



COMMONWEALTH of VIRGINIA

Scott Reiner, M.S.
Executive Director

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

August 3, 2017

Ms. Alisha Vines, CPMT Chair
Orange County CSA Program
146 Madison Road, Suite 205
Orange, VA 22201

RE: Orange County Children's Services Act (CSA) Program
Audit Self-Assessment Validation, File No. 13-2017

Dear Ms. Vines,

In accordance with the Office of Children's Service's (OCS) Audit Plan for Fiscal Year 2017, the Orange County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local CSA Program. An on-site visit was scheduled and conducted by OCS Program Auditors on June 29, 2017 to perform the independent validation phase of the process.

Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Orange County CSA program, our independent validation:

Concurs Partially Concurs Does Not Concur

with the conclusion reported by the Orange County CPMT that no significant observations of non-compliance and/or internal control weaknesses were identified in the design or operation of the processes or services conducted on behalf of Orange County CSA. The explanation for our assessment results are as follows:

The Orange County CPMT concluded that there were only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified deficiencies indicating non-compliance and internal control weaknesses in the local CSA program. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affecting CSA funded activities, as well as 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 pertaining to the Orange County CSA Program are detailed on pages two (2) through three (3).

SIGNIFICANT NON-COMPLIANCE OBSERVATIONS

1. Membership of the Orange County CPMT is not consistent with the Children's Services Act (CSA) requirements and Orange County CPMT By-Laws. The composition of the CPMT did not include a Health Department Representative.

Criteria: COV [§ 2.2-5205](#), Orange County CPMT Bylaws

2. A current Statement of Economic Interest (SOEI) form was not completed and submitted by the parent representatives appointed to the CPMT and Family Assessment and Planning Team (FAPT). A similar observation regarding the timely submission of completed forms was verbally communicated to the CPMT during the prior audit conducted in 2014.

Criteria: COV [§ 2.2-5205](#) , [§ 2.2-3115](#), and Orange County CPMT BY-LAWS as adopted August 28, 2012, **Article III – Membership**, Item D.

RECOMMENDATIONS

1. The Orange County Board of Supervisors, in accordance with COV [§ 2.2-5205](#) and the Orange County CPMT Policy and Procedures Manual, Policy No.: C3, (A) and (G), has the responsibility of appointing and filling vacant CPMT positions. The CPMT chair should ensure that this vacancy is made known to the Board of Supervisors as soon as possible and follow up periodically until the vacancy is filled. On July 24, 2017, a letter was sent to the Orange County Board of Supervisors requesting the vacancy to be filled.
2. The CPMT chair should ensure that the CPMT and FAPT Parent and Private Provider representatives immediately complete and submit a Statement of Economic Interest (SOEI) and annually thereafter by the established due date of February 1.

CLIENT COMMENTS

Response to #1:

All vacancies will be immediately reported to the County Administrator and the Chief Deputy Clerk so that the Board of Supervisors shall remain up-to-date on membership. The current vacancy for the Department of Health has been addressed and a member has been appointed. The representative plans to attend their first meeting in August.

Response to #2:

This topic has been discussed within our administration as well as with our County Attorney and we will continue to address the issue and develop a plan to ensure the forms are collected as required.

SIGNIFICANT INTERNAL CONTROL WEAKNESS

CPMT meeting minutes revealed thirty (30) collective absences of CPMT members during the 2016 calendar year. The local Department of Juvenile Justice (DJJ), the local Department of Social Services (DSS), and the Parent Representative did not attend the required 75% of the regularly scheduled 2016 meetings. There were five months between April and October 2016 when both the DJJ and DSS were not in attendance for the same meetings. With the inclusion of the vacancy of the Health Department representative and absences of the parent representative, 50% of the CPMT membership did not demonstrate active participation in the governance activities of the CPMT. In addition, it appears that a quorum was not present at the April 21, 2016 CPMT meeting, which is required to conduct business.

Summary of Substantial Absences				
CPMT Representative	# Required to meet 75%	#Actual Missed	Non-compliance Rate	%
DJJ	9	8	8 of 12	67%
DSS	9	8	8 of 12	67%
Parent ^{Note1}	6	4	4 of 8	50%
Note1: No parent representative from June 30, 2016 to September 28, 2016; therefore, scheduled meetings during that period were not included in the assessment.				

Attendance and formation of a quorum for CPMT meetings are locally governed in accordance with the Orange County CPMT By-Laws, as adopted August 28, 2012. **Article III – Membership**, Item I, states “Any member of the CPMT who fails to personally attend at least seventy-five (75%) of the regular meetings within any calendar year shall be reported to the Orange County Board of Supervisors.” **Article VII – Meeting**, Section III states “Provided that at least one member of the Executive Committee is present, 50% of the CPMT’s members shall constitute a quorum for all CPMT meetings.” The frequency of CPMT member absences creates substantial risks including potential inability to form a quorum, impediments to collaboration among public agencies, parent and private provider representatives, concentration of power in a few CPMT members, and difficulty rotating duties and offices or establishing effective committees.

Criteria: [COV§ 2.2-5200](#); Department of Accounts, Agency Risk Management and Internal Control Standards (ARMICS), Control Environment.

RECOMMENDATIONS

The CPMT Chair should report to the Orange County Board of Supervisors, as soon as administratively feasible, when a CPMT member misses more than 3 (25%) CPMT meetings during the calendar year and every absence thereafter. When possible, local department heads should name an alternate and/or designee with authority to commit department resources to attend CPMT meetings if they are not able to attend regularly scheduled meetings.

CLIENT COMMENTS

The frequency of absences had been discussed during the time in which we were reviewed by members of CPMT. Several attempts were made to ensure appointed members were present for meetings. The findings of the audit were discussed at the July 2017 CPMT meeting, in specific, this deficiency. Discussion was held on the importance of having a back-up in case a member cannot make a meeting in order to maintain our quorum for business. One suggestion made was to report attendance in quarterly to the Board of Supervisors (BOS) within their reports that our office provides to them regarding the Orange County CSA program. This will be discussed at the August meeting to determine the best way to keep the BOS informed of member absences.

Ms. Alisha Vines, CPMT Chair
August 3, 2017
Page 4

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Orange County CPMT and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Alisha Vines, CPMT Chair, and Letitia Douthit, CSA Coordinator during our on-site visit. Their combined efforts enabled the audit staff to resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,



Donald Barcomb
Program Auditor



Stephanie S. Bacote, CIGA
Program Audit Manager

cc: Scott Reiner, Executive Director
R. Bryan David, Orange County Administrator
Dawn Watson, CPMT Fiscal Agent
Letitia Douthit, CSA Coordinator
SEC Finance and Audit Committee