outcomes, Virginia identified the five aforementioned EBPs (BSFT, FCU, HB, HFW, & MI) to be included in the plan. The Virginia Department of Social Services (VDSS) submitted an amendment to the initial Prevention Plan to include these five EBPs, which recently received final approval from the Children's Bureau. The full plan will be available on the public [FamilyFirstVirginia.com](https://www.familyfirstvirginia.com).

It is important to note that MI will be utilized very differently than the other EBPs. While the other seven (7) EBPs are services that the LDSS will refer a family to a provider to receive, MI has been approved for use by LDSS In-Home Services staff. More information about the implementation of MI may be found on the [MI Fusion page](#).

In order to utilize IV-E Prevention funds for these EBPs, LDSS must have an In-Home Services case open with the family and meet all of the IV-E Prevention funds requirements. Guidance on the utilization of these funds and the case requirements are in the Child and Family Services Manual: [Chapter B, Section 2 – Prevention and In-Home Services to Families](#); and [Chapter I, Section 2 – Title IV-E Prevention](#). The amendment was signed with a retroactive effective date of July 1, 2022. If an LDSS used CSA funding for one of the new EBPs for a family with an In-Home Services case, and all of the other requirements were met during that time, please reach out to your [Regional In-Home Practice Consultant](#) to determine if reimbursement is possible.

Through collaboration with the [Center for Evidence-based Partnerships in Virginia](#) (CEP-Va), VDSS is able to fund the training of community-based providers in these EBPs. If a provider in your community is interested in being trained in MST, FFT, PCIT, BSFT, FCU, or HB, please refer them to [CEP-Va's online application](#). CEP-Va also created this [one-page EBP comparison table](#) for LDSS to easily reference when service planning with families.

Certified EBP Providers:

- MST – <https://www.mstservices.com/our-community>
- FFT – <https://www.fftlc.com/sites>
- PCIT – <https://www.pcit.org/find-a-provider.html>
- HFW – [https://www.csa.virginia.gov/Content/doc/ICC\\_Trained\\_Providers.pdf](https://www.csa.virginia.gov/Content/doc/ICC_Trained_Providers.pdf)
- BSFT
  - [SPARK](#) (757)461-5098 – Tidewater area
  - [Strategic Therapy Associates](#) (800)716-3534 – Tidewater area
  - [Healing Strides](#) (540)334-585 – Roanoke area
- FCU
  - [Horizon Behavioral Health](#) (434)477-5000 – Lynchburg area
  - [People Places](#) (540)437-1857 – Shenandoah Valley & Charlottesville areas

While title IV-E Prevention funds are only able to cover these EBPs through an LDSS In-Home Services case, VDSS encourages LDSS and local CSAs to consider them first whenever working with families, as they are trauma-informed and are proven to have

positive outcomes. [CEP-Va's YouTube channel](#) has individual, in-depth, one-hour videos on each of the eight (8) EBPs, as well as a recently released two-hour video that covers them all.

Please direct questions to the Family First Team via email [FamilyFirst@dss.virginia.gov](mailto:FamilyFirst@dss.virginia.gov).

[Unsubscribe](#)