

Arizona Department of Child Safety

Foster Home Recruitment, Licensure, Use, and Retention

Department engages in recommended recruitment practices but foster parent feedback indicates a need for improved customer service and more information about children

Special Report

September 2019

Report 19-113

A Report to the Arizona Legislature

Lindsey A. Perry
Auditor General





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September 30, 2019

Members of the Arizona Legislature

The Honorable Doug Ducey, Governor

Mr. Michael Faust, Director
Arizona Department of Child Safety

Transmitted herewith is the Auditor General's report, *A Special Report of the Arizona Department of Child Safety—Foster Home Recruitment, Licensure, Use, and Retention*. This report is in response to Laws 2017, Ch. 311, §4, and was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1279.03. I am also transmitting within this report a copy of the Report Highlights to provide a quick summary for your convenience.

As outlined in its response, the Arizona Department of Child Safety agrees with all the findings and plans to implement all the recommendations.

My staff and I will be pleased to discuss or clarify items in the report.

Sincerely,

Lindsey Perry, CPA, CFE
Auditor General



Arizona Department of Child Safety Foster Home Recruitment, Licensure, Use, and Retention

CONCLUSION: The Arizona Department of Child Safety (Department) maintains a supply of licensed family foster homes (foster homes) to provide care for children who have been removed from their homes because of alleged abuse or neglect. Foster homes care for a considerable portion of Arizona's children in out-of-home care. According to a Department report, over 5,500, or 41 percent, of these children ages 0 to 17 were placed in foster homes as of June 30, 2019. The Department contracts with multiple agencies (contractors) to help recruit and support foster homes, and new contracts were awarded effective September 1, 2019. Prospective foster homes must meet several requirements to become licensed, and the Department's licensing standards are generally consistent with model standards. Additionally, the Department reported placing over 40 percent of children in out-of-home care in foster homes during fiscal years 2018 and 2019, although federal fiscal year 2017 data indicates the Department used foster homes to a lesser extent when compared nationally. The Department has also engaged in recommended foster home recruitment practices and estimates needing additional foster homes for certain groups of children, such as teenagers and large sibling groups. However, feedback provided by foster parents over several years has consistently indicated a need for improved Department customer service and more information about children in their care. In addition, we identified inadequate intake practices that could impede foster home recruitment efforts. Finally, the Department should continue improving its contract monitoring approach.

Department's licensing standards are generally consistent with model standards, and Department has engaged in recommended foster home recruitment practices

State law requires the Department to license foster homes, and prospective foster homes must meet several requirements to become licensed, including completing pre-service training, undergoing various background checks and assessments, and passing a life-safety inspection of their home. We found that the Department's licensing standards are generally consistent with model standards from the U.S. Department of Health and Human Services and the National Association for Regulatory Administration. According to Department data, 3,969 foster homes were licensed as of June 30, 2019, with a total capacity of almost 9,000 beds.

The Department reported placing approximately 41 to 43 percent of children in out-of-home care in foster homes during fiscal years 2018 and 2019. According to federal data for federal fiscal year 2017, the most recent year for which this data is available, Arizona placed children in nonrelative foster homes to a lesser extent when compared nationally; however, it placed children with relatives to a greater extent. According to State law, placement with a relative is preferred to placement in a foster home.

Additionally, the Department carries out common foster home recruitment strategies, including general and targeted recruitment, and requires its contractors to recruit foster homes that meet the needs of children in its care. The Department also requires its contractors to guide prospective foster parents through the licensure process, and it tracks and has set targets for the number of individuals at specific stages of this process. Contractors are also required to provide multiple supports to foster parents.

Consistent with best practice, the Department uses data to estimate its foster home recruitment needs and estimates needing additional foster homes for teenagers, large sibling groups, and children with special health care needs. According to a 2018 U.S. Government Accountability Office report, nearly all states have reported difficulties recruiting foster homes for these groups of children. The Department also estimated needing additional foster homes of specific ethnicities/races. Children might be placed in a more restrictive or less ideal setting when a foster home that can meet their needs is not identified.

Foster parent feedback consistently indicated a need for improved Department customer service and more information about children in their care

According to best practice literature, foster parents who are content in their fostering experience are the best recruiters of new foster parents; conversely, foster parents who are discontent and spread negative word of mouth about fostering dissuade others from becoming foster parents. We reviewed Department efforts to obtain foster parents' feedback from 2014 through 2018 and conducted our own focus groups with current and former foster parents. Through these efforts, foster parents have consistently identified Department customer service as an area for improvement. For example, foster parents have consistently reported poor communication from Department staff and lack of support during transitions of children from their homes. Foster parents have also reported feeling excluded from decisions about children in their care, difficulty accessing needed supports, and pressure to accept foster placements.

Customer service in child welfare—Customers' perceptions of the way they are treated, the responsiveness of the services provided, and the extent to which they are engaged in teamwork to meet the needs of children and youth.

Foster parents have also consistently identified a need for more information about children in their care. Statute requires the Department to provide specific written information to foster parents about children who are placed with them, and the Department's policy is to provide this information through a written placement packet. However, foster parents have consistently reported that the information they receive is incomplete or inadequate. The Department's contractors and the Arizona Ombudsman-Citizen's Aide Office reported similar concerns. We also noted that some information was missing from 6 placement packets we reviewed.

Recommendations

The Department should:

- Develop and implement a customer service model to improve foster parent recruitment and retention.
- Provide foster parents with complete, updated written placement packet information.

Inadequate intake practices could impede foster home recruitment efforts, and Department monitoring of prior contracts did not ensure contractors fulfilled several requirements

The Department and its contractors share responsibility for handling phone inquiries from prospective foster parents, referred to as intake. Best practice guidance indicates that intake should be timely, welcoming, and accommodate non-English-speaking callers. We called the Department and 10 contractors in English and Spanish to evaluate their intake practices and experienced difficulty reaching several contractors because of busy phone lines and full voicemail boxes, unreturned phone calls from some contractors and the Department, and contractors who did not speak Spanish or who did not invite us to an orientation in response to our calls in Spanish. In addition, we reviewed 10 contractors' websites to see if they provided Spanish-language information and assistance on their websites, which they are required to do, and noted that only 2 of the 10 contractors did so. The experiences we had in making these calls, particularly the Spanish-speaking calls, could deter some prospective foster parents from pursuing licensure because of never being called back or not feeling welcomed. The Department reported that it had not monitored its contractors' or its own intake practices but developed strategies to improve intake as a result of our calls.

Although the Department has performed some contract monitoring for its contracts ending October 30, 2019, this is one of several core contractor responsibilities the Department did not monitor. For its new contracts effective September 1, 2019, the Department has begun to apply an active contract management (ACM) approach.

Recommendations

The Department should:

- Develop and implement procedures to ensure contractors and Department staff adequately handle intake in English and Spanish.
- Ensure contractors maintain websites with information about how to become a foster parent in Spanish.
- Continue implementing ACM for its new contracts.



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Intake is an important recruitment responsibility shared by Department and its contractors

Best practices specify that intake should be timely, welcoming, and linguistically appropriate

Department and contractor intake practices were mixed for our English-speaking phone calls and poor for our Spanish-speaking phone calls, including unreturned calls and no Spanish speakers

Poor intake calls, like those we experienced, could impede foster home recruitment efforts

Department did not monitor intake practices but has developed strategies to improve intake

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As required by Laws 2017, Ch. 311, §4, the Office of the Auditor General has completed a special report of the Arizona Department of Child Safety’s (Department) practices for recruiting, licensing, using, and retaining foster parents.

Department’s primary purpose is to protect children

The Department was established in 2014 with the primary purpose of protecting children by:

- Investigating reports of abuse and neglect.
- Assessing, promoting, and supporting children’s safety in safe and stable families or other appropriate placements in response to allegations of abuse or neglect.
- Working cooperatively with law enforcement regarding alleged criminal conduct.
- Without compromising child safety, coordinating services to achieve and maintain permanency on a child’s behalf; strengthening families; and providing prevention, intervention, and treatment services.¹

Department’s mission:

“Successfully engage children and families to ensure safety, strengthen families, and achieve permanency.”

Source: Auditor General staff review of the Department’s website.

Licensed foster care is an important placement option for children in out-of-home care

Licensed foster care provides care for children who have been removed from their homes for alleged abuse or neglect until they can be reunited with their parent(s) or another permanency goal, such as adoption or guardianship, is achieved. State law and Department policy require the Department to place children in out-of-home care in the least restrictive setting available, consistent with the best interests of the child. According to Arizona Revised Statutes (A.R.S.) §8-514(B), the order of preference for placing a child in out-of-home care is (1) with a parent; (2) with a grandparent; (3) in kinship care with another member of the child’s extended family, including a person who has a significant relationship with the child; (4) in licensed family foster care; (5) in therapeutic foster care; (6) in a group home; and (7) in a residential treatment facility.

According to information from the Department’s licensing database, the Department had 3,969 licensed foster homes, including 804 licensed kinship foster homes, as of June 30, 2019. These homes had a total capacity of 8,937 beds.

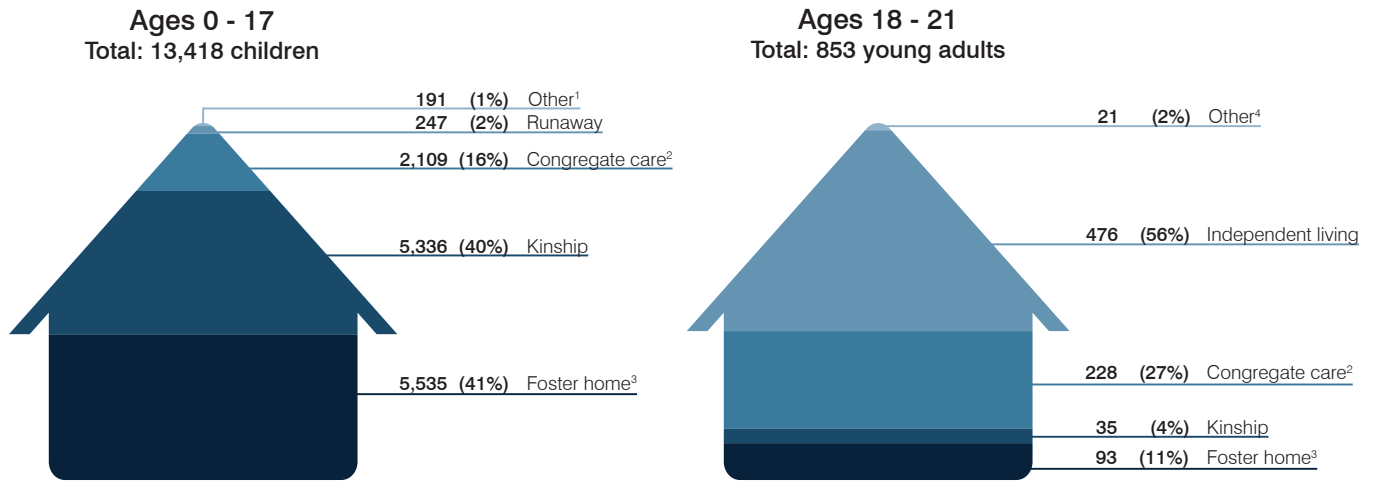
Licensed foster homes care for a considerable portion of Arizona’s children in out-of-home care. According to a Department report, over 5,500, or 41 percent, of these children ages 0 to 17 were placed in licensed family foster homes as of June 30, 2019 (see Figure 1, page 2).² Additionally, nearly 100 young adults ages 18 to 21 in Department custody were also placed in foster homes.³

¹ Prior to its establishment, the Department was formerly the Division of Children, Youth and Families within the Arizona Department of Economic Security.

² For the remainder of this report, the term “foster home” refers to a licensed family foster home.

³ Young adults can request to remain in Department custody and receive services until age 21.

Figure 1
Where Arizona children and young adults in Department custody were placed
As of June 30, 2019
(Unaudited)



¹ Includes 159 children for which the Department’s case management system did not have a current placement identified, 31 children preparing to return home through short-term visits, and 1 child in independent living (a program that provides older children in foster care with independent living services to help them prepare for self-sufficiency in adulthood).

² Includes shelters, group homes, and residential treatment facilities.

³ Includes licensed kinship foster homes.

⁴ Includes 14 young adults for which the Department’s case management system did not have a current placement identified and 7 young adults who had run away while in Department custody.

Source: Auditor General staff analysis of information from the Department’s July 2019 Monthly Operational and Outcome Report.

Department contracts for foster home recruitment and support services

During the audit period, the Department contracted with approximately 30 contractors to help recruit and support foster and adoptive homes.⁴ Multiple contractors operate in each county, with some contractors operating in a single county and others operating in multiple counties. Prospective foster and adoptive parents may work with any contractor that serves their area and can choose the contractor that is the best fit for them.

The contractors are required to perform various services, sometimes in conjunction with Department efforts. Contracted services related to foster homes include recruiting foster homes, conducting orientations, ensuring foster parents complete pre-service training and providing ongoing training, conducting the home study and assisting with licensure, assisting the Department in identifying potential foster home placements, supervising and supporting foster homes, and identifying respite care options for foster parents (see Appendix A, pages a-1 through a-2, for more detailed information about contractors’ responsibilities).

