

FREDERICK COUNTY CPMT AGENDA

January 22, 2023
1:00 PM
107 N Kent St
Winchester, VA
1st Floor Conference Room

- I. Introductions
- II. Adoption of Agenda
- III. Consent Agenda
 - A. December Minutes
 - B. Budget Request Forms
- IV. Executive Session
 - A. Invoice for Evaluation
 - B. Prior FY Invoice
 - C. Funding Gap
 - D. Funding Gap
- V. Committee Member Announcements
- VI. CSA Office
 - A. CSA Committee Vacancy Updates
- VII. Old Business
 - A. UR/CQI Policy Revision
 - B. FAPT Structure Policy Discussion
- VIII. New Business
 - A. IACCT Policy Discussion
- IX. Informational Items
 - A. GA FY23 Progress Report on the CSA
 - B. SEC Policy Proposals Public Comment Period
- X. Assigned Tasks
- XI. Next CPMT Meeting
 - January 22, 2024, 1:00-3:00pm, 1st Floor Conference Room
- XII. Adjourn

**Instructions for Closed Session:

- Motion to convene in Executive Session pursuant to 2.2-3711(A)(4) and (16), 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-
- Certification 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, December 18, 2023

The Community Policy and Management Team (CPMT) met in the 1st Floor Conference Room at 107 N Kent St, Winchester, VA 22601, on December 18, 2023, at 1:00 pm.

The following members were present:

- Leea Shirley, Lord Fairfax Health District
- Denise Acker, Northwestern Community Services Board
- Jay Tibbs, Frederick County Administration
- Dr. Michele Sandy, Frederick County Public Schools
- Tamara Green, Frederick County Department of Social Services
- Jerry Stollings, 26th District Juvenile Court Service Unit

The following members were not present:

- David Alley, Private Provider Representative, Grafton Integrated Health Network

The following non-members were present:

- Jacquelynn Jury, CSA Coordinator
- Sarah Makomva, CSA Account Specialist

Call to Order: Dr. Michele Sandy called the meeting to order at 1:01 pm.

- I. Introductions
- II. Adoption of Agenda- Denise Acker made a motion to adopt the December agenda; Jay Tibbs seconded. CPMT approved the adopted agenda.
- III. Consent Agenda- The following items were included in the Consent Agenda for CPMT's approval:
 - A. November 27, 2023 - CPMT Minutes. Leea Shirley motioned to approve the November minutes; Denise Acker seconded. CMPT approved.
 - B. Budget Request Forms- Confidential Under HIPAA. Tamara Green made a motion to approve the Budget Request Forms; Jay Tibbs seconded. CPMT approved.
- IV. Executive Session
 - A. None
- V. Committee Member Announcements
 - A. Denise Acker announced The Children Services Center is now located on Front Royal Pike. They are no longer located on Braddock Street.
 - B. Jay Tibbs announced there is an upcoming vacancy on the Board of Supervisors for the Shawnee District.
- VI. CSA Office Business
 - A. CSA Committee Vacancy Updates- Jackie Jury announced the potential Private Provider Rep accepted a position at another agency. She has withdrawn her submission. Jackie stated she still has not had anyone show interest in the Parent Rep position at this time. She will continue to send out reminders monthly.
- VII. Old Business
 - A. UR/CQI Policy Revision- Jackie Jury submitted an initial proposal for the UR/CQI Policy Revision as well as a redacted UR report for CPMT to review. CPMT will review and take action during next month's meeting.

- B. Proposed FAPT Structure- The team discussed timeliness of FAPT case reviews and length of time being used to complete documentation. A document outlining the FAPT Structure developed during the CPMT Retreat and reviewed during the Joint FAPT/CPMT meeting was provided for discussion.
- Jerry Stollings made a motion for FAPT paperwork to be turned in by case managers by close of business Tuesday to be reviewed by CSA. Requiring that all IFSP paperwork must be correct when submitted or it will need to be returned to case worker and their director by close of business Friday. Once corrected, it will then be returned to CSA by close of business Monday or it will be removed from the FAPT agenda. Effective immediately. Denise Acker seconded. CPMT approved.
 - Jerry Stollings made a motion to modify the above time FAPT paperwork needs to be turned in to midnight on Tuesday to reflect current policy. Denise Acker seconded. CPMT approved.
 - Jerry Stollings made a motion to adopt the proposed FAPT Structure as policy. Effective immediately. Tamara Green seconded; Dr. Michele Sandy - Nay. CPMT approved.
 - Jerry Stollings made a motion to note it is the expectation that case managers are responsible for all follow up, note taking, tracking, etc., regarding FAPT cases, not the responsibility of CSA. Effective immediately. Tamara Green seconded. CPMT approved.
- VIII. New Business
- A. None
- IX. Informational Items
- A. None
- X. Assigned Tasks- Dr. Michele Sandy will email the FAPT team and case managers an outline of the changes that were made effective immediately regarding the adoption of the FAPT Structure Policy and the motions that were approved by CPMT.
- XI. Next CPMT Meeting
- January 22, 2024, 1:00-3:00pm, 1st Floor Conference Room
- XII. Adjourn at 1:52 pm: Denise Acker made a motion to adjourn the meeting, Leea Shirley seconded. CPMT agreed.

Minutes Completed By: Sarah Makomva

3.4 Utilization Review and Continuous Quality Improvement (UR/CQI)

Utilization Review and Continuous Quality Improvement are processes used by purchasers of health and human services to ensure the highest quality of care is being provided. The goal of UR/CQI is to employ a set of standards designed to assess the appropriateness of care, including quality, level, and effectiveness of treatment. The Code of Virginia (COV) requires that each Community Policy and Management Team (CPMT) develop policies regarding the review and monitoring of all CSA funded services. Specific mandates for the State Executive Council, CPMTs, and Family Assessment and Planning Teams (FAPT) can be found in the COV sections §2.2-2648 D.15, §2.2-5206.13, and §2.2-5208.5 respectively. In Frederick County, UR/CQI is performed by case managers, MDT and FAPT reviews, and in certain circumstances a UR/CQI Specialist.

Purpose

The purpose of this policy is to establish local guidelines and procedures for the provision of UR/CQI in accordance with Virginia regulation and further define the role and requirements of the UR/CQI Specialist.

Definitions

Utilization Review: UR is a systematic process of evaluating the appropriateness, necessity, and efficiency of mental health services provided to individuals. It involves assessing the utilization of services against established criteria to ensure that they meet the needs of the recipients and are delivered in the most effective manner.

Continuous Quality Improvement: CQI is an ongoing, systematic process aimed at enhancing the quality, efficiency, and outcomes of mental health services. It involves the assessment of service delivery, identification of areas for improvement, and implementation of strategies to optimize service effectiveness.

Applicability

This UR/CQI policy applies to the Frederick County Children's Services Act (CSA) Office. It specifically addresses the roles and responsibilities of each party in the completion of UR/CQI activities.

UR/CQI Specialist Responsibilities

The UR/CQI Specialist is responsible for performing utilization review for children, youth, and families receiving CSA funded services under the following circumstances:

- Youth referred for congregate care placement.
- Youth placed in congregate care environments.
- Youth before the court who have been placed on notice with the Department of Social Services (DSS).
- Youth and/or families receiving more than 25 hours per week of community-based services.
- Youth and/or families receiving CSA funded services for longer than 12 consecutive months unless otherwise agreed upon between CSA and the referring agency.
- Youth and/or families demonstrating three consecutive months of minimal progress unless otherwise agreed upon between CSA and the referring agency.

UR Process Details

- **Collection of Data:** The UR/CQI Specialist will perform a comprehensive review of information collected through in-person and telephonic interviews, electronic communication, and records review.

Information will be collected from the client and family, including but not limited to parent(s) and caregivers, case manager(s), relevant agencies, and current and past providers. The UR/CQI Specialist

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will obtain a comprehensive biopsychosocial history. This shall consist of academic/work, family, medical/mental health, community, leisure/recreation, spirituality, environmental, and any other relevant life domains.

- **Criteria Evaluation:** The UR/CQI Specialist will assess the appropriateness and necessity of services requested and/or provided based on established criteria and guidelines. Criteria considerations include but are not limited to:
 - Child and Adolescent Needs and Strengths (CANS)
 - Risk of harm to self and/or others
 - Prior services attempted
 - Use of evidence based practices
 - Prior services received
 - Service provision in the Least Restrictive Environment
- **Review Frequency:** UR for Congregate Care will occur monthly, DSS On Notice cases and high-service utilization community-based services will have monthly reviews with a mid-month check-in to ensure prompt service delivery and engagement.

UR/CQI Reporting Requirements

A comprehensive report will be created by the UR/CQI Specialist and provided to the FAPT, case manager, and congregate care provider. and provided to the FAPT, case manager, and congregate care provider. The report will include the following information: demographics, CSA eligibility category, diagnoses, placement history, current medications and history of medication trials, CANS review and reports on CANS longevity data, treatment goals, FAPT participation, biopsychosocial history, summary of youth and facility staff interviews, clinical documentation review, summary of family engagement, discharge plan, clinical recommendations, other clinical information relevant to the case, and CSA compliance summary. Reports will be submitted no later than one week prior to the youth's FAPT date and updated according to the frequency schedule. The UR/CQI specialist will attend FAPT meetings for all cases on the UR caseload to provide a verbal summary of clinical impressions and recommendations for service planning.

The UR/CQI Specialist will provide verbal and/or written reports to the relevant parties regarding the outcomes of UR/CQI activities and any identified areas for improvement.

Case Manager and FAPT/MDT Responsibilities

The CSA case manager and FAPT/approved alternative MDT will perform UR/CQI functions for children, youth and families who do not fall into any of the above categories. Case managers are required to bring a case through the MDT or FAPT in accordance with CPMT policy. MDT meetings cannot be held without the presence of the family. The FAPT makes every effort to include the youth and family, taking into consideration that some have attended MDTs prior to the FAPT meeting. In cases where the family does not participate, the case manager must submit a copy of the signed MDT plan with the signature page showing the parent/caregiver agreed to participate in requested services.

Initial case presentations include current and historical information, strengths and needs, services utilized in the past, provider reports (if any), evaluations (if any), a current CANS, and any other pertinent information relating to the youth and family. The team develops long and short-term goals and determines the services

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necessary to meet them. (See section 3.3.2 Family Assessment and Planning Team for detailed information regarding the structure of the FAPT meeting)

Case reviews occur at a frequency determined by the services being provided (See section 3.3.5.1 FAPT Review Frequency).

CQI Process

Data collected from UR reviews and CANS reports will be analyzed related to the delivery and outcomes of mental health services. Data will be aggregated to identify areas for enhancement in service delivery, effectiveness, and efficiency. Findings will be reported to CPMT on an annual basis or more frequently as needed.

CPMT shall consider CQI reports to implement strategies aimed at improving the quality and outcomes of services provided through CSA funding.

Review and Amendments

This UR/CQI policy will be subject to periodic review to ensure alignment with regulatory requirements and best practices. Amendments or updates will be made as necessary to enhance the effectiveness of the UR and CQI processes.

References

All references to the Code of Virginia (COV) sections §2.2-2648 D.15, §2.2-5206.13, and §2.2-5208.5, along with any other relevant statutes or regulations, shall be duly considered in the implementation and enforcement of this policy.

