

Use of CSA Pool Funds

Localities throughout Virginia are attempting to develop a broader array of community-based services, and are looking to CSA pool funds to assist in the effort. The following pages attempt to answer some of the questions that have arisen about such uses of CSA funds in a straightforward, user-friendly format. Localities can rely on the responses that are provided: these represent OCS's interpretation of CSA policy on each question. However, we are aware that there are other questions we have not heard yet. A process for developing answers to questions in addition to developing guidance and "how to" documents has been established, so please contact your CSA Coordinator or OCS directly to let us know your questions and concerns.

The requirements of the CSA statute are of course the starting point for answers any questions about the use of CSA funds. The following is a reminder of what the statute requires.

By statute, all services funded through CSA pool must be:

- For the support of children who meet the specific criteria set out in statute (Virginia Code 2.2-5212) and their families.
- Approved through the local FAPT and CPMT process.
- Nonduplicative of other funding sources (i.e. the FAPT and CPMT has determined that the service is beyond the scope of other existing programs and/or cannot be funded at that time for that child or family using other program funds).
- Paid on a discrete unit-of-service basis.
- Clearly and demonstrably related to IFSP goals of one of one or more identified CSA-eligible children.

Statute also encourages localities to use CSA pool funds to pay for services that are to the maximum extent feasible:

- Directed at preventing unnecessary use of out-of-home placements,
- Delivered in the least restrictive environment, and
- Identified through the decision-making process that includes youth; birth parents; other family and extended family members; and foster, pre-adoptive or adoptive parents or relative custodians as appropriate.

By statute, local CPMTs are responsible for developing and administering structured processes to ensure that these administered requirements are satisfied. CPMTs are further responsible for adopting policies to prevent duplicate payments for the same unit of service, and to comply with state and local laws concerning conflict of interest. OCS, under the authority of SEC, is responsible for reviewing the adequacy and efficiency of those processes, and for monitoring each community's compliance with its own process. OCS is further responsible for providing localities with guidance and recommended practice information to local CPMTs to aid them in developing, refining and continuously improving the CSA administrative practices.

More specific information related to statute or CSA policy may be found at csa.virginia.gov.

Questions and Answers Use of CSA Pool Funds

- 1. Can CSA dollars be used to pay for support services for family members (for example, drug treatment for mom or dad)?**

Throughout CSA policy it is clear that the intention of the act was to design a collaborative system of services to create opportunities for wholeness, wellness and stabilization for at risk and troubled youth **and** their families. This mission is further defined in CSA policy section 9.1, as well as section 9.2.1, where it is clear that “pool funds can be used to provide services to children/youth and their families...”. CSA policy section 9.3.3 describes the locality’s ability to develop services (including those contracted) for specifically identified youth and their families. There is not a section of policy or attachments that doesn’t always connect children or youth to their families. Appendix C of the CSA manual – Attachment D Description of Wrap Services, includes a “wrap service list” by category where family services are highlighted and include Parent Education and Family Support as well as Family and Parent Counseling.

- 2. Can CSA dollars be used for one time expenses necessary to get a child back in the home?**

CSA policy Appendix H: Foster Care Prevention Guidelines states that “prevention services are designed to strengthen the family’s ability to function more effectively and independently in order to prevent family breakup **and to reunite as soon as possible if a breakup is necessary.**” It goes on to state that the family is the best environment for raising children and because of such, the family **must** be able to provide the necessary nurture, protection, shelter, and education for its members. Examples of Service Provision is clearly defined in Appendix H, but the guidelines state that “**any** service may be purchased to prevent foster care placement and/or to stabilize the family situation, **provided the need** for the service is documented in the (FAPT’s) Individual Family Service Plan (IFSP)” and authorized by the CPMT. The guidelines references emergency shelter, home management, rent and utilities, and housing as examples. Neither CSA statute nor the CSA Policy Manual prohibits the use of CSA pool funds to pay for one-time expenses.

- 3. Can CSA dollars be used to support services provided by public child serving agencies?**

Section 9.3.2, Private/Public Provider Purchases states that “all potential service providers (public and private) have the opportunity to present service options and are encouraged to develop needed services in a cost effective manner. Pool Funds may be used to purchase services from public or private agencies, provided such purchase arrangements are consistent with existing mandates and do not supplant current funding.” Public providers are held to the same standards that private providers are held to,

including service fee directory listing (9.3.5), and rate setting (9.3.5b). Section 9.3.3 allows localities to develop services and be reimbursed as long as the services purchased are for specifically identified youth and their families. Section 9.4 Restrictions on Pool Fund Usage gives clear policy guidance on what things are **limited** from pool fund reimbursement, to include administrative costs to support the CPMT or FAPT, the Interagency Coordinator's (CSA Coordinator's) salary, the supplanting of funds, and case management responsibility related to administering the Comprehensive Services Act by the FAPT or specific agency case management within the "agency's scope of responsibility." The case management section 9.4.4 goes on to state that case management services that are **beyond** each agency's scope of responsibility, that is provided directly to the child and family, and that adds **demonstrated** value necessary to meet **child-specific needs may** be purchased with pool funds. It is critical that localities have a clear understanding of what is the scope of responsibility for each agency so that CSA pool funds will not be misused or under utilized.

4. **Can CSA dollars be used for start up or pooled together to build a program or service that is still individually based?**

CSA dollars may be used to "start up" services or pooled together to build capacity for a program or service **as long as** the service/program is purchased for specifically **identified** youth and their families. The CSA policy supports service development to meet the needs of children and their families and to ensure cost effectiveness.

Localities (CPMT) must "demonstrate that each expenditure of pool funds by CPMT was made on behalf of a specific child or list of children" (policy section 10.6 Fund Audit). It is critical that CPMTs complete a service gap assessment of it's locality to determine (based on individual and collective need) what types of services would be necessary. When you complete an assessment of your existing services, your satisfaction with those services, how many youth and families are receiving or in need of such services, a locality can then begin to project which youth and families would benefit from the "new" service.