The contracts expire on October 30, 2019, and the Department awarded new contracts to 25 contractors effective September 1, 2019. Department staff report that this overlap will allow a transition time for foster families who were licensed through a contractor who will no longer be providing services. Although the Department made many changes to the scope of work in the new contracts and raised the rates that contractors receive for placing

⁴ According to a 2018 U.S. Government Accountability Office (GAO) report, 49 states reported using private providers to recruit foster families. In the 3 states where GAO conducted interviews—California, Georgia, and Indiana—private providers were responsible for both recruitment and support of foster families, including helping families to become licensed and providing supports. See U.S. Government Accountability Office. (2018). *Additional actions could help HHS better support states’ use of private providers to recruit and retain foster families*. Washington, DC.

children in foster homes, the core services the contractors are required to provide remain the same. For example, like the previous contracts, the new contracts still require contractors to recruit and support foster parents, provide them with training, and identify respite care options. They also continue to require contractors to assist the Department in finding foster home placements for children in Department care.

For the contracts that are in effect until October 30, 2019, the Department has paid contractors set rates for (1) each foster home that becomes licensed to foster and each adoptive home that becomes certified to adopt, (2) each day a foster or adoptive home bed is filled with a child, and (3) respite care reimbursements. The Department has also reimbursed contractors for the actual costs of approved recruitment campaigns. Additionally, the Department has paid its contractors to provide pre-service training to foster and adoptive homes. As of August 20, 2019, the Department had paid its contractors nearly \$21.7 million for services provided in fiscal year 2019 (see Table 1).

Table 1
Contractor payments for foster/adoptive home services provided in fiscal years 2017 through 2019
As of August 20, 2019
(Unaudited)

	2017	2018	2019
Filled foster/adoptive home beds	\$17,294,989	\$15,839,500	\$14,620,828
Foster home study and licensure	3,974,097	2,909,870	2,484,079
Foster/adoptive home training	2,606,135	2,336,854	2,208,829
Adoption home study and certification, other adoption-related services	1,718,041	1,138,014	915,126
Child-specific recruitment for adoption	896,424	1,013,264	834,290
Foster home respite	597,303	566,494	592,765
Recruitment campaigns	80,453	106,433	641 ¹
Payment totals	\$27,167,441	\$23,910,428	\$21,656,558

¹ For fiscal year 2019, the Department reported that it conducted a recruitment campaign entirely in-house rather than approve and pay contractors to conduct specific recruitment campaigns.

Source: Auditor General staff summary of Department-provided information.



Department’s licensing standards are generally consistent with model standards, and Department reported using foster homes for over 40 percent of children in care

Laws 2017, Ch. 311, §4, directed us to review the Department’s practices for licensing and using foster parents.

Foster homes must meet several requirements to become licensed

State law requires the Department to license foster homes.⁵ To become licensed, foster parents must meet general license requirements (see textbox for examples) and do the following:

- Watch a 5-part orientation video on becoming a foster parent. The videos cover a wide range of topics, including licensing requirements and time frames, the typical age of children in care, that the goal of foster care is reunification, and how to begin the licensing process. The Department reported that it developed the orientation videos in an effort to promote more consistency in orientation messages.
- Complete pre-service training and an additional 12 hours of training during the 2-year licensure period. The Department uses Foster Parent College (FPC) for its pre-service training, which is a nationally recognized training program for adoptive, kinship, and foster parents. Through FPC, prospective foster parents complete 5 in-person training sessions and 12 online classes that are grouped in 5 parts. This training provides an overview of the foster care system, including goals of child welfare, the Department’s responsibilities and mission, the roles and responsibilities of those involved in the child welfare system, what to expect as a foster/adoptive parent, available supports and services (such as health care), working with biological parents, addressing child discipline, cultural issues, sexual abuse of children, and Department investigations. Additionally, the online classes make the training more accessible to parents who can complete them from

Examples of general foster parent licensure requirements

- Reside in and be lawfully present in the United States.
- Be at least 21 years old.
- Live in a home in which all adult household members pass a background check based on the central registry, a completed and notarized criminal self-disclosure, and a Level One fingerprint clearance card from the Arizona Department of Public Safety (DPS).¹
- Live in a home in which all household members are free of medical, physical, or mental health conditions that would interfere with the safe care and supervision of a foster child.
- Have income or resources to afford current expenses without regard to future reimbursement.
- Provide a safe home with sufficient space and privacy for a foster child.

¹ The central registry refers to information the Department maintains on substantiated reports of child abuse or neglect. DPS issues fingerprint clearance cards certifying that the person named on the card does not have a state or federal criminal history containing an offense specified in statute as a precluding crime.

Source: Auditor General staff review of Arizona Administrative Code (AAC), Title 21, Ch.6.

⁵ Relatives or persons with a significant relationship with the child are not required to be licensed to provide foster care.

home. According to voluntary participant surveys completed between January 2018 and March 2019, more than 97 percent of participants felt the courses provided them a basic level of knowledge to prepare them for being a foster parent and more than 95 percent of participants felt their in-class instructors effectively conveyed information in the class meetings.

- Submit to a home study to assess a prospective foster parent's capacity and ability to meet the needs of children in foster care. The home study process includes completing forms, agreements, background checks, assessments, and training for the prospective foster parent.
- Pass a life-safety inspection the Department performs to determine whether the foster home and its surrounding premises are safe, sanitary, and in good repair per specific requirements in Department rule.

According to Department data, it took about 6 months on average for a foster parent to become licensed in fiscal years 2017 through 2019.⁶ Arizona foster home licenses are valid for 2 years and specify the ages, sex, and number of children who can be placed in the foster home. Once licensed, a foster parent may choose to close his/her license at any time by submitting a written notice to the Department on its prescribed form. Additionally, the Department may deny, suspend, or revoke the license of any foster home for failure to maintain the standards of care prescribed by the Department.

Department's licensing standards are generally consistent with model standards

The U.S. Department of Health and Human Services (HHS) developed model licensing standards for child welfare agencies. Although HHS did not require agencies to comply with these standards, it required agencies to compare their licensing standards to HHS standards and report back to HHS explaining any differences. The Department reported 3 differences concerning the age of the foster parent, required vaccinations, and swimming pool safety. According to the Department, these differences reflect policy considerations intended to further a child's best interest in a placement decision. For example, the Department reported that it has stricter pool safety rules because Arizona has more swimming pools per capita than any other state, and child drownings in Arizona are nearly twice the national average, according to the Department. Department records show that, as of June 2019, HHS accepted the Department's submission documenting the differences.

We also reviewed the Department's foster home licensure requirements and compared them to model family foster home licensing standards from the National Association for Regulatory Administration (NARA).⁷ Although the Department is not required to align its standards with this model, we found that the Department's licensure requirements generally incorporated the NARA standards. Some differences included requirements pertaining to the age of the foster parent, required vaccinations, the number of children who may share a bedroom, and swimming pool safety.

Department reported placing over 40 percent of children in out-of-home care in foster homes during fiscal years 2018 and 2019

According to Department reports, the Department placed approximately 41 to 43 percent of children in out-of-home care in foster homes during fiscal years 2018 and 2019. As shown in Figure 2 (see page 7), during these 2 fiscal years, the number of licensed foster homes declined about 18 percent because more foster homes closed their licenses than became licensed each month (see Finding 1, pages 24 through 25, for additional information about license closures). Figure 2 also shows that the number of children in out-of-home care declined by approximately 16 percent during this time frame.

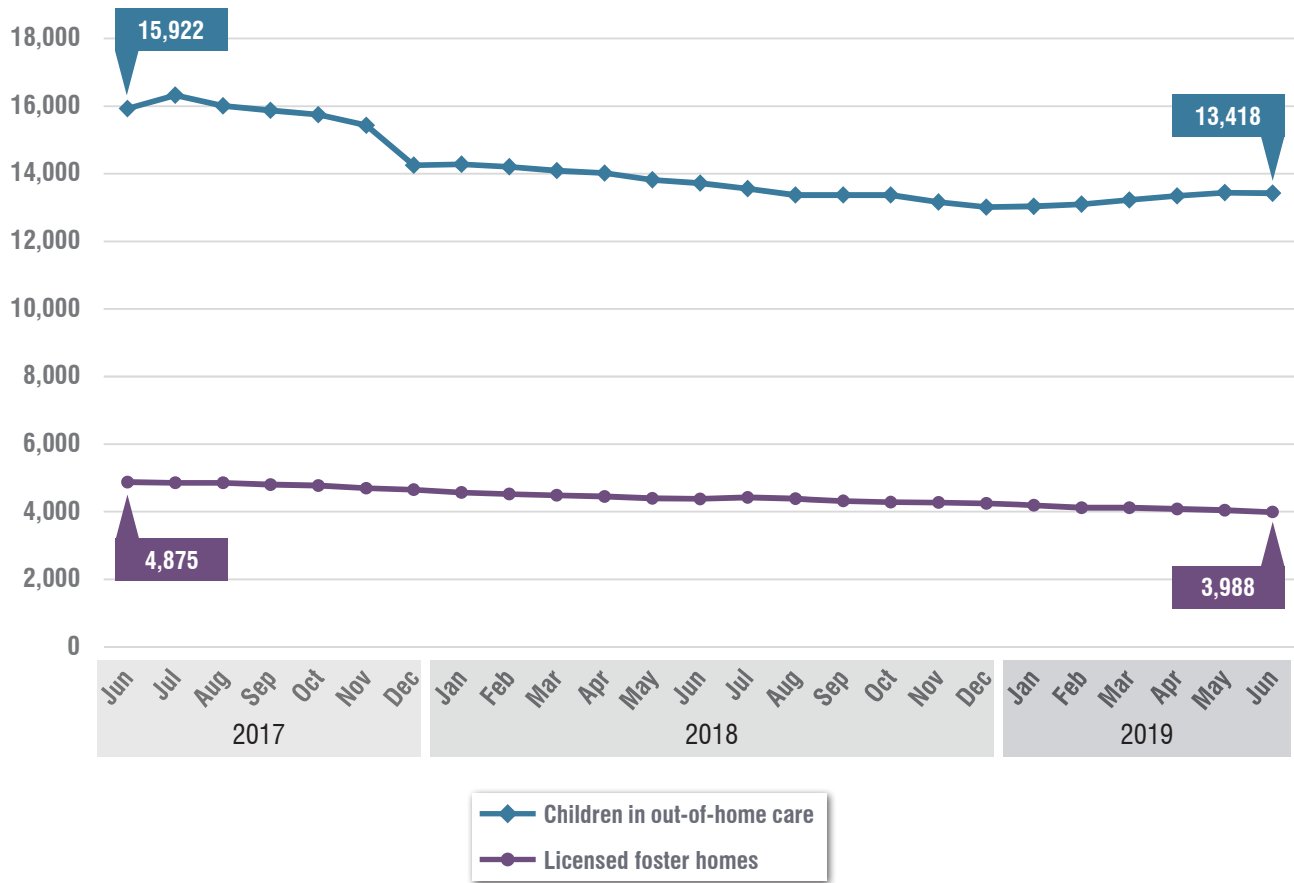
⁶ According to AdoptUSKids (an organization operated by the Adoption Exchange Association and funded by the Children's Bureau), "On average, it takes from four to twelve months to complete the steps necessary to be licensed to adopt or foster—including submitting an application, undergoing a home study, and attending training."

⁷ NARA developed these standards with the American Bar Association Center on Children and the Law, The Annie E. Casey Foundation, and Generations United. HHS reported that it gave considerable deference to the NARA standards in making final revisions to its own model licensing standards.

Figure 2

**Number of licensed foster homes and number of children ages 0 to 17 in out-of-home care
June 30, 2017 through June 30, 2019**

(Unaudited)



Source: Auditor General staff analysis of information from the Department's Monthly Operational and Outcome Reports.

Federal fiscal year 2017 data indicates Department used foster homes to a lesser extent when compared nationally

The Annie E. Casey Foundation's (AECF) analysis of federal data for federal fiscal year 2017, the most recent year for which this data is available, indicates that Arizona placed children in nonrelative foster homes to a lesser extent when compared nationally; however, it placed children with relatives to a greater extent (see Table 2, page 8).⁸ The Department's higher placements with relatives is consistent with A.R.S. §8-514(B), which establishes placement with a family member/kinship as preferential to placement with a licensed foster home. According to this data, the percentage of Arizona children placed in group homes or institutions was slightly higher than the national percentage.

⁸ This federal data is from the Adoption and Foster Care Analysis and Reporting System (AFCARS), a federally mandated data collection system into which states must submit data on their respective foster care systems to HHS. According to Department staff, AFCARS data and Department data use different data collection methodologies and will not match.

Table 2**Percentage of children in care by placement type for Arizona and the U.S.¹****As of September 30, 2017**

(Unaudited)

	Arizona	U.S.
Relative	45%	32%
Nonrelative foster home	37	45
Group home or institution	15	12
Other ²	3	11

¹ Includes children ages 0 to 20.

² Other placement types include trial home visit, pre-adoptive home, independent living, and runaway.

Source: The Annie E. Casey Foundation Child Trends analysis of data from AFCARS, made available through the National Data Archive on Child Abuse and Neglect, accessed on 9/18/19 from AECF's website at <https://datacenter.kidscount.org>.