This policy establishes a comprehensive framework for the UR/CQI Specialist within the Frederick County CSA Office to conduct utilization reviews and continuous quality improvement for mental health services in compliance with specified regulations, ensuring efficient and effective services while maintaining a rigorous review and improvement process.

FAPT Procedures

Frederick County CPMT recognizes that children, youth and families in need of services through the CSA Office have likely experienced behavioral and/or emotional trauma. Families are often involved with multiple agencies and present with impairment in several settings. Discussing struggles within a family system at FAPT can create anxiety and shame. For that reason, it's essential to implement practices that promote a safe and open environment and encourage family engagement. Frederick County CPMT has adopted the following procedures to ensure that children, youth and families feel heard and are treated with dignity and respect throughout the process.

Case Manager Responsibilities

Initial Introduction to CSA

Upon identification of the need for services funded through the CSA Office, case managers will obtain required authorizations to release and exchange information and provide the family with general information about CSA. This information shall include the following:

- What is CSA?
 - The CSA Office provides a structure to assess the strengths and needs of children, youth, and families, recommends services appropriate to address identified needs, and determines how those services can be obtained.
 - Services funded through the CSA Office are time limited.
 - If services are funded through the CSA Office, the household will be assessed a monthly contribution toward the cost of the services.

Submit Documentation

The case manager shall complete and submit the following documents by midnight the Tuesday prior to the scheduled FAPT meeting.

- CSA Initial Referral Form
- Complete Budget Request Form
- Signed Due Process/Rights & Safeguards Acknowledgement of Receipt
- MUAI-currently the CANS
- Foster Care Prevention form (if relevant)
- CSA Eligibility Determination form

Before FAPT Meeting

Case managers shall thoroughly prepare children, youth, and families for the FAPT meeting. A minimum of 1 day prior to the meeting, the case manager shall contact the family to provide more detailed information regarding FAPT and CPMT, the meeting process, and potential outcomes. This shall include:

- The role of FAPT
 - FAPT is a team of individuals who work with youth and families from DSS, CSU, FCPS, CSB, private provider, and a community member with lived experience.
 - FAPT assesses the strengths and needs of the family and determines what resources are available to address those needs.
 - If services cannot be provided by the community, private insurance, Medicaid, or other means, FAPT determines whether the child or youth meets eligibility criteria for the CSA Office to pay for the needed services.

- FAPT makes a recommendation to CPMT to authorize funding.
 - FAPT monitors services to ensure they are meeting the needs of the service recipients.
- The role of CPMT
 - CPMT, among many responsibilities, reviews recommendations by the FAPT and decides whether to authorize funding through the CSA Office.
- What the child, youth, and family can expect
 - Each participant has a voice at the table and is encouraged to express their thoughts and/or concerns.
 - During the first meeting, a discussion will occur regarding state determined eligibility criteria and whether each criterion is met.
 - Although some discussions may be difficult to participate in, it is important to identify all the strengths and needs of the family to ensure eligibility criteria can be met and the most effective resources/services are considered. The meeting is a judgement-free environment, and the team will respect the privacy and dignity of the family.
 - The team often comes to a consensus, however there are occasions when individual members may disagree. When this happens, decisions are made by the majority of members while respecting the opinions of those who disagree. Alternative suggestions foster creative thinking and provide opportunities for consideration of more options.
- Review the Rights and Safeguards

Meeting Structure

FAPT members are responsible for ensuring required documentation is completed and meetings run on schedule. To accomplish this, members will have roles or tasks assigned to each. The team will have a timekeeper and notetaker to assist the Chair in performing all required functions. The FAPT meeting will provide for open communication and respect among each participant. To accomplish this, the following components will be included in each meeting:

Housekeeping Items

- Welcome and Introductions- FAPT Chair
 - Meeting participants will introduce themselves and provide a summary of their role in their respective agency. An introduction in this manner will provide an opportunity to better connect with the family.
- Meeting Rules- FAPT Chair
 - Family Engagement Principles- Defer to principles which will be posted.
 - Confidentiality Statement
 - Purpose of Meeting/Meeting Structure-
 - § Initial- The Chair will summarize the structure of the meeting and purpose to assess strengths and needs, eligibility, services requested, and action steps.
 - § Review- The Chair will summarize the structure of the meeting and purpose noting that continued eligibility, service goals, progress toward termination, and barriers will be reviewed.
 - § Ask participants if they have any other items they would like to add to the agenda.

Meeting Content

Once housekeeping items are completed, the Chair should guide the team through the discussion ensuring each participant has an opportunity to add to the conversation. To facilitate the flow of the meeting and convey the importance of the youth and family's voice, the Chair shall guide participants as follows:

- Initiating the Discussion
 - The Chair will ask the youth and family if they would like to start or prefer the case manager to start the meeting by explaining what circumstances led to the referral. Or, if a case review, by summarizing what has occurred since the last meeting. By giving the youth and family this choice, the team encourages a safe environment where a family can decline if they feel uncomfortable or speak if desired while starting the discussion with important contextual information.
- Gathering Information

Once the initial discussion has begun, the case manager, youth, and family should be provided the opportunity to provide information and feedback. The Chair will ensure that the following information is provided:

 - Case Manager Report

The Case Manager is responsible for presenting pertinent information to establish eligibility and a clear understanding of youth and family needs. This includes providing the following information:

 - § If review, summarize prior FAPT meeting and action steps recommended.
 - § Summarize status of action steps.
 - § Provide pertinent information and/or events that occurred since the last meeting.
 - § Summarize the family's involvement in treatment.
 - § Identify what success will look like.
 - § Note any barriers to obtaining success.
 - Youth and Family Participation

The Chair shall encourage the youth and family to provide the following information:

 - § Identify strengths of the youth and/or family.
 - § Summarize their progress toward goals.
 - § Ensure the child is given the opportunity to provide their input.
 - § Ask if they have any questions or concerns.
 - Provider Participation

The Provider shall present the following information:

 - § Service goals and measurable progress towards meeting them.
 - § Discharge plan and what the client needs to do to accomplish discharge goals.
- Review Meeting

The Chair shall summarize and complete activities to end the meeting.

 - Review service plan and action steps.
 - Ask if there are any questions.
 - Ensure each FAPT member agrees with services and action steps. The Chair should ensure individual members acknowledge acceptance or disapproval of the service plan.
 - Explain Appeals process and provide family with a copy.
 - Explain and Obtain signatures on Participation and Consent form.

OFFICE OF CHILDREN'S SERVICES

ADMINISTERING THE CHILDREN'S SERVICES ACT



PROGRESS REPORT ON THE CHILDREN'S SERVICES ACT

Biennial Report to the General Assembly, December 2023

In accordance with §2.2-2648.21, COV and Chapter 1, Item 284 (H)

The Children's Services Act (CSA, §2.2-2648 et seq) was enacted in 1993 to create a collaborative system of services and funding for at-risk youth and families.

The CSA establishes local multidisciplinary teams responsible to work with families to plan services according to each child's unique strengths and needs and to administer the community's CSA activities.

The Office of Children's Services (OCS) is the administrative entity responsible for ensuring effective and efficient implementation of the CSA across the Commonwealth.

Guiding principles for OCS include:

- Child and family directed care,
- Equitable access to quality services,
- Responsible and effective use of public funds,
- Support for effective, evidence-based practices, and
- Collaborative partnerships across state, local, public, and private stakeholders.

Code of Virginia, §2.2-2648.21. *(The State Executive Council for Children's Services) shall: Biennially publish and disseminate to members of the General Assembly and community policy and management teams a state progress report on comprehensive services to children, youth and families and a plan for such services for the next succeeding biennium. The state plan shall:*

- a. Provide a fiscal profile of current and previous years' federal and state expenditures for a comprehensive service system for children, youth and families;*
- b. Incorporate information and recommendations from local comprehensive service systems with responsibility for planning and delivering services to children, youth and families;*
- c. Identify and establish goals for comprehensive services and the estimated costs of implementing these goals, report progress toward previously identified goals and establish priorities for the coming biennium;*
- d. Report and analyze expenditures associated with children who do not receive pool funding and have emotional and behavioral problems;*
- e. Identify funding streams used to purchase services in addition to pooled, Medicaid, and Title IV-E funding; and*
- f. Include such other information or recommendations as may be necessary and appropriate for the improvement and coordinated development of the state's comprehensive services system.*

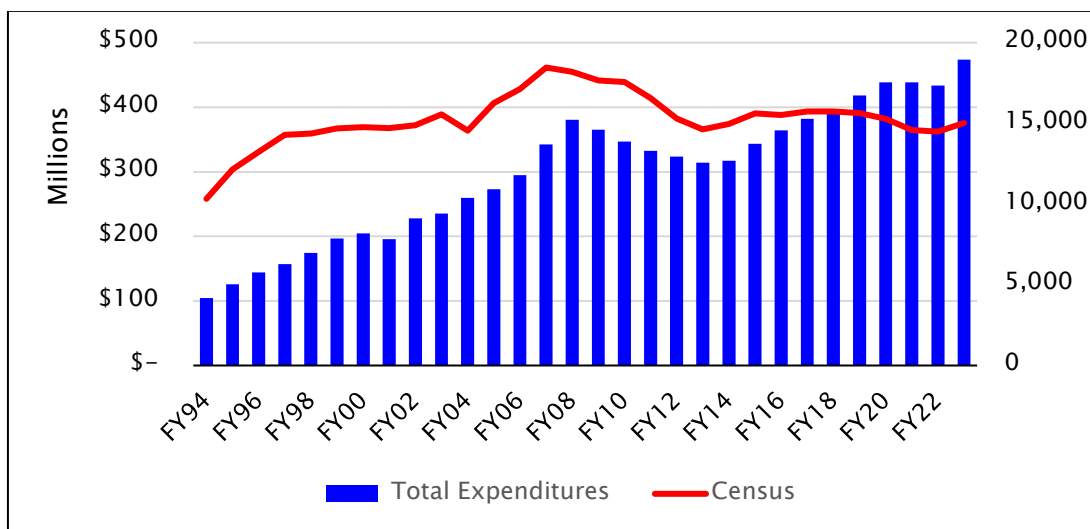
Chapter 1, Item 284. H. *Pursuant to subdivision 21 of § 2.2-2648, Code of Virginia, no later than December 20 in the odd-numbered years, the State Executive Council shall biennially publish and disseminate to members of the General Assembly and Community Policy and Management Teams a progress report on services for children, youth, and families and a plan for such services for the succeeding biennium.*

The Code of Virginia and the Appropriation Act require that the State Executive Council for Children's Services (SEC) biennially publish and disseminate a progress report on services for children, youth, and families and a plan for such services for the ensuing biennium. As the administrative entity of the Council, the Office of Children's Services (OCS) is pleased to submit the following report, approved by the SEC. The biennial Strategic Plan for 2024 - 2025 and progress in meeting the goals and objectives of the 2022 - 2023 Plan can be found in this report.



