Can CSA Pay?
Can CSA Pay?

• It is not guess-work or magic.

• It is based upon requirements established by the Comprehensive Services Act.

• Apply the requirements to determine the answer.
DETERMINING IF CSA CAN PAY

Is youth eligible for Pool Funds?

- YES
  - Is service the responsibility of another agency?
    - YES
      - CSA CANNOT PAY
    - NO
      - Is service eligible for another funding source?
        - YES
          - CSA CANNOT PAY
        - NO
          - Has FAPT recommended the service and developed IFSI?
            - FAPT exempt/IEP services and foster care maintenance
              - NO
                - CSA CANNOT PAY
              - YES
                - Has CPMT authorized funding?
                  - NO
                    - CSA CANNOT PAY
                  - YES
                    - Does service meet all requirements per federal and state laws, regulations, and policies?
                      - NO
                        - CSA CANNOT PAY
                      - YES
                        - CSA CAN PAY
Is youth eligible for Pool Funds?

The Code of Virginia and policies of the State Executive Council establish eligibility for Pool Funds.
Determining if CSA Can Pay

- Is youth eligible for Pool Funds?
  - NO: CSA CANNOT PAY
  - YES: CSA CAN PAY

- Is service the responsibility of another agency?
  - NO: CSA CANNOT PAY
  - YES: CSA CANNOT PAY

- Is service eligible for another funding source?
  - NO: CSA CANNOT PAY
  - YES: CSA CANNOT PAY

- Has FAPT recommended the service and developed IFSP?
  - NO: CSA CANNOT PAY
  - YES: CSA CANNOT PAY

- Has CPMT authorized funding?
  - NO: CSA CANNOT PAY
  - YES: CSA CANNOT PAY

- Does service meet all requirements per federal and state laws, regulations, and policies?
  - NO: CSA CANNOT PAY
  - YES: CSA CAN PAY
Is service the responsibility of another agency?

Code of Virginia §2.2-5211D:

“The community services board, the local school division, local social services agency, court service unit or Department of Juvenile Justice shall continue to be responsible for providing services identified in individual family service plans that are within the agency's scope of responsibility and that are funded separately from the state pool.”
Determining if CSA can pay

1. Is youth eligible for Pool Funds?
   - No: CSA cannot pay
   - Yes:
      1. Is service the responsibility of another agency?
         - Yes: CSA cannot pay
         - No: Is service eligible for another funding source?
            - Yes: CSA cannot pay
            - No:
               1. Has FAPT recommended the service and developed IFSP?
                  - Yes: Has CPMT authorized funding?
                    - Yes:
                     1. Does service meet all requirements per federal and state laws, regulations, and policies?
                        - Yes: CSA can pay
                        - No: CSA cannot pay
                    - No: CSA cannot pay
                  - No: CSA cannot pay
Is service eligible for another funding source?

SEC Policy – 4.4 Restrictions on Pool Funds

“Pool Funds cannot be used to supplant federal or state funds supporting existing programs.”

Appropriations Act Item 274 E.

“Community Policy and Management Teams shall use Medicaid-funded services whenever they are available for the appropriate treatment of children and youth receiving services under the Comprehensive Services Act for At-Risk Children and Youth. Effective July 1, 2009, pool funds shall not be spent for any service that can be funded through Medicaid for Medicaid-eligible children and youth except when Medicaid-funded services are unavailable or inappropriate for meeting the needs of a child.”
DETERMINING IF CSA CAN PAY

Is youth eligible for Pool Funds?

YES

Is service the responsibility of another agency?

YES

service eligible for another funding source?

YES

Has FAPT recommended the service and developed IFSP?

FAPT exempt: IEP services and foster care maintenance

NO

CSA CAN PAY

NO

CSA CANNOT PAY

NO

CSA CANNOT PAY

NO

CSA CANNOT PAY

NO

CSA CANNOT PAY

NO

CSA CANNOT PAY

YES

Has CPMT authorized funding?

YES

Does service meet all requirements per federal and state laws, regulations, and policies?

YES

CSA CAN PAY

NO

CSA CANNOT PAY
Has FAPT recommended the service and developed IFSP?

FAPT exempt: IEP services and foster care maintenance

Code of Virginia § 2.2-5209

... all youth and families for which CSA-funded treatment services are requested are to be assessed by the family assessment and planning team or an approved collaborative, multidisciplinary team process and shall consider the criteria set out in subdivisions A 1 and A 2 of § 2.2-5212. Except for cases involving only the payment of foster care maintenance that shall be at the discretion of the local community policy and management team, cases for which service plans are developed outside of this family assessment and planning team process or approved collaborative, multidisciplinary team process shall not be eligible for state pool funds.

Office of the Attorney General

IEP services are not treatment services. The IEP is not a “service plan.” IEP services are exempt from 2.2-5209.
DETERMINING IF CSA CAN PAY

- Is youth eligible for Pool Funds?
  - NO: CSA CANNOT PAY
  - YES: Is service the responsibility of another agency?
    - NO: Is service eligible for another funding source?
      - NO: Has FAPT recommended the service and developed IFSP?
        - NO: CSA CANNOT PAY
        - YES: Has CPMT authorized funding?
          - NO: CSA CANNOT PAY
          - YES: Does service meet all requirements per federal and state laws, regulations, and policies?
            - NO: CSA CANNOT PAY
            - YES: CSA CAN PAY
Has CPMT authorized funding?

Code of Virginia §2.2-5206 – Powers and Duties of CPMT

"Authorize and monitor the expenditure of funds by each family assessment and planning team or a collaborative, multidisciplinary team process approved by the Council"
DETERMINING IF CSA CAN PAY

Is youth eligible for Pool Funds?
- NO: CSA CANNOT PAY
- YES:
  Is service the responsibility of another agency?
  - YES: CSA CANNOT PAY
  - NO:
    Is service eligible for another funding source?
    - YES: CSA CANNOT PAY
    - NO:
      Has FAPT recommended the service and developed IFSP?
      FAPT exempt, IEP services and foster care maintenance
      - NO: CSA CANNOT PAY
      - YES:
        Has CPMT authorized funding?
        - NO: CSA CANNOT PAY
        - YES:
          Does service meet all requirements per federal and state laws, regulations, and policies?
          - NO: CSA CANNOT PAY
          - YES: CSA CAN PAY
Does service meet requirements of all federal and state laws, regulations, and policies?

**Code of Virginia §2.2-2648**

The State Executive Council shall have the power and duty to deny state funding to a locality “where the CPMT fails to provide services that comply with the Comprehensive 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.”
Determining if CSA Can Pay

- Is youth eligible for pool funds? [NO → CSA CANNOT PAY]
- Is service the responsibility of another agency? [YES → CSA CANNOT PAY]
- Is service eligible for another funding source? [YES → CSA CANNOT PAY]
- Has FAPT recommended the service and developed IFSP? [NO → CSA CANNOT PAY]
  - FAPT exempt: IEP services and foster care maintenance [YES →]
  - Has CPMT authorized funding? [NO → CSA CANNOT PAY]
    - Does service meet all requirements per federal and state laws, regulations, and policies? [NO → CSA CANNOT PAY]
- CSA CAN PAY
Serving youth and families

1. Establish that CSA can pay

2. Be confident in designing the unique services necessary to meet the needs of each youth