Department has engaged in recommended foster home recruitment practices and estimates needing additional foster homes for certain groups of children

Laws 2017, Ch. 311, §4, directed us to review the Department's practices for recruiting and retaining foster parents.

Best practice literature provides guidance for foster home recruitment

Best practice guidance for foster home recruitment encourages child welfare agencies to use data on the needs of children in foster care and the supply of foster homes to inform recruitment strategies; use a mix of recruiting strategies, including targeted recruitment; monitor and streamline the intake-to-licensure pipeline; and focus on support of foster parents to engender positive word-of-mouth, which can support both retention and recruitment efforts.

These recommended practices were frequently cited in guidance for foster home recruitment put forth by organizations such as AECF and the National Resource Center on Diligent Recruitment (NRC-DR) at AdoptUSKids, which was informed by effective practices carried out by child welfare agencies around the country that have worked with these organizations.⁹

As discussed below, the Department carries out or requires its foster home recruitment and support contractors (contractors) to perform recruitment activities consistent with these best practices. We identified some areas for improvement that are discussed in subsequent findings, as noted below.

Department uses data to identify recruitment needs and estimates additional foster homes are needed to meet needs of specific groups of children in out-of-home care

Department uses data to estimate foster home recruitment needs—Best practice literature recommends using data on the needs of children in out-of-home care and the supply of foster homes to inform recruitment strategies.¹⁰ According to a 2018 U.S. Government Accountability Office (GAO) report on state child

⁹ Between 2002 and 2017, the NRC-DR was housed within AdoptUSKids and worked with child welfare agencies across the U.S. to help build their capacity to recruit and retain foster parents. As of July 2019, the NRC-DR's work is now carried out by the Child Welfare Capacity Building Collaborative (a part of the Children's Bureau), according to the NRC-DR website.

¹⁰ Goodman, D. & Steinfield, F. (2012). *Building successful resource families: A guide for public agencies*. Baltimore, MD: The Annie E. Casey Foundation. Retrieved 10/3/18 from <https://www.aecf.org/resources/building-successful-resource-families/>; Marcenko, M., Brennan, K., & Lyons, S. (2009). *Foster parent recruitment and retention: Developing resource families for Washington State's children in care*. Seattle, WA: Partners for Our Children. Retrieved 10/3/18 from https://partnersforourchildren.org/sites/default/files/2009_foster_parent_recruitment_and_retention.pdf; The National Resource Center for Diligent Recruitment (NRC-DR) at AdoptUSKids. (n.d.). *Data-driven recruitment: Key data elements on foster and adoptive families*. Retrieved 9/11/19 from <https://library.childwelfare.gov/cwig/ws/library/docs/gateway/Blob/119533.pdf?r=1&rpp=10&upp=0&w=+NATIVE%28%27recno%3D119533%27%29&m=1>.

welfare agencies' foster home recruitment practices, 39 states reported using data on their child population (e.g., demographics and service needs) to inform recruitment strategies, and 31 states reported using data on their foster home supply (e.g. location and placement preferences) for the same purpose.¹¹ Consistent with this practice, the Department implemented a "recruitment estimator" tool in 2018 to forecast, State-wide and by county, the number and types of foster homes needed over a 12-month period.¹² Estimates are based on data about the needs of children in out-of-home care (e.g., age, race, and specialized needs) and the current supply of homes to meet those needs, including expected foster home closures.¹³ The Department reported that it generates the estimates quarterly and that it uses the estimates to inform its own recruitment strategies and shares them with its contractors to assist with recruitment needs.

Additional foster homes needed for teenagers, large sibling groups, and children with special health care needs, and to better match the ethnic/racial diversity of children in care—Using its recruitment estimator tool, the Department has forecasted that additional foster homes are needed that are licensed to care for certain groups of children, including teenagers and large sibling groups, as well as children with special health care needs. According to the 2018 GAO report, nearly all states have reported difficulties recruiting foster homes for children with aggressive behaviors and severe mental health needs, as well as for teenagers and sibling groups.¹⁴ The Department also estimated needing additional foster homes of specific ethnicities/races. Specifically, the Department's July 2019 estimates identified the following needs:

- Although new foster homes were needed for all ages of children, the need is highest for teenagers. According to Department estimates, 17 new homes were needed for children ages 0 to 2, while 767 new homes were needed for children ages 13 to 17 (See Figure 3, page 11).
- An additional 549 foster homes were needed with 4 or more beds for large sibling groups.
- An additional 406 new foster homes were needed to care for medically complex children.¹⁵
- Additional homes were needed to better reflect the ethnic and racial diversity of children in out-of-home care. The Department estimated that it had the greatest need for additional Hispanic foster homes (see Figure 4, page 11).

Children might be placed in a more restrictive or less ideal setting when a foster home that can meet their needs is not identified—Placing a specific child in a foster home requires consideration of the child's needs and the willingness and ability of the foster home to care for the child consistent with the home's licensing parameters. If a match is not identified, the child may be placed in a setting that is more restrictive (such as congregate care) or that may not fully satisfy all competing placement considerations.¹⁶ For example:

- Department policy states that its DCS specialists (caseworkers) should consider placing a child in a group home (a congregate care setting) if no kinship placement or licensed foster home that can meet the child's

¹¹ U.S. Government Accountability Office. (2018). *Additional actions could help HHS better support states' use of private providers to recruit and retain foster families*. Washington, DC.

¹² The Department reported that it developed the recruitment estimator based on a model designed by AECF.

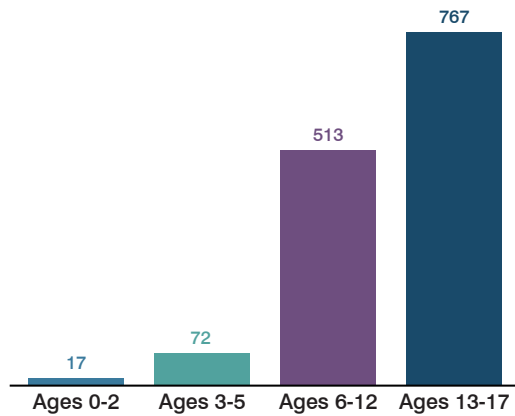
¹³ According to the Department, several assumptions are made to develop the estimates: (1) the average number of beds per foster home is 2; (2) certain groups of children are more difficult to place than others, and the estimated number of foster homes needed for those groups are adjusted higher; and (3) due to data limitations, the proportion of out-of-home-care placements in foster homes will remain constant.

¹⁴ U.S. GAO, 2018.

¹⁵ According to Department guidance created for foster parents, a medically complex child is a child with special health care needs as determined by the Department and includes children who have or are at risk for chronic physical, developmental, or emotional conditions and who also require health and related services of a type or amount beyond that required by children generally. A child must have special needs in at least 1 of the following categories to be assessed as medically complex: substance exposed/premature infant, serious medical condition, or substantial developmental delays.

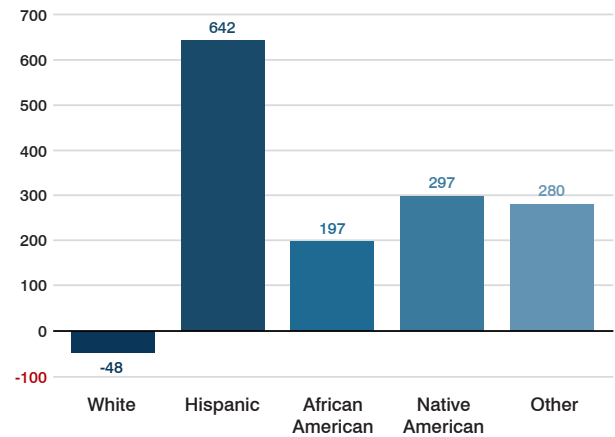
¹⁶ Congregate care is a placement setting that provides 24-hour care to children in a group setting as opposed to a family setting. Congregate care settings include group homes, shelters, and residential treatment centers.

Figure 3
Department-estimated number of new foster homes needed by age category
As of July 2019
(Unaudited)



Source: Auditor General staff review of the Department's July 2019 recruitment estimator forecasts.

Figure 4
Department-estimated number of new foster homes needed by ethnicity/race
As of July 2019
(Unaudited)



Source: Auditor General staff review of the Department's July 2019 recruitment estimator forecasts.

needs has been identified.¹⁷ Although initially placing a child in a congregate care setting might be necessary in this situation, child welfare literature describes potential risks to children who live in congregate care settings.¹⁸ For example, according to a review of research on congregate care conducted by the National Conference of State Legislatures, “youth who live in institutional settings are at greater risk of developing physical, emotional, and behavioral problems that can lead to school failure, teen pregnancy, homelessness, unemployment, and incarceration and are less likely to find a permanent home than those who live in foster care.”¹⁹ Casey Family Programs and HHS also conducted a review of research on congregate care usage and noted similar negative effects for children living in congregate care settings.²⁰ Additionally, congregate care is more costly than foster homes. For example, the Department pays approximately \$30 to \$70 per child per day for foster home care but pays \$124 to \$200 per child per day for group home care.²¹

- Department policy also states that the Department shall make reasonable efforts to place siblings together when possible. Separating sibling groups can negatively impact children, such as increasing the risk of

¹⁷ This policy also notes that placement in a group home may be the least restrictive setting that can meet the child's needs if the child has a recent history of unsuccessful placements in family settings, despite provision of services to support placement stability; or the child has supervision or behavior management requirements that cannot be met in a family environment. Additionally, in some cases, such as a delinquent youth, a judge may order the Department to place a child in congregate care. Further, the Department reported that large sibling groups may be placed in congregate care to keep them together and some older children prefer to stay in congregate care.

¹⁸ The Department reported that although a child may be placed in congregate care, it continues to make efforts to identify family-like settings. For example, as discussed on page 13, the Department employs a staff member in its placement unit who works individually with specific children (who are either in a congregate care setting or are removed from their homes and need a placement) to find a foster family for that child or sibling group. In addition, the Department employs family engagement specialists for its Fostering Sustainable Connections project, which attempts to reduce the time children spend in congregate care settings through activities such as enhancing family/fictive kin search and engagement activities.

¹⁹ National Conference of State Legislatures. (2017). *Congregate care, residential treatment and group home state legislative enactments, 2009-2013*. Denver, CO. Retrieved 4/17/2019 from <http://www.ncsl.org/research/human-services/congregate-care-and-group-home-state-legislative-enactments.aspx>.

²⁰ Casey Family Programs. (2018). *What are the outcomes for youth placed in congregate care settings?* Seattle, WA. Retrieved 4/17/2019 from <https://www.casey.org/what-are-the-outcomes-for-youth-placed-in-congregate-care-settings/>; Children's Bureau. (2015). *A national look at the use of congregate care in child welfare*. Washington, DC: U.S. Department of Health and Human Services, Administration for Children and Families. Retrieved on 4/17/19 https://www.acf.hhs.gov/sites/default/files/cb/cbcongregatecare_brief.pdf.

²¹ The foster home care cost includes daily rates paid to both Department contractors (using the rates included in the new contracts effective September 1, 2019) and foster parents.

behavioral problems and poor school performance, and can inflict additional emotional trauma.²² However, some siblings groups might be separated if the Department cannot identify a foster home that can care for the entire sibling group. Additionally, according to the Department, some siblings might be separated for other reasons. For example, half-siblings might be separated to be placed with their respective biological relatives (which is a less-restrictive placement than a foster home placement). The Department reported that, alternatively, other siblings may be placed in a group home to keep them together. The Department has a monthly goal to place 80 percent of sibling groups together when they enter foster care but, for January through June 2019, averaged approximately 49 percent for Maricopa County, 56 percent for Pima County, and 71 percent for Northern Arizona.²³

- Federal law requires child welfare agencies to recruit foster homes that reflect the ethnic and racial diversity of children in their states, and guidance from HHS notes that this helps to develop a pool of foster parents that reflect the backgrounds of children and may lead to increased permanency for children.²⁴ If the supply of foster homes does not match the ethnic or racial composition of the children in out-of-home care, children might be placed in homes that do not reflect their backgrounds.

Department carries out common foster home recruitment strategies and requires its contractors to recruit homes that meet needs of children in care

Department uses mix of foster home recruitment strategies—According to literature and the 2018 GAO report, foster home recruitment strategies carried out by child welfare agencies in the U.S. include general, targeted, and child-specific activities (see textbox).²⁵ According to AECF, general recruitment should be

Foster home recruitment strategies

General recruitment activities consist of basic, undifferentiated outreach to the public conveying the need for foster homes and are the recruitment activities child welfare agencies most often use. Examples include television and radio announcements, billboards, booths at community events, and advertisements in newspapers and social media.

Targeted recruitment activities are similar to general recruitment activities but direct the messages to a specific audience—individuals who are most likely to become foster parents for specific types of children. Examples include placing human interest stories in neighborhood publications, engaging teens as recruiters, partnering with a faith organization in a specific neighborhood, and/or customizing recruitment materials to reflect targeted groups of children.