CSA Expenditures and Utilization

Total Expenditures / Children Served through the CSA, FY1994 – FY2023



Annual CSA expenditures and the number of children served rose consistently from the Act’s inception in FY1994 through FY2008. After a decline over five years (FY2009–2013) in spending and children receiving services, except for the years spanning the COVID–19 pandemic (FY2021–2022), expenditures have increased significantly. In contrast, the CSA census (number of children served) has risen slightly and has been generally stable since FY2015. In FY2023, expenditures increased by 9.2% from the three prior years, and the census increased by 3.7%. The overall increased expenditures since FY2013 are overwhelmingly due to the rise in the number (and associated costs) of children receiving private day special education placements, accounting for most of the growth in expenditures and census. In FY2023, special education expenditures rose 9.8%, while all other categories increased by 4.4%.

For the first time in several years, costs for residential (congregate care) placements rose (by 13%), and the number of youth served in these settings rose (by 4%). This data pattern appears mainly attributable to a slight increase in length of stay, an 8% increase in daily rates (primarily for education services in the residential setting), and a 10% increase in daily costs for group home placements.

State and Federal Funding Not Included in the CSA State Pool

	<u>FY2022</u>	<u>FY2023</u>
Children’s Mental Health Initiative (DBHDS)	\$ 5,648,128	\$ 5,648,128
Promoting Safe & Stable Families ¹ (DSS)	\$ 8,462,224	\$ 10,443,139
Virginia Juvenile Community Crime Control Act (DJJ)	\$10,379,921	\$10,379,921
Title IV–E (Foster Care Maintenance) ² (DSS)	\$37,183,661	\$33,786,126
Social Services Block Grant ² (DSS)	\$ 9,419,998	\$ 9,419,998
Medicaid (Treatment Foster Care, Residential Care) ³	<u>\$91,054,382</u>	<u>\$73,449,678</u>
TOTAL	\$153,694,382	\$143,126,990

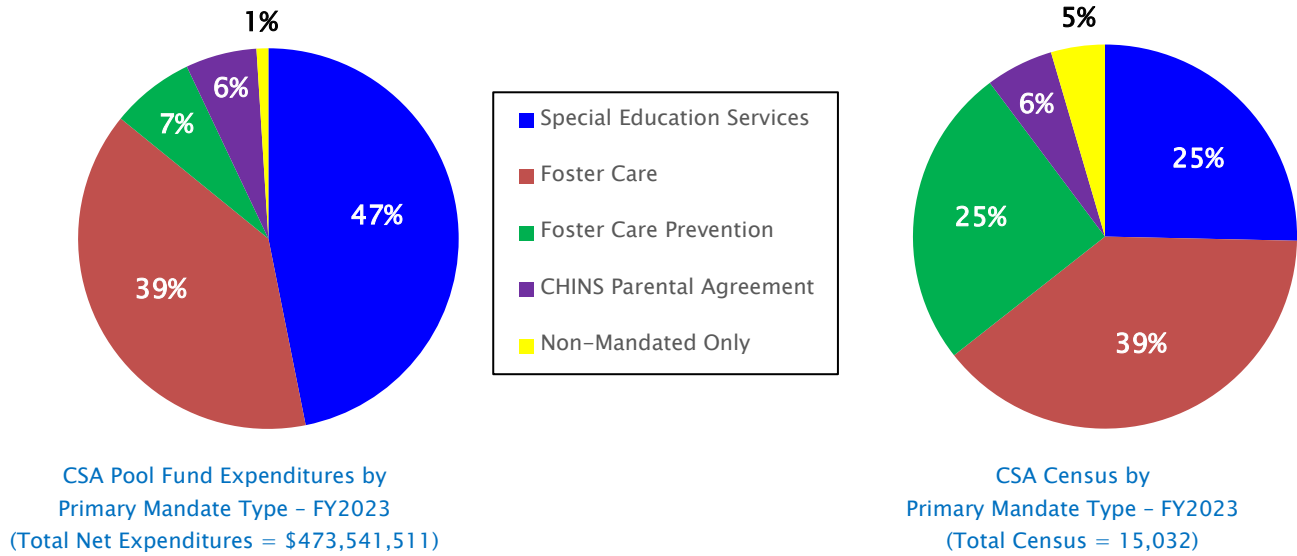
¹Federal FMAP rate varied between 61% (FY2023) and 64% (FY2024).

²Federal FMAP rate was approximately 56% through the period.

³Federal FMAP rate for Medicaid is typically 50%. Adjustments during the COVID–19 pandemic resulted in higher FMAP rates.

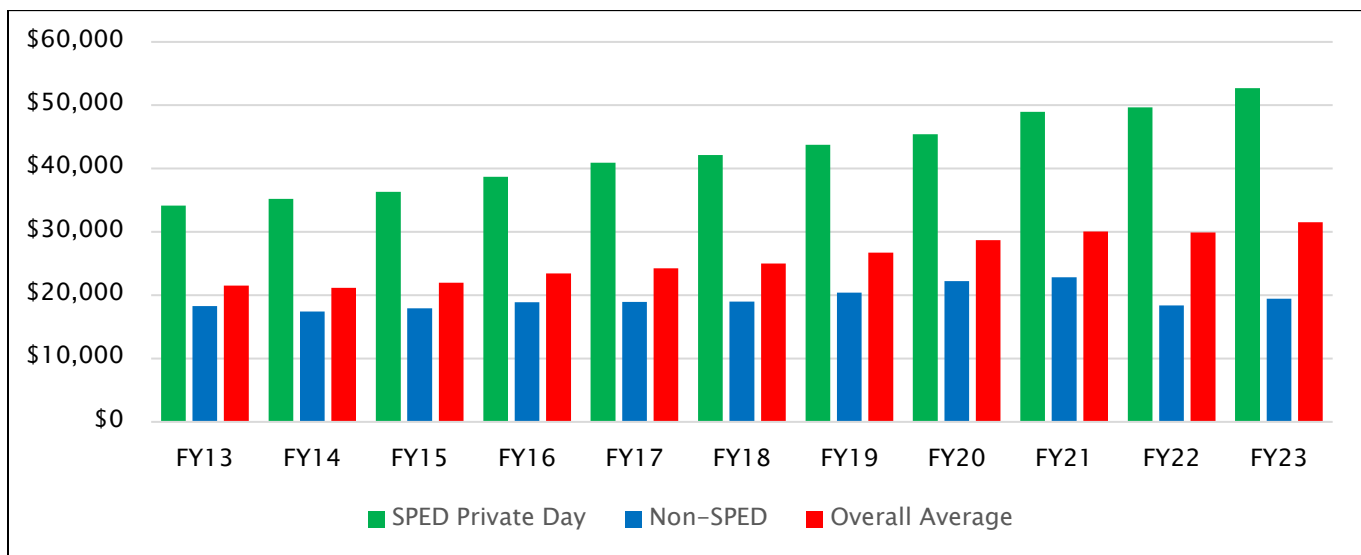
The table above reflects the contributions of funding sources other than CSA pool funds to addressing the needs of children and families⁴. These funds are “braided” with the “blended” CSA pool funds and are utilized for CSA and non-CSA-eligible youth and services, in whole or in part, when available to support needed services. Medicaid funds for behavioral health services to children other than residential and treatment foster care are not reported here and are available from the Department of Medical Assistance Services.

FY2023 CSA Expenditures and Mandate Types



The two graphs above show that special education services accounted for 47% of the total CSA expenditures in FY2023. However, children in this category accounted for only 25% of the total CSA primary mandates. (Note: Children may have more than one Primary Mandate Type). This disparity is because private day special education placements have an annual per-child cost of \$53,488 compared to an average of \$18,707 for all other categories of children (see graph below). Children eligible for CSA due to receiving foster care or foster care prevention services accounted for 64% of those eligible for CSA but only 46% of expenditures.

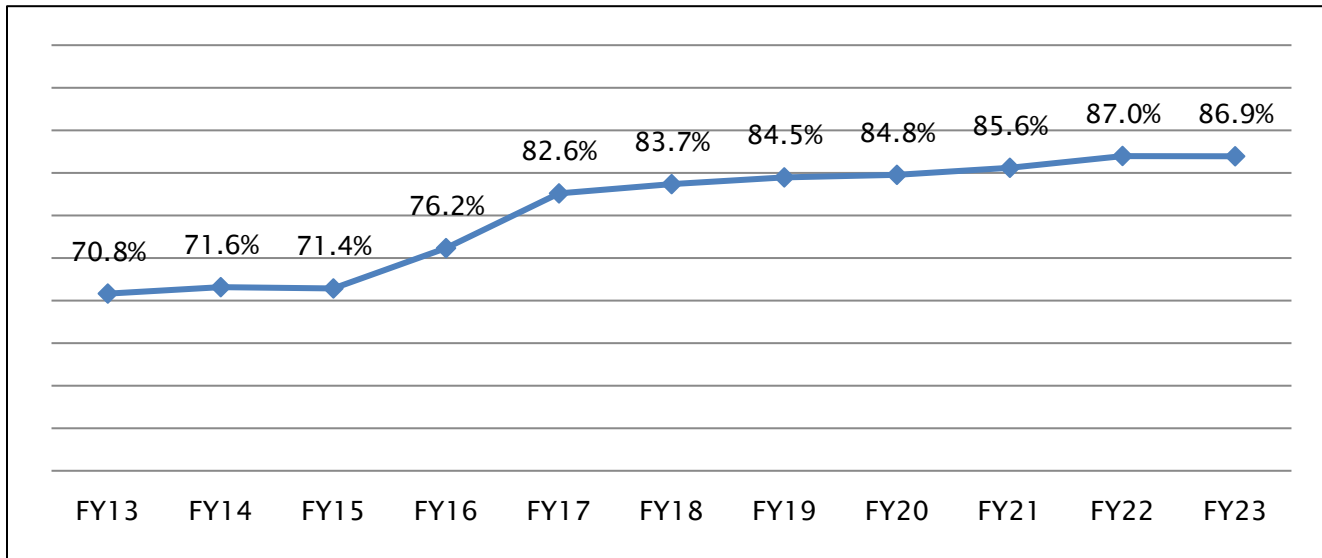
Average Annual per Child CSA Pool Fund Expenditures (FY2013 - FY2023)



⁴ Appendix A provides a description of these various funding sources.

Serving children in community-based (as opposed to residential or congregate care) settings is at the core of the CSA system of care philosophy. An extensive body of evidence indicates that long-term outcomes are improved when children are safely maintained in their families, schools, and communities. The avoidance, where possible, given clinical needs and other concerns, of placements in restrictive, congregate residential settings has long been a goal of the CSA. As seen in the chart below, performance on this indicator has continued to improve over time, although remaining essentially flat from FY2022 to FY2023.

Percent of Children Served in Community-Based Settings (FY2013 - FY2023)



Significant Accomplishments 2022 – 2023

The following is a summary of significant accomplishments related to the Goals and Objectives for the 2022 – 2023 Strategic Plan approved by the State Executive Council for Children’s Services in December 2021.

Area: Policy and Oversight

Objective 1: The SEC, with input from SLAT and others, will determine which CSA policies need greater uniformity, flexibility, and alignment (internally and across partners).

Two-year metric: Continue through the work of the SEC Policy Review Workgroup, prioritized revisions to CSA policies with an additional focus on the use of equity and trauma-informed lenses.

Status:

- *Updated and approved the Family Assessment and Planning Team policy (3.2).*
- *Revised and approved the Family Engagement Policy (3.3).*
- *Rescinded policies redundant with the Code of Virginia (2.1; 2.2; 2.3; 3.1; 4.4.1).*
- *Developed a plan for the review and update of all other existing policies.*
- *Released for public comment revisions to policies 2.4 (Public Participation in Policy-Making Actions), 3.4 (Dispute Resolution Process), and 4.2 (Payment for Services and Change of Legal Residence).*
- *Continued to consult with the State and Local Advisory Team (SLAT) and the state CSA Coordinator Network on the policy review process and content.*
- *At the request of the SEC, the SLAT reviewed the current three-tiered CSA match rate model and recommended no changes. The SEC affirmed this recommendation.*
- *CSA worked with VDSS to suspend the VDSS policy regarding the use of the Qualified Residential Treatment Program (QRTP) designation under the Family First Prevention Services Act.*
- *The Policy Review Workgroup has transitioned to collaborative efforts with the SLAT, CSA Coordinator Network, and other ad hoc members as germane to the policies under review.*

Area: Policy and Oversight

Objective 2: The SEC will identify and capitalize on the practice enhancements occurring throughout the CSA participating systems.

Two-year metric: The SEC will continue to engage in regular updates and discussions of the various system improvement initiatives to identify areas requiring additional alignment. Areas for collaboration will be identified and acted upon.

Status:

- *The SEC received a presentation on the Governor’s Safe and Sound Task Force at the June 2022 meeting. Multiple SEC agencies are involved in implementing the goals of this task force to eliminate the occurrence of youth in foster care being displaced and residing in unapproved or inappropriate placements such as local DSS offices, hotels, or hospital emergency departments.*

- *Multiple SEC agencies are involved in implementing the Governor’s Right Help, Right Now transformation of the behavioral health system.*
- *The OCS Senior Research Analyst on the OCS Data and Outcomes Dashboard and annual Service Gap Survey were made at the March 2023 and September 2023 SEC meetings. At the suggestion of the SEC, a local and regional level dashboard was added to the Service Gap Survey results.*
- *OCS has developed and implemented a topical index to its Administrative Memorandums to make it easier for users to locate relevant guidance related to the CSA program.*

Area: Leadership and Collective Action

Objective 1: The SEC and SLAT will define and support the development of core leadership competencies for local CSA leaders, Community Policy and Management Teams, and Family Assessment and Planning Teams.

Two-year metric: Develop and implement a comprehensive curriculum and related strategies to address identified core leadership and operational competencies and for building local capacity as developed by the workgroup of the State and Local Advisory Team (SLAT).

Status:

- *Multiple online courses corresponding with the Core Competencies have been developed and made available. Additional in-person training curricula continue to be offered upon request.*
- *A topical catalog of training and related resources is being developed and will be posted to the CSA website, as recommended by the SLAT.*

Area: Leadership and Collective Action

Objective 2: SEC will implement and support outcome-driven practices.

Two-year metric: OCS will complete a five-year CSA outcomes report at the state and local level and will develop and disseminate services-specific outcome reporting and tools for localities.

Status:

- *The statewide five-year outcomes report (2018–2022) is complete and has been disseminated.*
- *OCS is adding service placement type (SPT)-level data and other upgrades to its Data and Outcomes Dashboard. Several of these upgrades were suggested by the SEC and other stakeholders.*

Two-year metric: SEC member agencies will support the work of the Center for Evidence-Based Partnerships in Virginia (CEBP-Va).

Status:

- *The following SEC member agencies participate in the Governance Committee of the Center: OCS, DBHDS, VDSS, DMAS, VDH, and DJJ. Additional agency partners include the Department of Criminal Justice Services and the Department of Health Professions.*

- *The Center has several ongoing projects, including the development and maintenance of an online directory of providers who meet training and credentialing requirements for specific evidence-based interventions; fidelity monitoring for particular interventions on the Virginia Family First Prevention Services Act plan through VDSS); ongoing research and reporting on barriers and solutions to the implementation of EBPs; and the EBP Transformation Zones initiative in partnership with the National Implementation Research Network (University of North Carolina).*

Area: Empowering Families and Communities

Objective 1: SEC, SLAT, and additional partners will develop a guide for youth and families to build understanding about access to needed services.

Two-year metric: Complete development and distribution of the family and youth guide to CSA, including ancillary products (e.g., training curriculum, videos).

Status:

- *The "Family Guide to CSA" has been completed, distributed, and available on the CSA website.*
- *An online training for family representatives to Family Assessment and Planning Teams and Community Policy and Management Teams has been developed and is available through the Virginia Learning Center.*
- *A video overview of CSA for parents has been scripted and will be produced and released in early 2024.*

Area: Empowering Families and Communities

Objective 2: The SEC, through OCS, will build community capacity by preparing and assisting localities to successfully implement and sustain evidence-based practices.

Two-year metrics:

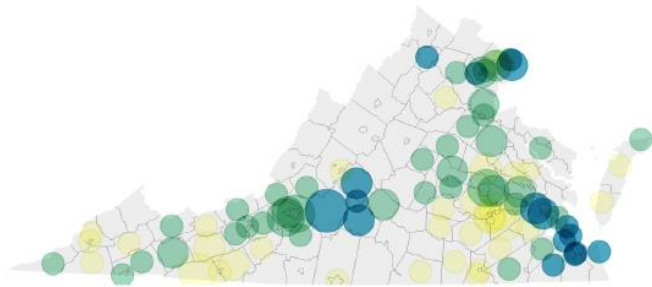
- Number of available EBPs for children/families
- Assessment of EBP availability/capacity across the Commonwealth
- Number of trained EBP providers
- Number of children/families receiving EPBs
- Number of and attendance at EBP-related training events

Status:

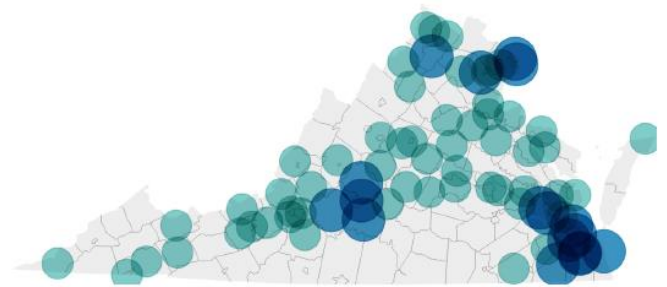
- *The following EBPs are available as of July 1, 2023 (specific supporting agencies listed):*
 - *Multisystemic therapy (MST) - (DSS, OCS, DMAS, DJJ)*
 - *Functional Family Therapy (FFT) -*
 - *Parent-Child Interaction Therapy (PCIT) - (DSS, OCS)*
 - *High-Fidelity Wraparound - Intensive Care Coordination) (HFW) - (OCS, DSS, DBHDS, DJJ)*
 - *Family Check-Up (FCU) - (DSS)*
 - *Brief Strategic Family Therapy (BSFT) - (DSS)*
 - *Homebuilders - (DSS)*
 - *Trauma-focused Cognitive Behavioral Therapy (TF-CBT) - (DBHDS)*
 - *Adolescent Community Reinforcement Approach (A-CRA) - (DBHDS)*
 - *Community Reinforcements and Family Training (CRAFT) - (DBHDS)*

- The availability of the EBPs listed and the number of trained EBP providers are not uniformly known. They may vary as qualified providers are employed or leave employment with specific agencies. The most carefully tracked EBPs are those associated with the Family First Prevention Services Act (FFPSA), including MST, FFT, FCU, BSFT, and PCIT. The providers can be found on the provider directory managed by the Center for Evidence-Based Partnerships at this location: www.EBPFinder.org. The maps below⁵ show BSFT, FCU, FFT, and MST availability.

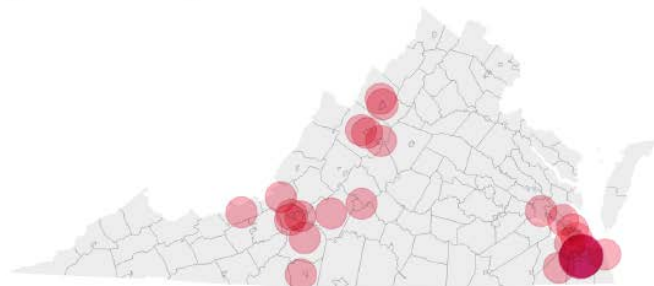
FFT Providers



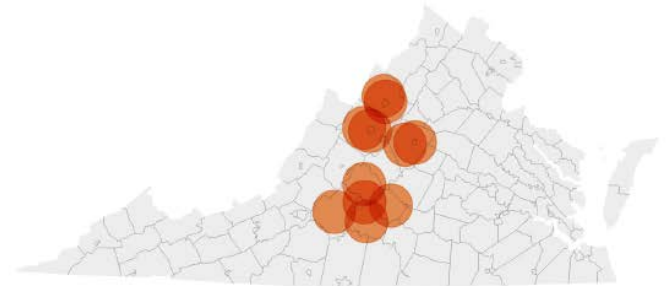
[MST Providers]



BSFT Providers

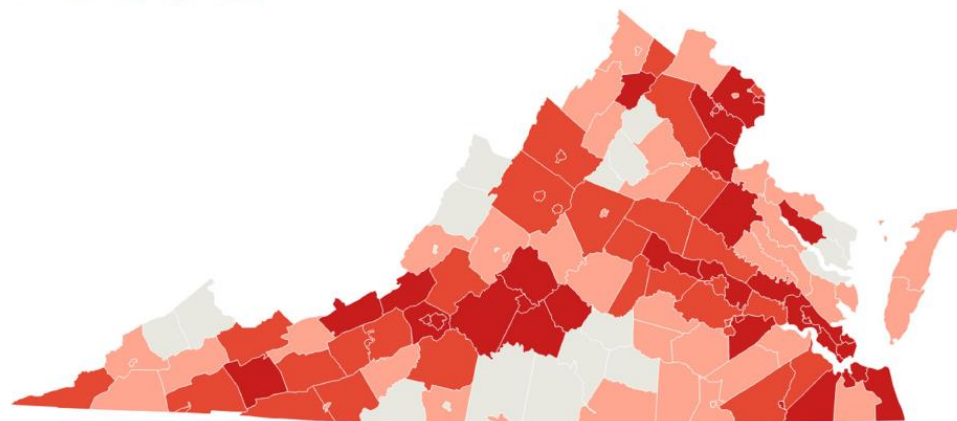


FCU Providers



EBP Saturation

Number of teams or sites, as of August 2023



⁵ Maps generated by the CEBP-VA as of August 11, 2023.

The availability of qualified High-Fidelity Wraparound providers can be found on the OCS website at www.csa.virginia.gov/Content/doc/ICC_Trained_Providers.pdf.