Child-specific recruitment activities involve developing an individual recruitment plan for a specific child or sibling group in need of temporary care or a permanent family (adoption). This type of recruitment is typically carried out by the child's caseworker in collaboration with a recruiter. Kinship options are typically explored first. Activities may include creating customized brochures or flyers that highlight a child's personality, likes/dislikes, activities, and needs. This recruitment strategy is time-intensive but the most effective strategy for finding the right home for a child.

Source: Goodman & Steinfeld, 2012.

²² Child Welfare Information Gateway. (2013). *Sibling issues in foster care and adoption*. Washington, DC: U.S. Department of Health and Human Services, Children's Bureau. Retrieved 7/31/2019 from <https://www.childwelfare.gov/pubPDFs/siblingissues.pdf>; Kernan, E. (2006). *Keeping siblings together: Past, present, and future*. Oakland, CA: National Center for Youth Law. Retrieved 7/31/2019 from <https://youthlaw.org/publication/keeping-siblings-together-past-present-and-future>.

²³ These statistics apply to all sibling groups and not just large sibling groups.

²⁴ Greenberg, M.H., Lopez, R., Samuels, J., & Gupta, V. (2016). *Title VI child welfare guidance*. Washington, DC: U.S. Department of Health and Human Services and U.S. Department of Justice. Retrieved 1/31/2019 from <https://www.hhs.gov/sites/default/files/title-vi-child-welfare-guidance-10-19-16.pdf>. This requirement is also found in the Federal Multi-Ethnic Placement Act (MEPA) contained in Public Law 103-382, Part E, Subpart 1, §§551-554.

²⁵ U.S. GAO, 2018.

considered the baseline communication required to inform stakeholders and the public about the need for foster homes, while targeted recruitment is more effective at recruiting the right types of homes for children in care, and it recommends devoting more resources to targeted recruitment.²⁶

Consistent with other state practices and best practice guidance, the Department has used general, targeted, and child-specific recruitment strategies to recruit foster parents. For example, the Department carried out 2 targeted recruitment campaigns with the assistance of a local marketing firm in 2018 and 2019 that focused on recruiting foster homes for groups of children for which it has identified a higher need for additional foster homes, such as teenagers (see textbox). The Department reported that its fiscal year 2018 “Change Two Lives” campaign resulted in 393 inquiries and 21 individuals entering pre-service training, while the contractors’ “Change Two Lives” campaigns had resulted in 323 inquiries and 8 individuals entering pre-service training. As of July 2019, neither the Department’s nor the contractors’ campaigns had yet resulted in new licenses. The “Foster a Future” campaign was still ongoing as of July 2019.

Department’s 2018 and 2019 targeted foster home recruitment campaigns

“Change Two Lives”—A targeted recruitment campaign the Department conducted in fiscal year 2018 to recruit foster homes for teenagers. It initially ran from March through June 2018 and included messages and materials focused on caring for teens shared via social media. To further focus the delivery of its messages, the Department hired a consultant from Arizona State University (ASU) to direct campaign messages to individuals in certain neighborhoods where foster parents were needed. The Department granted awards to several of its contractors to participate by running their own version of the campaign.

“Foster a Future”—Another targeted recruitment campaign the Department began conducting in March 2019 to recruit foster homes for older youth, teenagers, sibling groups, children with Native American heritage, and children who speak Spanish. This campaign involves disseminating content (including photos and videos) via social media and other online communications, such as email. The Department reported that it did not grant monies to its contractors for this campaign but offered its contractors the opportunity to participate by using the graphics created for the campaign in their recruitment materials. This campaign was still ongoing as of July 2019.

Source: Auditor General staff interviews with Department staff and review of Department recruitment campaign materials and other documentation.

The Department primarily uses child-specific recruitment strategies for adoptive homes; however, it is using this strategy in a limited way to identify foster placements for children in its care.²⁷ Specifically, it employs one staff member who works individually with specific children (who are either in a congregate care setting or are removed from their homes and need a placement) to find a foster family for that child or sibling group.

Department’s contractors are also required to recruit foster homes—Both the prior and the new contracts (effective September 1, 2019) require contractors to recruit foster homes. As described in the scope of the new contracts, the contractors are required to recruit foster homes on a regular basis in order to sustain the contractors’ business. The contractors are also required to recruit foster homes that meet the needs of children in Department care and use Department data regarding the number, age, gender, and race/ethnicity of the children in out-of-home care and their geographic information to target where the need for additional foster homes is the greatest. The contractors are required to develop activities to attract new and existing families who reflect the cultural, age, gender, and racial population of the children in need of foster homes. In addition, they are required to promote peer-to-peer recruitment by educating, encouraging, and supporting foster parents in their recruitment of other potential foster parents.

²⁶ Goodman & Steinfeld, 2012.

²⁷ The Department maintains its own online photo listing, the Children’s Heart Gallery, and uses the national online photo listing, AdoptUSKids, to make information and media related to children in Department care who are available for adoption publicly available.

The Department has also revised the payment structure in its new contracts to better incentivize recruiting foster homes that are willing and able to accept placements. Under the previous contracts, the Department paid contractors approximately \$2,150 for helping a new foster family become licensed and then \$8.00 to \$12.00 per day, depending on the child’s needs and location (i.e., urban vs. rural), for each day that a foster child remained in one of the contractor’s licensed foster homes. Under the new contracts, the contractors no longer receive a payment at the time of a foster home’s licensure. Instead, this payment has been bundled into the daily rate for filled foster home beds, and contractors are paid at a higher daily rate than before—between \$10.50 and \$22.00 per day, depending on the child’s age, location, and needed level of care.

Department requires contractors to guide prospective foster parents through licensure process and tracks applicants’ progress, but should better monitor intake practices

Best practice literature emphasizes the importance of guiding and supporting a potential foster parent through the required steps in the process of becoming a foster parent.²⁸ This process begins with intake (the point of initial inquiry) and includes an orientation, pre-service training, a home study, and licensure. While this process includes steps that are meant to disqualify inappropriate candidates, the process overall should be expeditious, and some steps (e.g., intake and orientation) should focus on welcoming applicants rather than screening individuals out, according to best practice literature. An efficient development process is critical to the effectiveness of foster home recruitment, and child welfare agencies should collect and analyze information pertaining to each step in the process in order to identify bottlenecks, according to AECF.

The Department’s contractors are required to support, educate, and encourage potential foster families as they move through the licensure process. This includes providing information and assistance to any family interested in licensure, maintaining a website with information on how to become a foster parent in English and Spanish, and holding “meet and greets” with individuals curious about becoming a foster parent where they can ask questions and meet others in the foster community.

In addition, the Department tracks and has set monthly targets for the number of individuals at specific stages of the development process, which are reported by its contractors (see Table 3). The Department reported that it has focused on increasing the number of inquiries, with the expectation that this will increase the number of new licenses. According to Department data, the Department generally met this inquiry goal, on average, in fiscal year 2019, as well as its goal for foster homes licensed.

Best practice literature also provides guidance on how foster parents should be helped at each stage of the licensure process.²⁹ For example, inquiry calls from prospective foster parents should be answered by a live person promptly and should welcome and encourage the caller to proceed through the process. However, as discussed in Finding 2 (see pages 27 through 29), we identified needed improvements to the Department’s monitoring of its staff’s and contractors’ handling of calls from prospective foster parents, particularly in Spanish.

Table 3
Monthly foster home recruitment targets and averages¹
Fiscal year 2019
(Unaudited)

	Fiscal year 2019	
	Monthly target	Monthly average
Inquiries received	1,058	1,034 (98%)
Online orientations viewed	529	269 (51%)
Pre-service training enrollment	212	179 (84%)
Foster homes licensed	110	137 (125%)

¹ Includes licensed kinship foster homes.

Source: Auditor General staff analysis of Department-provided information.

²⁸ Goodman & Steinfield, 2012; Myslewicz, M. & Garcia, K.Y. (2014). *Effective practices in foster parent recruitment, infrastructure, and retention*. Seattle, WA: Casey Family Programs. Retrieved 10/3/2018 from https://calswec.berkeley.edu/sites/default/files/effective_practices_in_foster_parent_recruitment_and_retention.pdf.

²⁹ Goodman & Steinfield, 2012; Marcenko, Brennan, & Lyons, 2009.

Department requires contractors to provide multiple supports to foster parents but should improve its foster parent customer service

To help build and maintain an adequate foster home supply, best practice literature encourages child welfare agencies to prioritize efforts to support current foster families.³⁰ According to this literature, foster parents who are content in their fostering experience are the best recruiters of new foster parents; conversely, foster parents who are discontent and spread negative word of mouth about fostering dissuade others from becoming foster parents. Thus, by focusing on ways to improve the overall experience of foster parents, child welfare agencies stand to better retain their current foster homes and more effectively recruit new homes.

The Department's contractors are required to support foster parents, and the Department reported that one of the goals of its new contracts was to better define and increase the level of support provided to foster parents as compared to what was required under its prior contracts. In a pre-bid conference for the new contracts, we observed Department leadership broadly describe this expectation, explaining that issues related to children in foster care will be the Department's responsibility, while issues related to foster parents will be its contractors' responsibility. For example, contractors are expected/required to:

- Be mediators between foster families and Department caseworkers should conflicts or disagreements arise.
- Create individualized family support plans based on each foster family's strengths and identified needs. All plans should include individualized instruction and supports for the family and should be updated or adjusted with each child placed in the home to accommodate any additional needs. This plan should follow the foster family throughout its licensure, including if the family transfers to a different contractor. Contractors are required to include specific information in these plans, such as a detailed list of all training and support services to be provided, options for addressing possible conditions or situations that may occur at each step of the foster process, available crisis intervention services, and determinations of the family's strengths and areas for improvement.
- Conduct home visits that focus on enhancing the family's skills and identifying the family's needs for strengthening child placements and family relationships.
- Provide ongoing trainings and informational seminars for the families that keep them informed on current best practices, the latest trends, and progressive fostering techniques. Additionally, to help meet the needs of children in out-of-home care, contractors are expected to expand the placement options within the families that they serve based on the families' skills. For example, a family who has been successful with younger children may have the skills to expand their placement options to include teenagers based on their observed abilities.
- Survey all of their foster families to determine what is working, what needs attention, and any suggestions on how to make things work better for the families. Survey results should be sent to the Department. The contractors are also required to survey foster families who have closed their licenses while in good standing to determine those who are willing to reopen their license or become relicensed.
- Develop and make available foster family support groups or offer participation in already established support groups, which are easily accessible to foster families. The contractors are also required to conduct support activities for foster families that promote building relationships with other foster families, such as meet and greets with respite families or picnics at parks.

The Department also carries out various additional activities intended to support foster parent retention, including holding annual conferences focused on foster parent education in different areas of the State, sending an e-newsletter to foster parents to provide information on accessing community resources and highlight foster parent stories, giving foster parents awards and certificates of recognition for years of service, and maintaining a telephone line for foster parents to call for assistance. This telephone line is staffed during business hours.

³⁰ Myslewicz & Garcia, 2014; Marcenko, Brennan, & Lyons, 2009.

However, as discussed in Finding 1 (see pages 17 through 25), foster parents have provided consistent feedback through multiple surveys and focus groups that indicates a need for improved customer service from the Department in its interactions with them and more information about children in their care.



Foster parent feedback indicates a need for improved Department customer service and more information about children in their care, which could help improve foster home recruitment and retention

As discussed on page 15, best practice literature encourages child welfare agencies to prioritize efforts to support current foster families.³¹ As previously mentioned, according to this literature, foster parents who are content in their fostering experience are the best recruiters of new foster parents; conversely, foster parents who are discontent and spread negative word of mouth about fostering dissuade others from becoming foster parents. Thus, by focusing on ways to improve the overall experience of foster parents, child welfare agencies stand to better retain current foster homes and more effectively recruit new foster homes.

We present 3 issues in this finding: foster parent feedback indicates a need for the Department to (1) improve its customer service to foster parents (see textbox) and (2) ensure that it provides required information to foster parents about children in their care, and (3) Department data may not fully reflect reasons for foster home license closure in all cases.

Customer service—The NRC-DR defines customer service in child welfare as customers' perceptions of the way they are treated, the responsiveness of the services provided, and the extent to which they are engaged in teamwork to meet the needs of children and youth.

Source: National Resource Center for Diligent Recruitment (NCR-DR) at AdoptUSKids. (2013). *Using customer service concepts to enhance recruitment and retention practices*. Retrieved 2/7/19 from http://www.nrcdr.org/_assets/files/using-customer-service-concepts-to-enhance-recruitment-and-retention-practices.pdf.

Issue 1: Foster parents have provided consistent feedback indicating a need for improved Department customer service

Foster parent feedback has consistently cited issues related to Department customer service

As part of this audit, we reviewed the results of Department efforts since 2014 to obtain feedback from foster parents. These efforts have included surveys and focus groups with current and former licensed foster parents to understand their experiences, identify areas for improvement, and understand the reasons for license closure (see textbox, page 18). We also facilitated focus groups with current and former licensed foster parents to solicit feedback about their fostering experiences at key stages such as recruitment, licensing, child placement, post-

³¹ Myslewicz, M. & Garcia, K.Y. (2014). *Effective practices in foster parent recruitment, infrastructure, and retention*. Seattle, WA: Casey Family Programs. Retrieved 10/3/2018 from https://calswec.berkeley.edu/sites/default/files/effective_practices_in_foster_parent_recruitment_and_retention.pdf; Marcenko, M., Brennan, K., & Lyons, S. (2009). *Foster parent recruitment and retention: Developing resource families for Washington State's children in care*. Seattle, WA: Partners for Our Children. Retrieved 10/3/18 from https://partnersforourchildren.org/sites/default/files/2009_foster_parent_recruitment_and_retention.pdf.