For the EBPs explicitly detailed in each agency’s funding model/service listings, the number of children and families served in FY2022 and FY2023 through each EBP is listed in the table below:

		Youth Served FY2022				
EBP	Funding Agencies*	DSS	OCS	DJJ	DBHDS	DMAS
Multisystemic Therapy	DSS, OCS, DJJ, DMAS	21	69	133	124	214
Functional Family Therapy	DSS, OCS, DJJ, DMAS	36	146	170	185	154
Parent-Child Interaction Therapy	DSS, OCS	0	0			
High Fidelity Wraparound (ICC)	OCS		560	25		
Adolescent Community Reinforcement Approach	DBHDS (CSB), DJJ					
Community Reinforcement and Family Training	DBHDS (CSB), DJJ					
Trauma-Focused Cognitive Behavioral Therapy	DBHDS (CSB), OCS, DJJ					
		Youth Served FY2023				
EBP	Funding Agencies*	DSS	OCS	DJJ	DBHDS	DMAS
Multisystemic Therapy	DSS, OCS, DJJ, DMAS	6	50	90		248
Functional Family Therapy	DSS, OCS, DJJ, DMAS	16	73	182		230
Parent-Child Interaction Therapy	DSS, OCS	0	6			
High Fidelity Wraparound (ICC)	OCS		635	22		
Adolescent Community Reinforcement Approach	DBHDS (CSB), DJJ					
Community Reinforcement and Family Training	DBHDS (CSB), DJJ					
Trauma-Focused Cognitive Behavioral Therapy	DBHDS (CSB), OCS, DJJ					

Note: Cells shaded in gray are not funded/reported by the specific agency.

- Data related to training is shown in the table below:

EBP Trained Practitioners	Agency Providing Training	Number Trained	Training Events
Multisystemic Therapy	DSS	5	2
Functional Family Therapy	DSS	7	3
Functional Family Therapy	DBHDS	27	10
Parent-Child Interaction Therapy	DSS	9	5
Parent-Child Interaction Therapy	DBHDS	56	19
High Fidelity Wraparound (ICC)	OCS	317	8
Adolescent Community Reinforcement Approach	DBHDS	50	9
Community Reinforcement and Family Training	DBHDS	36	2
Trauma-Focused Cognitive Behavioral Therapy	DBHDS	341	32

Note: There may be some duplication in the numbers trained as reported by different agencies may be overlapping.

Appendix A

Children's Mental Health Initiative

The Children's Mental Health Initiative (MHI) Fund was established by the General Assembly in FY 2000 to create a dedicated source of funding for mental health and substance abuse services for children and adolescents with serious emotional disturbances (SED) who are not mandated for the Children's Services Act (CSA). Funds are provided to the Community Services Boards based on a funding methodology.

Promoting Safe & Stable Families

The Virginia Department of Social Services administers the Promoting Safe and Stable Families Program (PSSF) which is designed to assist children and families resolve crises, connect with necessary and appropriate services, and remain safely together in their own homes whenever possible. This program helps more than 15,000 children and families each year. Services are provided to meet the following objectives:

- Prevent or eliminate the need for out-of-home placements of children
- Promote family strength and stability
- Enhance parental functioning
- Protect children
- Assess and make changes in state and local service delivery systems

PSSF funding is provided by the federal government with a required state match. Individual localities are allocated funds by the VDSS based on the submission of an approved plan to the VDSS. Additional information on the PSSF program can be found here: <https://www.dss.virginia.gov/family/pssf.cgi>.

Virginia Juvenile Community Crime Control Act

In 1995, the Virginia General Assembly passed the Virginia Juvenile Community Crime Control Act (VJCCCA) "to establish a community-based system of progressive intensive sanctions and services that correspond to the severity of offense and treatment needs." Administered by the Department of Juvenile Justice, all localities have access to a funding allocation to provide services to eligible youth involved in the juvenile court system. Services generally fall into the categories of public safety, post-dispositional/graduated sanctions, accountability, and competency development. Additional information on the PSSF program can be found here: <https://www.djj.virginia.gov/pages/community/community-diversion.htm#vjccca>.

Title IV-E

Title IV-E is a federal program designed to provide funding to states to ensure proper care for eligible children in foster care and to provide ongoing assistance to eligible children with special needs receiving adoption subsidies. The program is administered under Title IV-E of the Social Security Act and is funded by federal and state/local matching funds. Title IV-E funds are administered by the Virginia Department of Social Services and the local departments of social services. Additional information on Title IV-E can be found here: <https://www.dss.virginia.gov/family/iv-e.cgi>.

Social Services Block Grant

The Social Services Block Grant (SSBG) is a federal funding source that partially supports various services delivered through local departments of social services. The SSBG is administered by the Virginia Department of Social Services. Additional information on the SSBG can be found here: https://www.dss.virginia.gov/geninfo/reports/agency_wide/block_grants.cgi.

Medicaid

Medicaid is the federal program that assists states in providing health care (including behavioral health) to eligible children and adults. Medicaid funding is a shared federal and state responsibility. Medicaid funds support CSA for residential care (therapeutic group homes and psychiatric residential treatment facilities, treatment foster care case management, and various outpatient behavioral health services).

The 2024 – 2025 CSA Strategic Plan

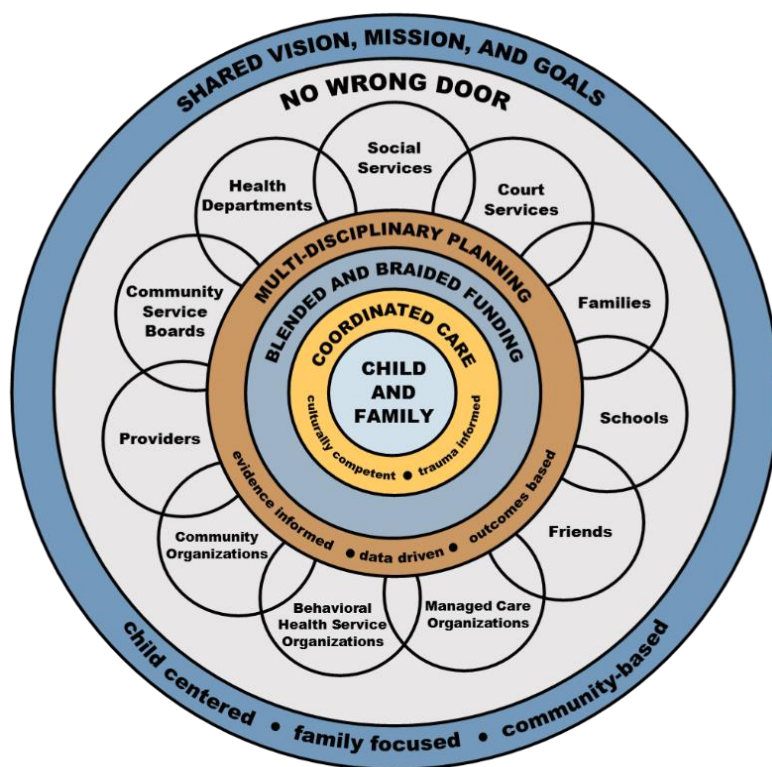
At its December 2023 meeting, the State Executive Council adopted a Strategic Plan for 2024 – 2025.

The Plan is found on the following pages.

Begin with the End in Mind . . .

By 2026, Virginia's Children's Services Act (CSA) will have worked with its state and local government partners, the provider community, and families to successfully expand and support access to effective services that meet the needs of children and families. The State Executive Council for Children's Services (SEC) and the Office of Children's Services are vital participants in this effort, providing leadership and resources to improve outcomes and operate a program that best utilizes public funds. This 2024-2026 Strategic Plan includes continued support for executing evidence-based approaches for serving youth and families by championing statewide, cross-agency initiatives. In this biennial plan, there is an increased focus on aligning policy and practice with an emphasis on creating a process by which stakeholders can provide input into the CSA policies. The empowerment of families and communities remains a focal point, with significant attention given to creating resources that build capacity and create clarity in navigating Virginia's system of care.

These goals will be realized through a collaborative system of care grounded in the CSA's founding principles, where practice reflects policy, and stakeholders at all levels embrace leadership and accountability. Strong partnerships are foundational to implementing the CSA and are the mechanism by which improved practices and outcomes are achieved.



STATE EXECUTIVE COUNCIL FOR CHILDREN'S SERVICES



STRATEGIC PLAN: 2024 – 2025

Empowering Communities to Serve Youth



POLICY & OVERSIGHT

Policy can either help or hinder alignment of shared efforts.

1. With input from the SLAT and other stakeholders, the SEC will complete a comprehensive review of the current CSA Policy Manual to allow for improved uniformity, flexibility, and alignment (internally and across partners).

Two-Year Metric: The SEC will systematically review the existing policy manual to ensure policies are uniform in format and aligned internally and with the policies and practices of CSA agency partners.

Two-Year Metric: The SEC will review current practices to ensure alignment with relevant policies.

2. The SEC will establish a process for soliciting/generating ideas for new/revised CSA policies and practices to enhance program effectiveness and efficiency.

Two-Year Metric: The SEC will work with stakeholders, including the SLAT, CSA Coordinator Network-Policy Committee, VACO, and VML, to develop a process for promoting policy revisions to enhance local CSA programs.

3. The SEC will provide oversight of local CSA programs through the receipt of regular reports on local CSA program audits and technical assistance activities, highlighting both problematic (specific localities and activities) and positive aspects (areas of excellence and innovation).

Two-Year Metric: The SEC will receive electronic notification of the publication of audits and review quarterly and annual audit summary reports prepared by the Office of Children's Services and recommend actions as appropriate.

Two-Year Metric: The SEC will receive quarterly updates on technical assistance activities.

Two-Year Metric: The SEC will develop a process to acknowledge areas of local excellence and best practices.



LEADERSHIP & COLLECTIVE ACTION

Promote alignment, leading by example, and collaborating on a shared vision and key outcomes.

1. The SEC, SLAT, and member entities will enhance the availability of and access to services for youth and families by supporting and championing statewide, cross-agency initiatives.

Two-Year Metric: The SEC and SLAT will support enhanced community capacity by supporting outcome-driven practices in localities.

Two-Year Metric: With the SLAT and OCS, the SEC will develop resources/tools to assist localities in implementing outcome-driven practices and decision-making.

Two-Year Metric: The SEC will receive updates from lead agencies to determine the most appropriate supportive actions from the SEC, the SLAT, and OCS.

Two-Year Metric: The SEC will receive annual updates on service needs assessments completed by participating agencies.

Two-Year Metric: The SEC and SLAT members should educate their respective agencies, highlighting policy issues and best practices.



EMPOWERING FAMILIES & COMMUNITIES

We honor the voices and choices of families and youth and build the capacity of the communities serving them.

1. The SEC will support family engagement and a child-centered, family-focused, trauma-informed, and community-based system of care through:

- Training and coaching by OCS and SEC member agencies on youth and family engagement for local CSA teams and other system partners.
- Continuing OCS' role as a key training partner for evidence-based and outcomes-driven practices.

Two-Year Metric: The SEC, in collaboration with the SLAT, OCS, and other stakeholders, will develop tools for youth and families, such as a family guide brochure, model intake form, and family experience video, to build understanding about access to needed services.

2. In collaboration with the SLAT and other partners, the SEC will work to increase parent participation at the state and local levels.

Two-Year Metric: The SEC and SLAT will explore the barriers and challenges to eliciting parent representation at the state and local levels and brainstorm ways to overcome these barriers.

Two-Year Metric: In collaboration with the SLAT and OCS, the SEC will support parent representative empowerment by developing focused training opportunities for parent representatives on the CPMT and FAPT.

Two-Year Metric: The SEC, in collaboration with the SLAT, OCS, and other stakeholders, will survey local CSA programs to determine how they evaluate family perceptions of and satisfaction with the CSA process.

Two-Year Metric: The SEC, in collaboration with the SLAT, OCS, and other stakeholders, will develop and disseminate a model "Youth and Family Engagement Survey" and recommend practices for gathering youth and family input from local CSA programs.

From: [Mucha, Marsha \(CSA\)](#)
To: CSA@LISTSERV.COV.VIRGINIA.GOV
Subject: "[External]"Public Comment on Proposed SEC Policies
Date: Tuesday, December 19, 2023 9:36:14 AM
Attachments: [Outlook-gy30ojr.png](#)
[SEC Policy 2.4 Revision Draft.pdf](#)
[SEC Policy 3.4 Revision Draft.pdf](#)
[SEC Policy 4.2 Revision Draft v4.pdf](#)

Good Morning -

In accordance with the State Executive Council for Children's Services (SEC) policy on public participation, the SEC at its meeting on December 14, 2023, approved the following three (3) policies for a 60 day public comment period beginning, Monday, December 18, 2023 and closing on Friday, February 16, 2024 at 5:00 p.m.

- Proposed SEC Policy 2.4, Public Participation in Policy-Making Actions
- Proposed SEC Policy 3.4, Dispute Resolution Process
- Proposed SEC Policy 4.2, Payment for Services and Change of Legal Residence

Comments will be accepted through the Policy Public Comments Form on the CSA website: csa.virginia.gov, via e-mail to csa.office@csa.virginia.gov (please use Public Comment in the subject line along with the name of the policy) or via U.S. mail or alternate courier service to: Office of Children's Services, 1604 Santa Rosa Rd., Suite 137, Richmond, VA 23229. ATTN: Public Comment.

The full texts of the proposed policies are attached to this email and can also be found in the Policy Public Comments Form on the CSA website.

Thank you for your attention.
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](tel:804-662-9815) (Office)

[804-662-9831](tel:804-662-9831) (Fax)



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POLICY 2.4

PUBLIC PARTICIPATION IN POLICY-MAKING ACTIONS

2.4.1 Purpose

The purpose of this policy is to promote public involvement in the development, amendment, or repeal of policies of the State Executive Council for Children’s Services (SEC).

2.4.2 Authority

[Section 2.2-2648](#) D 4 of the *Code of Virginia* states that the SEC shall:

“Provide for a public participation process for programmatic and fiscal guidelines and dispute resolution procedures developed for administrative actions that support the purposes of the Children’s Services Act ([§ 2.2-5200](#) et seq.). The public participation process shall include, at a minimum, 60 days of public comment and the distribution of these guidelines and procedures to all interested parties.”

[§ 2.2-2648](#) D 5 specifies that the SEC shall:

“... consult with the Virginia Municipal League and the Virginia Association of Counties about state policies governing the use, distribution, and monitoring of monies in the state pool of funds and the state trust fund.”

In addition, [§ 2.2-2648](#) enumerates specific areas in which the SEC shall be responsible for the development and implementation of guidelines and practices for the Children’s Services Act (CSA).

The Office of Children’s Services (OCS) is established pursuant to [§ 2.2-2649](#) A as the administrative entity of the SEC.

2.4.3 Definitions

“*Basic law*” means provisions in the *Code of Virginia* that delineate the basic authority and responsibilities of an agency and/or governing body.

“*Commonwealth Calendar*” means the electronic calendar for official government meetings open to the public as required by [§ 2.2-3707](#) C of the Virginia Freedom of Information Act.

“*Fiscal impact analysis*” means a systematic review of the potential fiscal impact of a proposed policy which includes an analysis of the impact on CSA state pool funds and other state funding sources, CSA local matching funds requirements, local government administration of CSA, and any potential federal funding sources.

“*Legal review*” means a review of a proposed policy by the Office of the Attorney General to ensure that the proposed policy is in compliance with all relevant state and federal laws and regulations.

“Notice Stage” means the first stage of an SEC policy development where the SEC indicates the intent to initiate a policy-making action.

“Notification list” means a list of persons, maintained by OCS, to be notified of SEC policy-making actions.

“Open meeting” means any scheduled meeting of a unit of state government empowered by an agency’s basic law to establish policies or decide cases related to a policy-making action.

“Person” means any individual, corporation, partnership, association, cooperative, limited liability company, trust, joint venture, government, political subdivision, or any other legal public or private entity and any successor, representative, agent, agency, or instrumentality thereof.

“Policy” means any requirement adopted by the SEC that governs the implementation of the CSA.

“Policy-making action” means the development, amendment, or repeal of a policy by the SEC.

“Proposed Stage” means the second stage of an SEC policy-making action where the SEC has drafted the proposed requirements for the operation of the CSA, OCS, or the SEC that is within the legal authority of the SEC under [§ 2.2-2648](#) of the *Code of Virginia* or which the SEC is directed to adopt by the General Assembly of Virginia.

“Public comment” means the mechanisms by which the SEC receives input from interested parties concerning policy-making actions.

“Public hearing” means a scheduled time at which SEC members meet to receive public comment on a policy-making action.

“Public notice” means informing the public of the policy-making activities of the SEC.

2.4.4 Notification List and Public Notice

A. Notification List

1. The OCS shall maintain a list of persons who have requested to be notified of policy-making actions being considered by the SEC.
2. Any person may request to be placed on the notification list by making a request to OCS via e-mail at csa.office@csa.virginia.gov or 804-662-9815. Notification of persons on the notification list shall be made by electronic means unless the person specifically indicates a preference for notification via First Class mail.
3. When electronic mail is returned as undeliverable on two occasions, at least 24 hours apart, that person will be deleted from the notification list. A single undeliverable message shall be insufficient cause to delete a person from the notification list.

Adopted: June 23, 2016

Effective: June 23, 2016

Revised: pending

Page 2 of 8

4. When mail delivered by First Class mail is returned as undeliverable on two occasions, that person will be deleted from the list.
5. The OCS may periodically request those persons on the notification list to indicate the desire to remain on or be deleted from the list and their preferred method of notification.
6. All members of the SEC and the State and Local Advisory Team (SLAT) ([§2.2-5201](#)), all persons registered via the CSA website rosters as chairpersons of CSA Community Policy and Management Teams (CPMT, [§2.2-5205](#)) and CSA Coordinators shall be placed on the notification list without the necessity of a specific request.

B. Additional Public Notice

1. In addition to the use of the notification list, OCS shall use the following mechanisms for informing the public of proposed policy-making actions of the SEC:
 - a. Prominent display of current information about policy-making activities of the SEC on its website at www.csa.virginia.gov. The information shall indicate the stage of the action and when the SEC is scheduled to meet to consider the policy-making action.
 - b. Include notice of policy-making activities on the published agendas of public meetings of the SEC and any related committee, work group, or task force meeting.

2.4.5 Information to be Sent to Persons on the Notification List

- A. OCS shall send to persons on the notification list, and publish on its website, the following information:
 1. A notice of intent to develop policy (Initiation of the Notice Stage),
 2. A notice of the public comment period on a proposed policy-making action, including the specific proposed policy documents and/or information on how to electronically obtain a copy of the specific proposed policy documents, and information on how to submit public comments.
- B. The failure of any person to receive any notice of any documents shall not affect the validity of any policy if approved by the SEC.

2.4.6 Public Comment

- A. In considering any policy-making action not exempted in Section 2.4.8, the SEC shall afford interested persons an opportunity to submit data, views, and arguments, either orally or in writing. Such opportunity to comment shall include an on-line public comment forum maintained on the CSA website.

1. The SEC shall provide a copy of the Notice Stage document to all persons on the Notification List as described in Section 2.4.4 A.
 2. Nothing herein shall prevent the SEC from developing and drafting policy-making actions prior to or during any opportunity it provides to the public to submit comments.
- B. The SEC shall accept public comments in writing after the issuance of public notice of a policy-making action in accordance with Section 2.4.4. Public comment in writing shall be accepted as follows:
1. For a minimum of thirty (30) calendar days following the issuance of the Notice Stage (see Section 2.4.7 B).
 2. For a minimum of sixty (60) calendar days following the preliminary approval of the proposed policy (see Section 2.4.7 C).
 3. For a minimum of sixty (60) calendar days following the approval of a re-proposed policy (see Section 2.4.7 E (1) (c)).
- C. The SEC may extend any of the comment periods listed in Section 2.4.6 B.
- D. Oral public comment on any policy-making action shall be accepted at all public meetings of the SEC and of any committee, work group, or task force established to consider the policy-making action. Notice of any open meeting shall be posted on the Commonwealth Calendar at least five (5) working days prior to the date of the meeting. The exception to this requirement is any meeting held in accordance with [§2.2-3707 D](#) of the *Code of Virginia* allowing for contemporaneous notice to be provided to participants and the public.
- E. Response to Public Comment

The OCS shall compile a summary description of and prepare a response to all public comments on the policy-making action. Such summary description shall be sent to members of the SEC and all members of the Notification List described in Section 4A, and published on the CSA website, at least five (5) business days before the meeting of the SEC at which final approval of the proposed policy will be considered.

In this summary description, the OCS shall indicate for each comment or group of comments that are of a similar nature whether the comment has been incorporated into the proposed policy or, if not, a brief explanation of the rationale for the action taken.

2.4.7 SEC Policy-making Process

- A. Petition for a Policy-making Action
1. Any person may petition the SEC to initiate a policy-making action. The petition shall state:
 - a. The petitioner's name and contact information; and

- b. The substance and purpose of the policy-making action that is requested, including reference to any applicable SEC policies and/or reference to the legal authority of the SEC to take the action requested. However, the failure of a petitioner to include the legal authority shall not preclude consideration of the petition.
 2. Petitioners shall submit a written petition to the Executive Director of the OCS. The petition shall be included in the documents provided in advance of the next scheduled meeting of the ~~Executive Committee of the SEC~~. At this meeting, ~~the Chair of the SEC, in consultation with the Executive Committee of the SEC and the Executive Director of the OCS,~~ shall determine the disposition of the petition.
 3. Disposition of such petitions may include:
 - a. Acceptance of the petition and initiation of a policy-making action.
 - b. A request for the petitioner to present the request for consideration to the full SEC.
 - c. Denial of the petition.
 4. Within ten (10) days of disposition, OCS shall notify the petitioner in writing of the disposition including the rationale for the decision if the request is denied.
 5. ~~The disposition of all petitions for policy-making will be made known to the State Executive Council at its next scheduled meeting.~~
 6. Nothing in this policy shall prohibit the OCS or the SEC from receiving information or from proceeding on its own motion for initiation of a policy-making action.
- B. Notice Stage
1. A determination to begin a policy-making action will be made by ~~the Executive Director of the OCS, in consultation with the Chair and the Executive Committee of the SEC.~~¹
 2. At a minimum, the Notice Stage shall include (i) a summary of the intended policy-making action, a statement of the basis, purpose, and substance thereof; (ii) issues to be addressed therein; and (iii) a preliminary estimate of the fiscal impact of the policy-making action on both state and local governments.
 3. Should the SEC approve the Notice Stage, it shall be issued via public notice and open for public comment as provided for in Section 2.4.6 B. The Executive Director of the OCS or designee shall be responsible for compiling, organizing, and presenting to the SEC public comments received.