Department efforts to obtain foster parent feedback

2014—The Department conducted 2 surveys in collaboration with the ASU Center for Applied Behavioral Health Policy. The first surveyed former foster parents who voluntarily closed their foster home license within the 12 months preceding the implementation of the survey and aimed to better understand the reasons why foster parents closed their licenses. The survey was mailed to 701 foster homes, but 184 surveys were undeliverable as addressed, 3 surveys were returned indicating the foster homes were licensed, and 4 surveys were received after the cut-off date. Of the remaining 510 mailed surveys, there were 116 responses, representing a 23 percent response rate. The second survey solicited feedback from actively licensed foster parents to understand their motivation to foster, experiences fostering, working with licensing agencies and DCS staff, and with training and support. Participants were also asked to provide feedback on areas that need improvement. An anonymous online survey was used, which the Department emailed to 3,892 licensed foster parents. There were 1,095 responses to this survey, representing a 28 percent response rate.

2016—The Department conducted 3 focus groups with approximately 50 actively licensed foster parents in Phoenix and Tucson with the assistance of the NRC-DR. Invitations were sent to foster parents who had been licensed for 2 years or less, although some focus group participants had more than 2 years' experience because invitees were allowed to invite other foster parents to participate. According to a report summarizing the feedback from these focus groups, the Department's intent in facilitating these focus groups was to solicit ideas on how to best improve foster home recruitment and the orientation and ongoing support of foster parents. The report noted that "focus groups allow for a more concentrated sharing of ideas and solutions that cannot be harvested from raw data. Hearing directly from foster parents firsthand is critical to any plan for changes in the system as foster parent focus groups can lead to ideas not gained through other forms of feedback."

2017—The Department conducted a survey in collaboration with the ASU Center for Child Well-Being of current and former foster parents to broadly understand the experiences of foster parents. The survey asked questions about motivations for fostering, satisfaction with the fostering experience, and reasons for license closure. There were 2,323 respondents to the survey, of which 1,840 were licensed, 390 had closed their licenses, and 93 had missing information about their licensure status.

2018—The Department conducted 5 focus groups at various locations throughout the State to learn generally about foster parents' experiences. Approximately 25 actively licensed foster parents participated in these focus groups. According to the Department, these focus groups were held to solicit input for developing the scope of work for the new foster home recruitment and support contracts that went into effect September 1, 2019.

Source: Auditor General staff review of Department documentation on these surveys and focus groups.

placement, and license closure (when applicable).³² We also asked them about their working relationships with the Department and its contractors.

The feedback collected from foster parents through these efforts may not fully represent their fostering experiences or reflect the experiences of all foster parents. However, although the purposes and methodologies for collecting foster parent feedback have varied, foster parents have consistently identified Department customer service as an area needing improvement. For example, foster parents have consistently reported a need for improved communication and information sharing and inclusion in decisions made about children in their care. The Arizona Ombudsman-Citizen's Aide Office (AZOCA), an independent agency of the Arizona Legislature that addresses State government treatment of Arizona citizens, also reported some similar concerns from foster parents.

³² We held 6 focus groups in March and April 2019, including 4 focus groups in Maricopa County and 2 in Pima County. We randomly selected current and former foster parents (who had closed their licenses in 2018) to invite to participate. We also received email input from 1 foster parent and interviewed 11 foster parents who were selected to participate in the focus groups but could not attend. Additionally, we interviewed 3 randomly selected foster parents located near Prescott and Yuma. In total, approximately 50 individuals took part in these focus groups and interviews.

Prominent concerns raised by foster parents related to customer service included the following:

- **Poor communication and lack of information sharing from Department staff**—Foster parents have consistently reported a need for better communication between foster parents and Department staff. For example, according to the 2014 survey of actively licensed foster parents, foster parents appreciated regular communication, and some foster parents highlighted instances where Department caseworkers were flexible, responsive, and supportive. However, the survey report noted that foster parents' satisfaction regarding their interactions with Department staff was mixed and stated: "Although many interactions are professional and supportive, foster parents responding to this survey cite examples of other workers who are less responsive and at times, even perceived as disrespectful." The report concluded that "Overwhelmingly, foster parents who participated in the survey would like to see an improvement in communication between [Department caseworkers and supervisors] and foster parents." In the 2017 survey, respondents were asked to identify barriers that may prevent someone from becoming, or continuing as, a foster parent. Respondents cited caseworker failures, including communication, as one of the most common barriers. Foster parents participating in the focus groups we conducted also cited concerns about communication. Many described instances of poor communication, such as being unable to reach Department staff (especially after 5:00 p.m.) or not having their calls returned. Foster parents also reported a general lack of information sharing. For example, several foster parents reported they were not aware of some financial supports available to them or that they did not understand how to obtain medical records or get prescriptions filled for the children in their care.

The AZOCA also reported receiving complaints about poor communication from Department staff. For example, in 1 complaint from 2016, a foster parent alleged that she had repeatedly asked Department staff for information about medication her foster child needed to manage acute behavioral issues and was unable to receive a response. As his medication ran out, the child began to act out and was suspended from school for aggressive behavior. The child went into a state of crisis and had to be hospitalized, at which point, to the foster parent's surprise, Department staff responded by opening an investigation against her claiming she put the child at unreasonable risk of harm. The Ombudsman's Office reviewed her case and concluded the case information corroborated the foster parent's claims. Ultimately, Department management agreed that its staff had improperly handled the situation and cleared the foster parent of the allegation.

- **Lack of support during transitions of children from their homes**—In feedback the Department gathered, foster parents consistently expressed dissatisfaction with the support they received during transitions. For example, in the 2014 survey of current foster parents, respondents expressed needing additional support from the Department when transitioning children in and out of their home. One respondent observed that "[y]ou can't move a child from the home he/she has known for a year to family they don't know at the drop of a hat." Respondents also reported a need for greater understanding regarding the grief and loss they experience when children leave their home. The Department's 2016 focus groups also identified a need for grief/loss support for the entire foster family, and the 2018 northern Arizona focus group similarly indicated that the Department should advocate for thoughtful, planned, intentional transitions for foster children.

Foster parents we spoke with expressed similar concerns. Some foster parents shared experiences in which they said Department caseworkers notified them that the children they had been caring for—sometimes for years—were going to be moved within a matter of hours or the following day. For example, one foster mother reported she had been caring for a boy for 2 years who was ultimately supposed to transition to his adoptive home. She reported that one day she received a text message from the Department caseworker informing her that the boy would be picked up and moved to his adoptive home after she dropped him off at daycare the next day. She conveyed to us how difficult it was for her emotionally to drop him off and walk away with only a 1-day notice. She felt that this experience was not only traumatic for her and her biological son, but for the foster child as well.

- **Excluded from decisions about children in their care**—Foster parents have consistently reported that they feel unvalued or excluded when it comes to making decisions about the children in their care. For example, the summary of the 2014 survey of current foster parents stated "...respondents consistently reported a need to feel valued, respected, and a part of the team." It further stated that foster parents "...

see themselves as a reliable and important source of information and would like to see their perspective valued throughout the case.” According to the survey, 60 percent of respondents felt that the Department considered them as part of the team. In the 2014 survey of foster parents who had closed their licenses, the most commonly cited suggestion that respondents said would have improved their experience was more involvement in the decisions about the welfare of the children in their care. The Department’s 2016 focus groups’ summary states that “[f]oster parents expressed the need to be supported as a valuable member of the team with an equal voice in addressing the needs of children.” Foster parents who responded to the 2017 survey listed the Department’s lack of consideration of foster parent input as a barrier to fostering. Similarly, foster parents who attended the Department’s 2018 northern Arizona focus group suggested the Department allow foster parents to have a voice as part of the child’s team. Foster parents we spoke with reported similar concerns that they felt excluded or not valued as a member of the child’s care team. For example, although some foster parents spoke of caseworkers who went “above and beyond,” or who treated them with respect or as a part of the team, most foster parents we spoke to expressed feeling like they were treated as paid service providers rather than individuals and families caring for children placed in their homes.

- **Difficulty accessing adequate supports**—Feedback collected by the Department and from the foster parents we spoke to showed that some foster parents have found it difficult to attain the supports needed to care for the children placed in their homes. For example, the Department’s 2016 focus groups’ summary states that participants identified improved access to behavioral health services as a priority to help meet foster children’s needs. The Department’s 2018 West Valley focus group summary reported that foster parents mentioned a lack of services for teenage foster children. Additionally, the Department’s 2018 Tucson focus group summary noted that parents cited “false promises of services available” as a barrier.

In 2014, the AZOCA investigated a complaint from a foster parent that she was not receiving the clothing allowance she was entitled to in order to clothe her foster child. The investigation substantiated the complaint, and as a result, the foster parent received the financial support. The AZOCA has noted through its work that the Department needs to be consistent and in accordance with law and policy in handling such financial supports.

We also spoke to foster parents who described difficulties accessing timely and adequate behavioral health services or medical care for the children in their care. Some foster parents attributed their decision to discontinue caring for certain children to those difficulties.³³ Some foster parents described untimely behavioral health services and other barriers to accessing behavioral health services for the foster child they cared for. In some cases, foster parents felt that better Department communication and assistance in accessing medical and behavioral health services would have made their experience easier.

- **Pressure to accept foster placements**—Feeling pressured to accept foster placements is another theme foster parents identified. For example, participants in the Department’s 2016 focus groups recommended that the Department respect foster parents’ boundaries and not guilt them into taking foster children they are not comfortable caring for in their home. Foster parents we spoke with also described feeling pressured by Department staff to care for children who were not within their preferences/license parameters. For example, one foster parent felt strongly that she could provide care for only 2 children, consistent with her license. Department staff reportedly asked her on one occasion to take 4 siblings. She reported that she told them that she could only take 2 of the children. However, when she arrived to pick up the children, she stated that Department staff brought out all the siblings and tried to convince her to foster all 4 of them. Although Department staff were likely trying to place these siblings together, the foster parent reported that she felt pressured.

³³ Children in foster care are automatically enrolled in a medical and behavioral health plan through the State when they are removed from their homes, and according to Department staff, foster parents should be provided with the child’s medical eligibility information (digital insurance card and insurance identification number) within 48 hours.

Department contractors we spoke to also felt that it was in a child's and foster family's best interest for the Department to work through them to find a suitable placement for a child.³⁴ Some contractors reported that they believed when the Department reaches out directly to foster parents to place a child, foster families can feel pressured to accept children that they may not be prepared for, which may lead to placement disruptions and/or cause foster parents to close their licenses. According to a practice guide for child welfare organizations published by Casey, placement practices are identified as an opportunity to support foster parent success.³⁵ Specifically, it states: "placing the right child in the right home is a key component and driver of [foster] family support."

NRC-DR has published guidance on using customer service concepts to enhance foster parent recruitment and retention

As discussed on page 15, the Department requires contractors to provide a higher level of support to foster parents under the new contracts. Although increased contractor support might help address the various customer service issues foster parents reported, it may not fully mitigate poor customer service interactions between foster parents and Department staff. Further, best practice literature encourages child welfare agencies to view foster parent support as everyone's responsibility.³⁶

Through a cooperative agreement with HHS, the NRC-DR published guidance for using customer service concepts to enhance recruitment and retention of foster, adoptive, and kinship families.³⁷ This guidance addresses national trends in foster parent retention that point to a customer service deficiency. For example, the publication cites a finding from a national survey of current and former foster parents, which found that the most commonly cited factors affecting foster parent retention involved interactions with the child welfare agency, including unsatisfactory interactions with workers and agency insensitivity.

The customer service approach described in this publication borrows concepts from the private sector and includes the way people are treated, the attitude with which services are provided, and anything that enhances the customer's experience. Although child welfare is not a business, the NRC-DR points out that customer service competencies are in alignment with professional social work values and best practices. Illustrating the effect of good customer service on retention and recruitment, the NRC-DR also points out that as in the private sector, a prospective foster family's perception of how they are treated by an agency affects their decision to become and stay licensed and whether they spread positive or negative word-of-mouth messages to other potential families.

According to the NRC-DR, delivering good customer service to foster parents requires agency-wide commitment to customer service standards that are evident in all interactions staff have with each other (an agency's internal customers) and with external customers (e.g., children and youth, birth parents, courts, contractors, and community partners). This is because high-quality and sustainable customer service requires a cultural change within an agency. Recognizing that incorporating customer service concepts into recruitment and retention practices may involve broader system changes than only those specific to adoption and foster care programs, the NRC-DR outlines an approach that child welfare agencies can use to guide their efforts. This approach includes establishing a vision for good customer service, assessing the current situation and developing recommendations for initial and long-term scope of work, establishing customer service standards and implementation plans, piloting and then fully implementing customer service improvements, and engaging in continuous quality improvement by systematically obtaining and incorporating feedback for continuous improvement.