¹ §2.2-2649 B 1 of the *Code of Virginia* provides that the Director of OCS shall “Develop and recommend to the state executive council programs and fiscal policies that promote and support cooperation and collaboration in the provision of services to troubled and at-risk youths and their families at the state and local levels.” Section B 2 further requires to OCS to “Develop and recommend to the Council state interagency policies governing the use, distribution and monitoring of moneys in the state pool of funds and the state trust fund.”

C. Initiation of the Proposed Stage

1. The SEC shall consider the draft of the proposed policy-making action a maximum of six (6) months after the close of the public comment period of the Notice Stage.
2. The draft shall be made available via public notice no less than five (5) days prior to the scheduled meeting of the SEC at which the draft of the proposed policy-making action will be considered. When distributing the draft, the OCS shall also provide a summary of public comments with the agency's response as provided for in Section 2.4.6 E.

D. Approval of Proposed Stage for Public Comment

1. The SEC shall consider the issuance of the proposed policy for public comment. At this time, the SEC may take one of three actions:
 - a. Approve *the* issuance of public notice of the proposed policy for a period of public comment not less than sixty (60) days.
 - b. Reject the proposed policy-making action.
 - c. Take other action to gather further information prior to proceeding on the proposed policy under 1 or 2 above. Such actions may include the appointment of an ad hoc work group, consultations with groups and/or individuals with interest in the proposed policy, or other steps the SEC may deem appropriate.

E. Proposed Stage Fiscal Impact Analysis and Legal Review

If the SEC approves the Proposed Stage, (i) the OCS shall complete a fiscal impact analysis and (ii) a legal review shall be conducted for consideration by the SEC.

1. Fiscal Impact Analysis

- a. Before taking further action on a proposed policy-making action the SEC shall consider the potential fiscal impact of the policy. The OCS, in conjunction with local government representatives, shall provide a thorough analysis of the fiscal impact of the proposed policy-making action based on the best available information.
- b. In completing the fiscal impact analysis, OCS, with the input of the SEC shall:
 - i. Convene a group of potentially impacted parties to define the parameters, sources of data, and analytic process to be utilized in completing the fiscal impact analysis. In accordance with §2.2-2648.5 of the Code of Virginia, input shall be solicited from the Virginia Municipal League (VML) and the Virginia Association of Counties (VACO). VML and VACO shall be provided a minimum of thirty (30) business days in which to provide comments. The fiscal impact analysis shall include whether there is an estimated impact on the Commonwealth, localities or other potentially impacted entities, such as private service providers and/or recipients of services and identify any parties particularly affected by the proposed policy. If no parties are particularly affected by the proposed policy, the analysis shall so state.

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Page 6 of 8

- ii. The fiscal impact analysis shall be made available via public notice no less than five (5) business days prior to the scheduled meeting of the SEC at which the proposed policy-making action will next be considered.

2. Legal Review

- a. When the proposed policy-making action is posted for public comment, the OCS shall submit the proposed policy to the Office of the Attorney General to ensure statutory authority for the proposed policy-making action.
- b. Should the legal review of the proposed policy reveal non-compliance with relevant statutes and/or regulations, the SEC shall be so informed by legal counsel and shall make such revisions in the proposed policy as are necessary.

F. Final Approval

1. No less than five (5) business days prior to the scheduled meeting of the SEC for consideration of approval of the policy-making action, the following shall be sent via public notice:
 - a. A draft of the proposed final policy with any deletions indicated with strike-through notations and any new language underlined;
 - b. A summary of all changes and the rationale for the change;
 - c. A summary of all comments received and the agency's response as provided in Section 2.4.6 E; and
 - d. The fiscal impact analysis.
2. The SEC may take one of the following actions:
 - a. Approve the proposed policy and establish an implementation or effective date;
 - b. Reject the proposed policy;
 - c. Revise the proposed policy and initiate an additional period of public comment (re-proposed policy); or
 - d. Defer final action on the proposed policy in order to gather other specific information prior to taking additional action at a future meeting.

2.4.8 Exemptions

- A. The provisions of this SEC Policy 2.4 shall not apply to policy-making actions that:
1. Consist only of changes in style or form or are corrections of technical errors in existing SEC policies;
 2. Are necessary to conform to changes in Virginia statutory law or the appropriation act where no agency discretion is involved. However, notice of such policies shall be disseminated via public notice within ninety (90) days of the law's effective date;
 3. Are required by order of any state or federal court of competent jurisdiction where no agency discretion is involved; or
 4. Are necessary to meet the requirements of federal law or regulations, provided such policies do not differ materially from those required by federal law or regulation, and the Office of the Attorney General has so determined in writing. Notice of such policies shall be disseminated via public notice not less than thirty (30) days prior to the effective date of the policy.

2.4.9 Policy Review

This policy will be subject to periodic review by the State Executive Council for Children's Services.

POLICY 3.4

DISPUTE RESOLUTION PROCESS

3.4.1 Purpose

To provide guidance to local Children's Services Act (CSA) programs regarding the processes related to the dispute resolution process for appealing administrative actions.

3.4.2 Authority

- A. Section [2.2-2648.D.4](#) of the Code of Virginia requires the State Executive Council for Children's Services (SEC) to: "Provide for a public participation process for programmatic and fiscal guidelines and dispute resolution procedures developed for administrative actions that support the purposes of the Children's Services Act (§ 2.2-5200 et seq.). The public participation process shall include, at a minimum, 60 days of public comment and the distribution of these guidelines and procedures to all interested parties."
- B. Section [2.2-2648.D.19](#) of the Code of Virginia requires the SEC to: "Establish and oversee the operation of an informal review and negotiation process with the Director of the Office of Children's Services and a formal dispute resolution procedure before the State Executive Council, which include formal notice and an appeals process, should the Director or Council find, upon a formal written finding, that a CPMT failed to comply with any provision of this Act. 'Formal notice' means the Director or Council provides a letter of notification, which communicates the Director's or the Council's finding, explains the effect of the finding, and describes the appeal process to the chief administrative officer of the local government with a copy to the chair of the CPMT. The dispute resolution procedure shall also include provisions for remediation by the CPMT, including a plan of correction recommended by the Council and submitted to the CPMT. If the Council denies reimbursement from the state pool of funds, the Council and the locality shall develop a plan of repayment."
- C. Section [2.2-2648.D.20](#) of the Code of Virginia requires the SEC to: "Deny state funding to a locality, in accordance with subdivision 19, where the CPMT fails to provide services that comply with the Children's Services Act (§ 2.2-5200 et seq.), any other state law or policy, or any federal law pertaining to the provision of any service funded in accordance with § 2.2-5211."

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Page 1 of 6

3.4.3 Definitions

“Administrative Actions” actions made by the Office of Children’s Services (OCS) on behalf of the SEC related to the failure of a Community Policy and Management Team (CPMT) to comply with the provisions of § 2.2-5200 et seq.

“Community Policy and Management Team (CPMT)” is the entity that develops, implements, and monitors the CSA local program through policy development, quality assurance, and oversight of functions.

“Formal Notice” is the provision of a letter of notification from the OCS Director or SEC that communicates the Director's or the SEC's finding, explains the effect of the finding, and describes the appeal process to the chief administrative officer of the local government with a copy to the chair of the CPMT.

“Office of Children’s Services (OCS)” is the administrative entity of the SEC responsible for ensuring that the SEC's decisions and policies are implemented per the powers and duties granted by section [2.2-2649](#) of the Code of Virginia.

“State Executive Council for Children’s Services (SEC)” is the supervisory council responsible for agency operations, including approval of requests for appropriations with the powers and duties outlined in section [2.2-2648](#) of the Code of Virginia.

3.4.4 Appealable Actions; Parties; Venue; Written Decisions

- A. Administrative actions that may be appealed through the dispute resolution process are:
 - 1. Denial, in whole or in part, by the OCS of financial reimbursement for expenditures incurred by a CPMT to COV § [2.2-2648\(D\)\(20\)](#); and
 - 2. Request by the OCS for the recoupment of prior reimbursement provided to a CPMT, pursuant to [COV § 2.2-2648\(D\)\(20\)](#).
- B. Only a CPMT can file an appeal. Appeals are not available to clients of CSA services or to any subgroup of the CPMT, including any member agency or individual member.
- C. All hearings and meetings related to appeals shall be held in the Richmond, Virginia area. Informal hearings may be held at an alternate location as agreed to by all parties.
- D. The terms of any final case decision by the OCS or the SEC Council, as signed by it, rendered at the informal or formal stages of the Appeal Process shall be served upon the CPMT by mail unless service otherwise made is duly acknowledged by them in writing. The signed originals shall remain in the custody of the OCS as public records;

Adopted: December 19, 2013

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Page 2 of 6

and they, or facsimiles thereof, together with the full record or file in every case, shall be made available for public inspection or copying except *as provided in the Virginia Freedom of Information Act COV § 2.2-3700 et seq or unless otherwise provided by state or federal law.* ~~(i) so far as the OCS may withhold the same in whole or part for the purpose of protecting individuals mentioned from personal embarrassment, obloquy, or disclosures of a private nature including statements respecting the physical, mental, moral, or financial condition of such individuals or (ii) for trade secrets or, so far as protected by other laws, other commercial or industrial information imparted in confidence.~~

- E. The CPMT shall be entitled to be represented by counsel at all hearings and meetings related to appeals.

3.4.5 Appeal Process

- A. Written finding. Upon receipt by the CPMT of a formal written notice from the Executive Director of OCS which communicates a finding by the Executive Director requiring action pursuant to subsection 3.4.1(a), and the basis for such finding, a local CPMT shall have the right to appeal such finding and action.
- B. Request for Reconsideration. Within 45 calendar days of issuance of the formal written notice from the Executive Director, a CPMT appealing such finding and action may file a written Request for Reconsideration with the Executive Director stating its intention to appeal the finding and action and the reasons why the CPMT claims the finding and action are not appropriate. If the formal written notice from the Executive Director is delivered to the CPMT by regular mail, 3 calendar days shall be added to the time in which the CPMT must respond. The Request for Reconsideration shall also include a request for the informal conference pursuant to subsection 3.4.2(c). The CPMT may waive its right to the informal conference and submit a Notice of Appeal requesting a formal hearing before the ~~SEC Council~~ pursuant to subsection 3.4.2(d). The Notice of Appeal shall include a statement of the finding and/or action by the Executive Director being appealed and a brief statement of the reasons why the CPMT claims the finding and/or action are not appropriate.
- C. Informal conference.
 - 1. The informal conference shall be held within 15 business days of the Executive Director's receipt of the Request for Reconsideration unless both parties agree in writing to hold the informal conference at a later date.