³⁴ We held 5 focus groups with contractors in January and February 2019, including 3 focus groups in Maricopa County and 2 focus groups in Pima County. One contractor was unable to attend any of the focus groups, so we spoke to this contractor by phone in February 2019. In total, we spoke to representatives from more than 20 of the Department's approximately 30 contractors.

³⁵ Goodman, D. & Steinfeld, F. (2012). *Building successful resource families: A guide for public agencies*. Baltimore, MD: The Annie E. Casey Foundation. Retrieved 10/3/18 from <https://www.aecf.org/resources/building-successful-resource-families/>.

³⁶ Goodman & Steinfeld, 2012; NRC-DR, 2013.

³⁷ NRC-DR, 2013.

Other states have also taken action to improve customer service

Several other states have taken action to improve customer service. For example, Florida's Department of Children and Families implemented the Quality Parenting Initiative (QPI) and requires caseworkers and foster parents to develop a partnership plan together. According to the QPI website, QPI is "an approach strengthening foster care, refocusing on excellent parenting for all children in the child welfare system." QPI provides a process to define the expectations of foster parents, provide training and support, and include them as a member of their foster child's team. Another aspect of QPI is to treat foster parents as partners in decision making in policy and practice improvements across the system. According to the QPI website, as of 2018, over 75 jurisdictions in 10 states had implemented QPI, including jurisdictions in California, Nevada, and Texas. In Florida, the partnership plan includes foster parent participation in all team meetings or court hearings and requires caseworkers to provide alternative participation methods for foster parents who cannot be physically present. In San Diego County, California, QPI was implemented with a goal of retaining high-quality foster parents, and in both Florida and San Diego County, caseworkers commit to promptly returning foster parent calls within 24 hours.

Recommendation

1. The Department should develop and implement a customer service model to improve foster parent recruitment and retention and engage in continuous quality improvement (i.e., systematically obtaining and incorporating feedback) to ensure the model's successful implementation.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendation.

Issue 2: Foster parents have provided consistent feedback indicating a need for more information about children in their care

Statute requires Department to provide foster parents with pertinent information about children in their care

A.R.S. §8-514(D) requires the Department to provide foster parents with a written summary of known, unprivileged information about a child when the child is placed with them. For example, this statute requires the Department to provide information on the child's age, family members, previous placement, and known and available medical history. In addition, A.R.S. §8-530(A)(4) states that foster parents have the right to be informed of all information regarding a foster child that will impact the foster home or family life while caring for the child. A.R.S. §8-512.01(A), also known as Jacob's Law, states that if a dependent child in the Department's legal custody is placed in out-of-home care, such as in a foster home or group home, the Department should immediately provide the caregiver with an updated and complete placement packet.³⁸

The Department's policy is to provide this information through a written placement packet, which is a set of documents containing key information needed for a foster parent to understand the needs of a foster child, including medical and school records.³⁹ The Department's placement packet includes a checklist of the information that should be provided in the packet and a checklist of information that foster parents should update once the child is in their care (see Appendix B, page b-1, for these checklists).

³⁸ Although statute and Department policy state that information should be provided immediately, a Department guidance document for foster parents says that the packet must be provided "at the time of placement or within 5 days."

³⁹ AAC R21-6-101(58).

Foster parent feedback has consistently cited the lack of adequate information about children in their care

According to the results of the 2014 survey of actively licensed foster parents, less than half of the respondents reported receiving adequate background information about the children placed in their home. In the 2017 survey, foster parents cited a lack of communication and transparency about the children being placed in foster homes as a barrier to becoming or staying licensed. Additionally, the Department's 2018 East Valley focus group summary indicated that participants expressed a need for full disclosure from the Department and stated that there were many stories of families not getting all the information they needed about a child. The 2018 Tucson focus group summary also noted that "Both [contractors] and the Department need to be more forthcoming about the information on children."

The foster parents we spoke to expressed similar concerns. Most foster parents described receiving little to no information about the child(ren) they cared for at the time of placement, such as information about a child's medications, the circumstances that led to the child's removal from the home, and the existence of medical and/or behavioral issues. Foster parents explained that not receiving complete placement packets caused them a great deal of frustration because the information in the packets is important to properly care for the children placed in their care. For example:

- A former foster parent reported that a child was placed in her care who had specific medical conditions that the Department had not shared with her. She reported that the child had an instance of anaphylactic shock due to an allergen exposure because she was unaware of these medical conditions.
- A former foster parent reported that a child was placed in her care who had a contagious condition that she was not told about. She felt that this condition could have jeopardized the health of her entire family.
- A foster parent reported that the age listed in the placement packet for a child in his care was incorrect. Additionally, he reported that although the child arrived in his care with a prescription bottle, the placement packet indicated that the child was not taking any medications. This prescription had no refills and the foster parent had great difficulty getting the prescription filled for the child. The foster parent expressed frustration with this situation and described contacting the child's caseworker for assistance, as well as the Department contractor supporting him, the doctor's office listed on the bottle, and the pharmacy listed on the bottle. He felt that "no one was helpful."

Other stakeholders provided similar feedback

Many contractors we spoke to similarly reported that the Department does not provide completed placement packets to foster parents. Contractors reported that when foster parents do not receive important information about the children in their care, it can lead to the foster arrangement being unsuccessful and a foster parent closing their license. For example, 1 contractor reported that it provided the Department with a list of the top 10 stressors that foster parents have in working with the Department and that "lack of information about the foster child" ranked at number 5.

Similarly, the AZOCA reported that based on public complaints it has reviewed, foster parents are often given placement packets that are missing key information pertaining to a child's background, including their medical, behavioral, and educational needs. In the AZOCA's 2017 annual report, the AZOCA describes a complaint from a long-time foster mother who stated that the Department placed a child with her and did not provide a placement packet. This was especially concerning as the foster mother had been told by the child's previous foster mother that the child would require surgery. When the AZOCA contacted the Department, the Department confirmed that it did not provide a placement packet. The Department later provided the mother with a packet, but it was largely blank. The AZOCA again intervened, and the family eventually received the missing information.

Some information was missing from placement packets we reviewed for emergency placements

Finally, we reviewed the placement packets for 6 children initially placed in foster homes who we either observed enter the Department's Maricopa Welcome Center on May 3, 2019, or who were siblings of a child we observed.⁴⁰ We selected specific packet information to review based on relative importance and auditability and did not review the packets for all required information. Through this review, we noted instances in which the Department had access to specific information about a foster child but did not provide this information in the placement packet.⁴¹ For example, 4 of the 6 packets were missing available information about siblings and the reason the child was in the Department's care. Another packet did not include information about a 4-year-old child's previous foster home placement or behaviors that had contributed to that child's removal from the previous foster home.

Department plans to provide placement packet information through online portal

Department leadership reported that it is addressing placement packet deficiencies in 2 ways. First, the Department plans to provide caregivers direct online portal access to placement packet information when it implements its new case management system, which is scheduled for July 2020. Second, the Department reported that its medical onboarding program helps ensure that foster parents have important medical and behavioral health information about children in their care. Through this program, Department staff contact foster parents to verify that children in their care have received necessary medical and dental services. During this contact, Department staff should ask if the foster parent received a placement packet. According to the Department, if the foster parent states that they did not receive a packet, Department staff are required to follow up and provide the packet.

Recommendation

2. As required by statute, the Department should provide foster parents with complete, updated written placement packet information upon placement of children with foster parents. The Department should also monitor caseworker provision of placement packets to foster parents and obtain feedback from foster parents regarding their receipt of complete placement packets through its implementation of Recommendation 1 above.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendation.

Issue 3: Department data may not fully reflect reasons for foster home license closure in all cases

When a foster parent closes his/her license, the foster parent completes a form describing the reasons for closing the license and provides it to the contractor supporting the foster parent. The contractor summarizes this information in the Department's licensing database and selects 1 of several pre-categorized reasons as the reason for closure. The Department uses this data to compile and publicly report on the reasons foster parents close their licenses. According to Department data for fiscal years 2017 through 2019, the most frequently cited reason for license closure was a child achieving permanency through adoption, guardianship, or reunification with family. Other reasons for closure include other time commitments and priorities of the foster parent(s), personal or private reasons, and administrative closures for expired licenses or unresponsive foster parents.

⁴⁰ The purpose of the Welcome Center is to provide a central location to care for newly removed and/or disrupted children.

⁴¹ We compared Department records on these children and information we learned during our observation with specific information provided to foster parents in their placement packets. There may be situations in which a child comes into the Department's care for whom the Department does not have all of the required information. For example, if a child is removed from the home in an emergency, the Department might not know what medications the child requires.

According to the data, approximately 2 to 3 percent of foster parents closed their license because they were dissatisfied or disgruntled with their experience.

However, foster parents may be closing their licenses because of dissatisfaction with their experience more often than Department data suggests. Given foster parents' feedback, we reviewed this data for 14 former foster parents that participated in our focus groups. In 11 of the 14 cases, the reasons foster parents told us they closed their licenses did not match the reasons in the database. In 4 of these cases, foster parents indicated to us that they closed their license, at least in part, because they were dissatisfied or disgruntled, but the database reflected other reasons, including reunification with a kinship placement, personal/private reasons, or other time commitments/priorities.

A potential reason for this inconsistency is that foster parents may have provided different reasons to us than to their contractors when they closed their licenses. Another potential reason could be that when a foster parent has multiple reasons for closing his/her license, the database allows contractors to enter only 1 closure reason. Additionally, the Department reported that it does not have policies or provide training or guidance to contractors for this process unless a contractor contacts the Department with questions.

Recommendation

3. The Department should review the data collection procedures for why foster parents close their licenses and identify and implement opportunities to improve data quality. This should include allowing for more than 1 reason for license closure to be selected, providing more guidance to contractors on how to gather and enter information, and considering other methods of collecting this data, such as an anonymous web survey.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendation.



Department's and contractors' inadequate intake practices could impede foster home recruitment efforts

Intake is an important recruitment responsibility shared by Department and its contractors

The Department requires its foster home recruitment and support contractors (contractors) to handle phone calls from prospective foster parents. These prospective foster parents may opt to call either a contractor or the Department to learn more about foster care and ultimately be directed to orientation videos and a pre-service training class. Handling these calls is often referred to as “intake” and is an important first step in the recruiting and development of a prospective foster parent.

Best practices specify that intake should be timely, welcoming, and linguistically appropriate

AECF has developed specific guidance for intake to help ensure that prospective foster parents feel welcomed and encouraged so that they move forward in pursuing a foster license.⁴² According to AECF, this initial phone call should not make foster parents feel that they are being judged or screened out, and calls should be answered by a live staff member. Additionally, if the prospective foster parent calls after business hours, the call should be returned on the next business day. AECF also suggests that child protective agencies, like the Department, place “secret shopper calls” with their contractors so that they can evaluate the quality of the overall intake experience. AECF provides a template that agencies can use to make these phone calls. The template evaluates the intake experience through 12 questions addressing if a live person answered the call, if the caller was invited to an orientation, if the call was rushed, if the person answering the call was welcoming and friendly, and other topics.

In order to accommodate as many foster parents as possible, AECF further states that agencies must accommodate non-English-speaking callers. This practice is consistent with federal laws that specifically require child welfare agencies to recruit culturally and ethnically diverse foster and adoptive families and provide services in a linguistically appropriate manner. In order to comply with these requirements, the Department's contracts require that its contractors field inquiries from prospective foster parents, as well as maintain a website with information in both English and Spanish about how to become a foster parent. Additionally, the Department maintains a policy that it and all of its contractors offer language assistance to non-English-speaking families.

⁴² Goodman, D. & Steinfield, F. (2012). *Building successful resource families: A guide for public agencies*. Baltimore, MD. The Annie E. Casey Foundation. Retrieved 10/3/2018 from <https://www.aecf.org/resources/building-successful-resource-families/>.

Department and contractor intake practices were mixed for our English-speaking phone calls and poor for our Spanish-speaking phone calls, including unreturned calls and no Spanish speakers

We conducted 2 series of secret shopper calls posing as prospective foster parents to evaluate the contractors' and Department's intake practices using AECF's template.⁴³ The first series of calls were made in English, and the second series of calls were made in Spanish in order to evaluate the contractors' and Department's ability to accommodate Spanish-speaking callers. Both series of calls involved calling 10 randomly selected contractors and the Department's designated intake phone number (KIDS-NEEDU). For the contractors we called in Spanish, we also checked whether they maintained a website with Spanish-language information about becoming a foster parent, as their contracts require.

- **Contractor and Department performance was mixed for our English-speaking calls**—Our calls to the 10 contractors found:
 - 5 contractors had an automated answering system in place (rather than a live person), and 2 contractors had a full voicemail box, which meant we were unable to leave a voicemail and thus unable to receive a return phone call from the contractor. It took multiple calls over more than 3 weeks for us to reach a live representative at 1 contractor, and we were unable to leave a message due to a full voicemail box.
 - 1 contractor never returned our phone calls (we left messages multiple times).
 - 1 contractor rushed through the call in approximately 30 seconds, but the contractor sent us a follow-up email with more information.
 - Although the call should not be a mechanism to screen individuals and instead should be a helpful mechanism to provide information to prospective foster parents, 1 contractor conducted a 10-minute phone screening asking questions such as marital status, employment, the size of the home, and others who live there; and another contractor sent a lengthy follow-up email with a very long list of requirements to become a foster parent.

Our call to the Department was initially answered by an automated message, but we were able to reach a live person. The responder appeared to be reading from a script, which AECF notes can appear forced, and did not ask if we had any questions or speak about children or fostering. The total call lasted for approximately 1 minute, although we were sent a follow-up email with more information.

- **Contractor and Department performance was generally poor for our Spanish-speaking calls and website review**—Our Spanish-speaking calls to the 10 contractors and review of their websites found:
 - Only 3 of the contractors were able to facilitate the call in Spanish, but they did not invite us to an orientation.
 - 2 contractors hung up on us and a third contractor stated loudly and repeatedly that she did not speak Spanish.
 - 2 contractors did not return our calls after we left a voicemail, and we were unable to leave a voicemail with another contractor because of a busy signal (we made only 1 attempt to call this contractor in Spanish because we spent 3 weeks attempting to reach a live person at this contractor for our calls in English, but were unable to do so).
 - Another contractor returned our first call and left us a voicemail, but we were unable to reach a live representative after returning the call twice.

⁴³ Our calls were made in December 2018 and January 2019. The contractors we contacted were awarded new Department contracts effective September 1, 2019.

- Only 2 contractors, and the Department, maintained a website with information in Spanish about how to become a foster parent.

We called the Department 3 times and were directed to the automated voicemail after following the prompts for Spanish each time we called. Despite leaving 2 separate voicemails, the Department never called us back.

Poor intake calls, like those we experienced, could impede foster home recruitment efforts

The experiences we had in making these calls, particularly the Spanish-speaking calls, could deter some prospective foster parents from pursuing licensure because of never being called back or not feeling welcomed. AECF notes that the experience of the first phone call often makes a difference in determining whether a prospective parent will continue with the process, and the goal is to generate additional interest in becoming a foster parent. Intake inadequacies we observed through our phone calls could ultimately impede contractor and Department recruitment efforts to increase and further diversify the number of foster homes, especially homes where English is not spoken or is a second language. For example, as shown in Figure 4 on page 11, the Department has estimated a need for more than 600 additional Hispanic foster homes.

Department did not monitor intake practices but has developed strategies to improve intake

The Department reported that it had not monitored its contractors' or its own intake practices. However, as a result of our secret shopper calls, the Department has developed strategies to improve its handling of intake calls. For example, the Department has implemented an internal tool to track incoming phone calls to the Department and, if necessary, follow up with prospective foster parents in a timely manner. According to the planning document for this effort, other planned actions include coaching and training Department staff to ensure communication with callers is positive, meeting with contractors to learn about their intake processes, working with the contractors to create standardized response times for following up on inquiries, and creating a database to track response times from contractors.

Recommendations

The Department should:

4. Develop and implement procedures—such as establishing expectations, guidance, and monitoring activities—to ensure contractors and Department staff adequately handle intake in English and Spanish, including answering or returning phone calls in a timely manner and meeting Department expectations for call quality.
5. Develop and implement procedures to ensure contractors maintain websites with information about how to become a foster parent in Spanish.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendations.



Department's monitoring of prior foster home recruitment and support contracts did not ensure contractors fulfilled several contract requirements

Department relies on contractors to help recruit and support foster homes

As discussed in the Introduction (see pages 2 through 3), for contracts ending October 30, 2019, the Department has approximately 30 contractors that help recruit and support foster and adoptive homes. Prospective foster and adoptive parents may work with any contractor that serves their area and can choose the contractor that is the best fit for them.

Because of the contractors' important role in enabling foster parents to succeed, it is critical that they adequately perform their responsibilities. Department leadership has explained that the contractors are primarily responsible for supporting and meeting the needs of foster parents. For example, in addition to recruiting foster parents, the contracts' scope of work requires that contractors track, support, monitor, provide ongoing training to, and retain a foster home once a child is placed in that home's care.

Department conducts some contract monitoring but has not ensured that its contractors perform several required functions

The Department performs some contract monitoring activities for its foster home recruitment and support contracts. For example:

- The Department's Office of Licensing and Regulation (OLR) reported that it began performing quarterly monitoring visits of contractors in spring 2018. During these visits, OLR staff review a small sample of foster parent licensing files for completeness, verbally summarize licensing issues that OLR has noted for that contractor, and answer contractors' questions. In 1 visit we observed, OLR staff reviewed files and noted instances where the contractor needed to gather more up-to-date information from the foster parents to add to their licensing file. For example, in reviewing licensing files, OLR staff noted that foster parents had a dog in the home but had not provided a record of the pet's vaccinations. During this visit, OLR staff also verbally summarized common or recent licensing issues that they had noticed during their processing of license applications and answered the contractor's questions.
- Department policy encourages staff, such as caseworkers or OLR staff, who have specific concerns with a contractor to submit a vendor performance review (VPR) to the Department's procurement team. The Department tracks these VPRs and, depending on the nature of the concern, reaches out to the contractor to correct the issue. Possible remedies for a VPR include monitoring of the concern, a corrective action plan, or a formal notification of vendor nonperformance referred to as a demand for assurance. Department staff reported that if a contractor has 2 or more formal notifications, it could result in termination of its contract. Department records show that from July 2015 to June 2019, the Department received 34 VPRs for 15 of the contractors, with none of the contractors receiving 2 or more demands for assurance in response to the concerns identified.

- The Department tracks its receipt of various reports that contractors are required to send. If contractors do not send the reports or are late in sending them, the Department works with the contractors to correct the situation.

Although these Department contract monitoring activities address some contractor requirements, we identified several core contractor responsibilities that the Department was not monitoring. Without monitoring these areas, the Department could not ensure that these responsibilities were fulfilled. Specifically:

- **Intake phone calls and website review**—As discussed in Finding 2 (see pages 27 through 29), the contracts require contractors to provide information and assistance to any family interested in foster care licensure. Additionally, contractors must provide information on becoming a foster parent in Spanish on their websites. However, we made test phone calls to 10 contractors in English and in Spanish and experienced difficulty reaching several contractors because of busy phone lines and full voicemail boxes, unreturned phone calls from some contractors, and contractors who did not speak Spanish or who did not invite us to an orientation for our calls in Spanish. In addition, we reviewed 10 contractors' websites to see if they provided Spanish-language information and assistance on their websites and noted that only 2 of the 10 contractors maintain Spanish-language information.
- **Providing foster homes with access to respite care**—The Department does not collect or track respite data from its contractors to ensure they are providing foster parents with the required respite hours.⁴⁴ The Department's contracts require contractors to offer, arrange for, and pay for each licensed foster home to have up to 144 hours of respite each fiscal year.

In our Phoenix-area focus groups with active and former foster parents, multiple foster parents reported challenges in accessing respite care through their contractor.

- **Additional requirements for foster licensing**—The contracts require that contractors seek Department approval prior to imposing any additional licensing requirements beyond those the Department has set in administrative rule or within contract requirements. Department staff reported that this requirement was intended to ensure that any additional requirements were appropriate and to list them on the Department's website. However, we noted several examples of contractors imposing additional licensure requirements without seeking this approval. For example, 1 contractor reported requiring foster parents to have a vehicle and driver license. Other contractors' websites show they require potential foster parents to sign a statement of faith affirming the potential foster parent's adherence to a specific set of religious beliefs. The Department does not collect or track these additional requirements and, thus, does not provide any information on these requirements to potential foster parents who are determining which contractor to select. Department staff reported that, in implementing the Department's new contracts, they plan to collect this information and create a tool for foster parents to use when selecting a contractor.
- **Recruitment and retention activities for foster parents**—Contractors are required to conduct foster home retention activities such as holiday parties or service award ceremonies that recognize foster parents. However, the Department has not performed any monitoring to ensure that these activities take place. Similarly, contractors are required to develop activities to attract families and individuals who reflect the ethnic and racial population of the children in need of foster care services. Department staff reported that they do not track these activities or require contractors to track and report them, although the Department reported that a staff person is aware of and attends events.

⁴⁴ Respite is the temporary care and supervision of a child in foster care to relieve a foster parent from caring for the child for a short time. For example, a foster family might request respite to take a vacation or attend a funeral out of state.

Department has begun implementing active contract management for its new foster home recruitment and support contracts

Best practice literature on both general procurement practices and practices specific to child welfare services, states that rigorous contract monitoring is required to ensure that contractors comply with contract terms.⁴⁵ For example, a report published by HHS on evaluating privatized child welfare programs emphasized the importance of contract monitoring.⁴⁶

To improve its contract monitoring, the Department has begun to apply an active contract management (ACM) approach (see textbox) for its new foster home recruitment and support contracts (effective September 1, 2019).⁴⁷ Specifically, the Department conducted a post-award meeting with its contractors on July 31, 2019. During this meeting, the Department shared information on its ACM approach and explained that ACM will help to improve management of the contracts and thus improve contract outcomes. Additionally, the Department created a draft workbook tool that it reported will facilitate management of the contracts. Contractors will be expected to complete the tool and fill in information related to contractor personnel, their available foster beds, children that are placed with their foster homes, and family support activities they have performed. The Department will then review the information documented in the tool with the contractors at the quarterly monitoring visits described previously. As part of these monitoring visits, the Department also plans to review contractor personnel files to ensure that contractor staff are qualified to carry out their responsibilities. Department staff further reported that it will use the workbooks to observe any system-wide trends, successes, or challenges and report this information to all contractors. Finally, the Department has hired an ACM Specialist who will assist in monitoring by liaising with contractors and analyzing contractor data.

Active contract management—A set of strategies that apply frequent data use and purposeful management of agency-contractor interactions to improve outcomes for contracted services.

ACM was developed by the Harvard Kennedy School's Government Performance Lab (GPL), which reported that the approach has been adopted by other agencies responsible for child welfare and other social services. Key components of the approach include frequent use of real-time performance data, routine and collaborative meetings between contracting agencies and contractors, and the development of performance management roadmaps to address issues that may otherwise not be reported on or analyzed.

Source: Auditor General staff review of active contract management literature.

Recommendation

6. The Department should continue implementing ACM for its new foster home recruitment and support contracts to help ensure that its contractors adequately perform core contract requirements, such as providing access to respite care and other requirements the Department deems critical to the contracts' success.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendation.

⁴⁵ National State Auditors Association. (2003). *Contracting for services: A National State Auditors Association best practices document*. Lexington, KY; Pindus, N., Zielewski, E., McCullough, C., & Lee, E. (2008). *Ensuring quality in contracted child welfare services*. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation; National Association of State Procurement Officers (NASPO). *NASPO contract administration: Best practices guide*. Retrieved 6/4/2019 from <https://www.naspo.org/ContractAdministrationBestPractices>.

⁴⁶ Pindus, et al., 2008.

⁴⁷ The Department reported that it began implementing ACM in July 2018 and that it has already implemented ACM for other contracts, including its in-home preservation and congregate care contracts.



SUMMARY OF RECOMMENDATIONS

Auditor General makes 6 recommendations to the Department

The Department should:

1. Develop and implement a customer service model to improve foster parent recruitment and retention and engage in continuous quality improvement (i.e., systematically obtaining and incorporating feedback) to ensure the model's successful implementation (see Finding 1, pages 17 through 22, for more information).
2. As required by statute, provide foster parents with complete, updated written placement packet information upon placement of children with foster parents. The Department should also monitor caseworker provision of placement packets to foster parents and obtain feedback from foster parents regarding their receipt of complete placement packets through its implementation of Recommendation 1 above (see Finding 1, pages 22 through 24, for more information).
3. Review the data collection procedures for why foster parents close their licenses and identify and implement opportunities to improve data quality. This should include allowing for more than 1 reason for license closure to be selected, providing more guidance to contractors on how to gather and enter information, and considering other methods of collecting this data, such as an anonymous web survey (see Finding 1, pages 24 through 25, for more information).
4. Develop and implement procedures—such as establishing expectations, guidance, and monitoring activities—to ensure contractors and Department staff adequately handle intake in English and Spanish, including answering or returning phone calls in a timely manner and meeting Department expectations for call quality (see Finding 2, pages 27 through 29, for more information).
5. Develop and implement procedures to ensure contractors maintain websites with information about how to become a foster parent in Spanish (see Finding 2, pages 27 through 29, for more information).
6. Continue implementing ACM for its new foster home recruitment and support contracts to help ensure that its contractors adequately perform core contract requirements, such as providing access to respite care and other requirements the Department deems critical to the contracts' success (see Finding 3, pages 31 through 33, for more information).