Adopted: December 19, 2013

Effective: December 19, 2013

Revised: pending

Page 3 of 6

2. The purpose of the informal conference is to allow the CPMT to present, and the Executive Director to consider, any additional facts and reasons providing the basis for the CPMT's appeal of the written findings and action by the Executive Director.
3. The CPMT shall have the right to (i) receive reasonable notice thereof, (ii) appear in person and to be represented by counsel, (iii) have other witnesses appear for the informal presentation of factual data, argument, or proof related to the matter, (iv) have notice of any contrary fact basis of information in the possession of the OCS that can be relied upon in making an adverse decision, and (v) be informed, briefly and generally in writing, of the factual or procedural basis for a decision in any case prior to the commencement of the informal conference.
4. The OCS may, in its decision, rely upon public data, documents, or information only when OCS has provided all parties with advance notice of its intent to consider such public data, documents, or information. This requirement shall not apply to OCS's reliance on administrative precedent.
5. The Executive Director shall have the right to counsel for the informal conference.
6. The CPMT shall have the right and option to submit any documentation to support its case prior to, during, and/or at any time subsequent to the informal conference and prior to the rendering of the Executive Director's written determination.
7. Within 30 business days following the conclusion of the informal conference, or the receipt by the Executive Director of all relevant documents or exhibits, whichever is later, the Executive Director shall render a final decision. The parties may agree in writing to extend this period of time.
8. In the event the Executive Director who issued the written notice of finding and action is unable to conduct the informal conference or issue a written determination following the informal conference due to sickness, disability, or termination of their official capacity with the OCS, the timeframe provisions herein shall commence from the date that either alternate OCS personnel are assigned to the matter or a new proceeding is conducted, if necessary, whichever is later. The OCS shall provide notice within five calendar days to the CPMT of any such inability or incapacity of the Executive Director that necessitates a replacement or a new proceeding.
9. The CPMT may contest the final decision of the Executive Director by submitting to the OCS a written Notice of Appeal requesting a formal hearing before the

Adopted: December 19, 2013

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Page 4 of 6

~~SEC Council~~ within 30 calendar days of the issuance of the Executive Director's final decision. If the Executive Director's final decision is delivered to the CPMT by regular mail, 3 calendar days shall be added to *the* time in which the CPMT must respond. If the OCS does not receive such a Notice of Appeal within this time period, the CPMT shall be deemed to accept the final decision of the Executive Director and shall immediately comply therewith. The Notice of Appeal shall include a statement of the finding and/or action by the Executive Director being appealed and a brief statement of the reasons why the CPMT claims the finding and/or action are not appropriate.

D. Formal hearing.

1. Within 5 business days of receipt by the Executive Director of the Notice of Appeal submitted by a CPMT, the Executive Director shall contact the CPMT chair to schedule a mutually agreeable date for the formal hearing and to establish guidelines for the receipt of documentation supporting the Notice of Appeal.
2. In all such formal proceedings all parties shall be entitled to be accompanied by and represented by counsel, to submit oral and documentary evidence and rebuttal proofs, to conduct such cross-examination as may elicit a full and fair disclosure of the facts, and to have the proceedings completed and a decision made. The burden of proof shall be upon the CPMT. The presiding officer at the proceedings may (i) administer oaths and affirmations, (ii) receive probative evidence, exclude irrelevant, immaterial, insubstantial, privileged, or repetitive proofs, rebuttal, or cross-examination, rule upon offers of proof, and oversee a verbatim recording of the evidence, (iii) hold conferences for the settlement or simplification of issues by consent, (iv) dispose of procedural requests, and (v) regulate and expedite the course of the hearing.
3. The ~~SEC Council~~ shall conduct the formal hearings and the Chair of the ~~SEC Council~~ shall serve as presiding officer. The decision of the ~~SEC Council~~ shall be final and shall be made in writing in the form of a Final Order of Disposition. The Final Order of Disposition shall include:
 - a. written findings of fact;
 - b. conclusions of law or policy;
 - c. rationale for its conclusion, including the identification of any documents or policies upon which the conclusion was made; and
 - d. the corrective action plan and/or any repayment plan.
4. Timetable for decision:

Adopted: December 19, 2013

Effective: December 19, 2013

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Page 5 of 6

- a. The decision of the ~~SEC Council~~ shall be rendered within 30 calendar days of the formal hearing. If the ~~SEC Council~~ fails to render a decision within 30 calendar days of the date of the formal hearing, the decision is deemed to be in favor of the CPMT.
- b. The provisions of subsection 4(a) notwithstanding, if a quorum of the ~~SEC Council~~ is unable to be met at the time the ~~SEC Council~~ makes its decision due to a member's sickness, disability, or termination of their official capacity with the ~~SEC Council~~, then the timeframe provisions of subsection 4(a) shall be reset and commence from the date that either new board members are assigned to the matter or a new proceeding is conducted if needed, whichever is later. The OCS shall provide notice within five business days to the CPMT of any incapacity of the ~~SEC Council~~ members that necessitates a replacement or a new proceeding.

3.4.6 Policy Review

This policy will be subject to periodic review by the State Executive Council for Children's Services.

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Page 6 of 6

POLICY 4.2

PAYMENT FOR SERVICES AND CHANGE OF LEGAL RESIDENCE

4.2.1 Purpose

To provide guidance to local Children's Services Act (CSA) programs regarding the processes related to the transfer of CSA cases upon the notification of a family's change of legal residence.

4.2.2 Authority

- A. Section [2.2-2648.D.9](#) of the Code of Virginia requires the State Executive Council to "provide administrative support and fiscal incentives for the establishment and operation of local comprehensive service systems."
- B. Section [34 CFR 300.323\(e\)](#) of the Individuals with Disabilities Education Act directs that "IEPs for children who transfer public agencies in the same State. If a child with a disability (who had an IEP that was in effect in a previous public agency in the same State) transfers to a new public agency in the same State, and enrolls in a new school within the same school year, the new public agency (in consultation with the parents) must provide FAPE to the child (including services comparable to those described in the child's IEP from the previous public agency), until the new public agency either -
 - (1) Adopts the child's IEP from the previous public agency; or
 - (2) Develops, adopts, and implements a new IEP that meets the applicable requirements in [§§300.320](#) through [300.324](#)."
- C. [8VAC20-81-120.A.2](#) of the Code of Virginia requires that "Children with disabilities who transfer between local educational agencies in Virginia or transfer from a local educational agency outside of Virginia to a local educational agency in Virginia within the same school year are subject to the following provisions. (34 CFR 300.323(e), (f), and (g))
 2. The new local educational agency shall provide a free appropriate public education to the child, including ensuring that the child has available special education and related services, in consultation with the parent(s), including services comparable to those described in the child's IEP from the previous local educational agency, until the new local educational agency either:
 - a. Adopts and implements the child's IEP from the previous local educational agency with the parent's consent; or
 - b. Conducts an evaluation, if determined necessary by the local educational agency, and develops and implements a new IEP with the parent's consent that meets the requirements in this chapter."

4.2.3 Definitions

“Community Policy and Management Team (CPMT)” is the entity that develops, implements, and monitors the CSA local program through policy development, quality assurance, and oversight of functions.

“Free appropriate public education” or “FAPE” means special education and related services that: (34 CFR 300.17) 1. Are provided at public expense, under public supervision and direction, and without charge; 2. Meet the standards of the Virginia Board of Education; 3. Include an appropriate preschool, elementary school, middle school or secondary school education in Virginia; and 4. Are provided in conformity with an individualized education program that meets the requirements of the Regulations Governing Special Education Programs for Children with Disabilities in Virginia.

“Former CPMT” is, for the purpose of this policy, the CPMT from the locality where a family resides prior to a change of address.

“Individualized Education Program” or “IEP” is a written statement for a child with a disability that is developed, reviewed, and revised in a team meeting in accordance with the Regulations Governing Special Education Programs for Children with Disabilities in Virginia. The IEP specifies the individual educational needs of the child and what special education and related services are necessary to meet the child's educational needs. (8VAC20-81-10)

“Individual Family Service Plan (IFSP)” is a plan developed during the Family Assessment and Planning Team (FAPT) process that incorporates the results of the mandatory uniform assessment, input of the youth and family, and other information to document goals, objectives, specific interventions/activities, and services recommended by the FAPT.

“Local Education Agency” or LEA means a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties as are recognized in a State as an administrative agency for its public elementary schools or secondary schools (34 CFR 303.23).

“New/Receiving CPMT” is, for the purposes of this policy, the CPMT from the locality where a family resides following a change of address.

4.2.4 Payment for Services

The CPMT jurisdiction where the child legally resides shall be responsible for payment for the services identified in the child/family's Individual Family Service Plan *for 30 calendar days after the new CPMT receives written notification of the child/family's residence in the new CPMT locality, except for private special education services as detailed in section 4.2.6. of this policy.*

4.2.5 Change of Legal Residence – Non-Special Education Services

- A. Issues of legal residence should be addressed by the legal ~~services counsel~~ assigned to the CPMT. If the child/family's legal residence changes, the following shall govern payment for services:
1. The Former CPMT is responsible for:
 - a. Providing written notification to the New/Receiving CPMT of the fact that the child/family's residence has changed *after obtaining proper consent from the parent or legal guardian(s) of the child; and*
 - b. Forwarding the child's/family's Individual Family Service Plan and other FAPT or MDT documents to the New/Receiving CPMT; ~~and~~
 - c. Informing *current* service providers of changes in the child/family's residence; ~~and~~
 - d. ~~The former CPMT jurisdiction pays~~ *Paying* for services for 30 calendar days after the New/Receiving CPMT receives written notification of the child/family's change of residence.
 2. ~~When the residence of the child/family transfers to a new CPMT jurisdiction, The New/Receiving CPMT must review~~ *is responsible for* reviewing the current IFSP and adopting (or revising) and implementing the IFSP within 30 calendar *days of written receipt of the notification of the child/family's residence in their locality.*
 3. CPMT jurisdictions are encouraged to:
 - a. Keep track of the child/family's residence status;
 - b. Notify New/*Receiving* Community Policy and Management Teams as soon as they know of the child/family's pending move to facilitate planning; and
 - c. To work cooperatively to resolve issues related to legal residence.

4.2.6 Change of Legal Residence – Private Special Education Placements

- A. *Issues of legal residence should be addressed by the legal counsel assigned to the CPMT/Local Education Agency. If the child/family’s legal residence changes, the following shall govern payment for services:*
1. *The Former CPMT is responsible for:*
 - a. *Providing written notification to the New/Receiving CPMT of the fact that the child/family’s residence has changed;*
 - b. *Forwarding child’s/family’s IEP/Individual Family Service Plan and other FAPT or MDT documents to the New/Receiving CPMT jurisdiction;*
 - c. *Informing private special education service providers of changes in the child/family’s residence; and*
 - d. *Fund educational services until the student no longer resides within the jurisdiction of the prior Local Education Agency.*
 2. *CPMTs are encouraged to:*
 - a. *Include language in their contracts with private special education providers indicating that they (the local CSA program) are responsible for payment for such services only while the student is a resident of that jurisdiction.*
 - b. *Notify, in writing, the parents of students receiving private special education services, that if the parent relocates to another jurisdiction, responsibility for their child’s IEP falls to their new jurisdiction of residence and they need to immediately enroll their child in the Local Education Agency where they now reside.*
 3. *The New/Receiving CPMT is responsible for:*
 - a. *Notifying their Local Education Agency that a student has transferred into their locality; and*
 - b. *Begin funding educational services when the student resides within in the new school division.*
 4. *CPMT jurisdictions are encouraged to:*
 - a. *Keep track of the child/family’s residence status;*
 - b. *Notify New/Receiving Community Policy and Management Teams as soon as they know of the child/family’s pending move to facilitate planning; and*

- c. *To work cooperatively to resolve issues related to legal residence.*

4.2.7 Policy Review

This policy will be subject to periodic review by the State Executive Council for Children's Services.

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