Contractor responsibilities

As discussed in the Introduction (see pages 2 through 3), for contracts ending October 30, 2019, the Department had approximately 30 contractors that help recruit and support foster and adoptive homes. These contracts required contractors to perform various services, sometimes in conjunction with Department efforts. According to the scope of work for these contracts, contracted services related to foster homes include:

- **Recruiting foster homes**—Contractors are required to develop recruitment activities and participate in Department recruitment campaigns, provide information and assistance to families interested in licensure, and maintain a website with information in English and Spanish on how to become a foster parent. Interested families can contact a contractor or the Department via telephone or email to begin the licensure process. (If contacted directly, the Department will direct an interested family to select a contractor to begin the process.) In addition, the contractors should survey foster parents who have closed their licenses while in good standing to determine those who are willing to reopen their license or become relicensed. The contracts indicate that contractors should consider offering existing foster parents an incentive for recruiting new foster parents, recognizing that foster parents are the best recruiters of additional foster parents.
- **Conducting orientations**—Contractors are required to conduct general information orientations for prospective foster parents. The Department created a 5-part YouTube video orientation that provides a general overview of the steps to becoming a foster parent, including the licensing process, what to expect as a foster parent, what foster children are like, and laws and policies regarding foster care. The orientation is available to anyone who accesses the Department’s website, or it can be viewed at a contractor orientation session where presenters are available to answer questions and concerns about becoming a foster parent. The orientations also provide information about opportunities to help foster children if providing foster care is not an option, such as volunteering for a contractor, donating money, or becoming a court-appointed special advocate (CASA).⁴⁸
- **Training foster parents**—Contractors are required to ensure that foster families complete their pre-service training, which is delivered through the FPC. The contractors also provide ongoing training for licensed foster parents on a wide range of topics, such as working with autistic children and managing children with eating disorders.
- **Conducting the home study and assisting with licensure**—Contractors are responsible for completing the home study and work with foster parents to complete and submit applications for both initial and renewal licenses. The contractors also help foster parents prepare for the life-safety inspections that the Department’s OLR staff perform. OLR staff then review completed license applications and determine whether to issue the licenses to applicants.
- **Identifying potential foster home placements**—Contractors are responsible for working with Department staff to find appropriate foster home placements for children. They are required to maintain, update, and ensure the accuracy of information about foster homes and their license parameters in the Department’s licensure database and to provide the Department daily reports on available beds in foster homes. If a foster parent requests that a foster child be removed and placed elsewhere, the contractor is required to notify the Department and work with the foster family to preserve the placement, if possible. This can include meeting

⁴⁸ CASA volunteers are appointed by judges to advocate for the best interests of abused and neglected children in court and other settings.

with the foster family to determine what additional supports can be provided to prevent removal, such as mental health services or trauma-informed training, and ensuring foster parents have access to support groups and mentors. Otherwise, the contractor should work with the Department to find a new placement for the child.

- **Supervising and supporting foster homes**—The contractors are required to supervise foster homes where a child is placed by personally visiting the homes periodically. The frequency of these visits is outlined in the contracts and depends on factors such as how long the home has been licensed or when a child was placed in the home. For example, contractors are required to visit newly licensed foster parents weekly during the first month of a child’s placement in the home and experienced foster parents quarterly. Contractors are also required to develop individualized support and training plans for each foster home, which should be reviewed with the foster parent and updated quarterly. These plans should include information on training and services that are requested or needed, available crisis intervention services, and any other supports specific to the family or child. The contractors should provide necessary services to help foster families maintain placements and develop and make available support groups or offer participation in already established support groups.
- **Identifying respite care options for foster parents**—The contractors are required to offer, arrange, and pay (to be reimbursed by the Department) for each foster home to have up to 144 hours of respite each fiscal year. Respite is the temporary care and supervision of a foster child to relieve a foster parent from caring for the child for a short time. For example, a foster family might request respite to take a vacation or attend a funeral out of state. Respite is provided by other foster parents, who can provide this care as part of their license, or by individuals licensed to provide only respite care.

Placement packet checklists

Figure 5 is the first page of the Department’s placement packet, which includes (1) a checklist of information that Department staff should provide in the packet and (2) a checklist of information that should be updated by a child’s out-of-home care provider.

Figure 5
Placement packet checklists

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ARIZONA DEPARTMENT OF CHILD SAFETY

PLACEMENT PACKET CHECKLIST
INFORMATION FOR OUT-OF-HOME CARE PROVIDERS
THIS PACKET CONTAINS CONFIDENTIAL INFORMATION

CHILD'S NAME (Last, First, M.I.)	DATE OF BIRTH	CHILDS Part. ID/CMDP No.	PLACEMENT DATE	TODAY'S DATE

CHILD SAFETY SPECIALIST'S RESPONSIBILITY
(CHILD SAFETY Specialist will provide the documents below at time of placement or when available or updated)

- Child Information
- Child's Health and Medical Records
- Child's Contact Record
- Child's Basic Wardrobe and Property Inventory
- Child Information Guide, if available from previous placement
- Notice to Providers - Out-of-Home Care, Educational, & Medical (CSO-1035A)
- Out-of-Home Care Provider Acknowledgment (CSO-1298A)
- Notice of Rights for a Child in Out-of-Home Care (CSO-1141A), provided to the child at initial placement.
- Notice to Caregivers about Medical/Dental Services
- Behavioral Health Services for Children in Out-of-Home Care
- Minute entries setting a future dependency or delinquency hearing regarding the child, if available.
- Most recent FCRB report, if available
- Child's immunization records
- Medical Summary Report
- Comprehensive Medical and Dental (CMDP) New Member Packet, also available online
- Child's Medical ID card (CMDP card)
- Case Plan
- Infant Care Plan (DCS-1262A), if applicable

OUT-OF-HOME CARE PROVIDER'S RESPONSIBILITY
(Out-of-Home Care Providers are to safeguard the above information and complete the following forms; additional available at <http://www.azdcs.gov> or by contacting your Child Safety Specialist and/or Licensing Worker)

- Child's Health and Medical Record
- Child's Allowance/Purchase Ledger
- Child's Contact Record
- Child's Basic Wardrobe and Property Inventory
- Child Information Guide to be filled out if child leaves
- Incident Report for Children in the Custody of the Department of Child Safety (DCS) *(available upon request)*

By signing below you agree to provide care and supervision for the above child, comply with current case plan, follow DCS discipline policy, safely transport the child, keep all of the child's information confidential, contact DCS immediately if any unusual incident occurs, and return the child's information if the child is removed from your care. You also agree to comply with the items listed on the Out-of-Home Care Provider Acknowledgement. You also agree that in the event of an overpayment, whether discovered by you or DCS, you will reimburse DCS. You agree to reimburse DCS upon demand or DCS may offset future payments to recover any amount paid to you in error.

Out-of-Home Care Provider's Signature: _____ DATE _____

DCS Representative's Signature: _____ DATE _____

Source: First page of the Department’s placement packet obtained from Department staff.



Objectives, scope, and methodology

The Office of the Auditor General completed this special report of the Department pursuant to Laws 2017, Ch. 311, §4. The report's objectives included reviewing the Department's practices for recruiting, licensing, using, and retaining foster parents.

Auditors used various methods to meet the report's objectives. These methods included interviewing Department management and staff and reviewing applicable Department statutes and rules; the Department's website; Department-provided documentation, including policies and procedures; and prior Auditor General reports. In addition, we used the following specific methods to meet the report objectives:

- We analyzed information from various Department reports and database systems to:
 - Determine trends in the number of children in out-of-home care and placement of these children using information from the Department's Monthly Operational and Outcome Reports.
 - Determine trends in the number of licensed foster homes and number of foster home beds, as well as information on the number of foster home beds in use as of June 30, 2019, using information from the Department's Monthly Operational and Outcome Reports and licensing database.
 - Review the Department's recruitment needs, using information from the Department's recruitment estimator tool for July 2019.
 - Assess the Department's attainment of its placement goals using metrics from its Statewide Placement Administration Scorecard reports.
- We reviewed The Annie E. Casey Foundation Child Trends analysis of federal fiscal year 2017 data from AFCARS, made available through the National Data Archive on Child Abuse and Neglect.
- We reviewed a Department report comparing its foster home licensure requirements to HHS model licensing standards. We also reviewed the Department's foster home licensure requirements and compared them to model family foster home licensing standards from NARA.
- We reviewed federal laws related to foster care, including Title IV-E of the Social Security Act, the Multi-Ethnic Placement Act, Department policy and HHS guidance related to Limited English Proficiency laws, and the Family First Prevention Services Act.
- We conducted 5 focus groups in January and February 2019 with the Department's foster home recruitment and support contractors. We held 3 focus groups in Maricopa County and 2 in Pima County. One contractor was unable to attend any of the focus groups, so we spoke to this contractor by phone in February 2019. In total, we spoke to representatives from more than 20 of the Department's approximately 30 contractors.
- We reviewed documentation from the Department's foster home recruitment and support contracts and compared the scopes of work for the prior contracts (which expire October 30, 2019) and the new contracts (effective September 1, 2019). We also attended the pre-bid conference meeting for the new contracts held on March 15, 2019, and reviewed Department-provided information on contractor payments for fiscal years 2017 through 2019 and fee schedules for foster homes and congregate care facilities.

- We conducted 6 focus groups in March and April of 2019 with current and former foster parents (who had closed their licenses in 2018) whom we randomly selected and invited to attend. We held 4 focus groups in Maricopa County and 2 in Pima County. We also received email input from 1 foster parent and interviewed 11 foster parents who were selected to participate in the focus groups but could not attend. Additionally, we interviewed 3 randomly selected foster parents located near Prescott and Yuma. In total, approximately 50 individuals took part in these focus groups and interviews.
- We reviewed the results of foster parent surveys the Department conducted in collaboration with ASU in 2014 and 2017 and foster parent focus groups the Department conducted in 2016 and 2018. Additionally, we reviewed Department licensing data on the reasons that 14 foster parents from our focus groups closed their licenses and compared this data to the reasons that the former foster parents provided to us in focus groups.
- We interviewed staff from the AZOCA and reviewed reports of their investigations into foster parent complaints.
- We reviewed best practice literature as cited throughout the report. This includes literature published by organizations such as AECF and the NRC-DR, who have worked directly with other jurisdictions and provided knowledge of other state practices. As part of our literature review, we also examined the QPI website and information published by the Florida Center for Child Welfare.
- We reviewed the Department's foster parent orientation videos and observed 2 pre-service training sessions Department contractors conducted, 1 home study a Department contractor completed, and 6 life-safety inspections Department staff completed. We also conducted an observation at the Department's Maricopa Welcome Center in May 2019 and reviewed case management system records for some children we observed at the center or their siblings.
- We conducted secret shopper calls in December 2018 and January 2019 posing as prospective foster parents to the Department and 10 contractors in both English and Spanish to assess intake practices and reviewed the contractors' websites.
- We reviewed information about the Department's recruitment campaigns and recruitment planning documents.
- We reviewed the Department's contract monitoring practices for its foster home recruitment and support contracts and observed Department staff complete 2 quarterly monitoring visits of different contractors.

We express appreciation to the Department's Director and staff for their cooperation and assistance throughout the audit.

DEPARTMENT RESPONSE



ARIZONA
DEPARTMENT
of CHILD SAFETY

Mike Faust, Director
Douglas A. Ducey, Governor

September 27, 2019

Ms. Lindsey Perry, CPA, CFE
Auditor General
Arizona Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018

Re: Auditor General's special report of the Arizona Department of Child Safety – Foster Home Recruitment, Licensure, Use, and Retention

Dear Ms. Perry:

The Arizona Department of Child Safety (Department) appreciates the opportunity to provide this response to the Auditor General's special report of the Arizona Department of Child Safety's – Foster Home Recruitment, Licensure, Use, and Retention. The Department will continue to demonstrate its commitment to the experiences of foster families and the children of Arizona.

The Department agrees with the findings and will implement the recommendations as indicated in the enclosed response. The collaborative effort of the Auditor General's staff as well as the consideration of the Department's feedback throughout the audit process is greatly appreciated. The Department looks forward to productively working with the Auditor General's staff on future audits.

Sincerely,

Mike Faust
Director

Enclosure: DCS Recommendation Response

Finding 1: Foster parent feedback indicates a need for improved Department customer service and more information about children in their care, which could help improve foster home recruitment and retention

Recommendation 1: The Department should develop and implement a customer service model to improve foster parent recruitment and retention and engage in continuous quality improvement (i.e., systematically obtaining and incorporating feedback) to ensure the model's successful implementation.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees there is an opportunity to improve staff interactions with contracted foster parents and licensing agencies. Just as the Department improved the foster parent experience by restructuring the licensing process, it has already begun and will continue to improve foster parent recruitment, licensing and retention by restructuring customer service models, incorporating additional child welfare practice standards into the Department's existing strategic initiatives, and using appropriate continuous quality improvement tools to do so.

Recommendation 2: The Department should, as required by statute, provide foster parents with complete, updated written placement packet information upon placement of children with foster parents. The Department should also monitor caseworker provision of placement packets to foster parents and obtain feedback from foster parents regarding their receipt of complete placement packets through its implementation of Recommendation 1 above.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees that, as provided by statute, it should provide complete, updated placement packets to foster parents upon placement of dependent children. The Department also agrees it should provide timely, pertinent available information to foster parents in accordance with policy and will continue to provide foster parents with placement packets. The Department will continue to conduct closed loop feedback on information conveyed to foster parents (including the receipt of placement packets) through the Department's Comprehensive Medical and Dental Plan (CMDP) Onboarding outreach. The development of a foster care portal in the new information management system (Guardian) will provide foster parents direct access to pertinent information about a child in their care.

Recommendation 3: The Department should review the data collection procedures for why foster parents close their licenses and identify and implement opportunities to improve data quality. This should include allowing for more than 1 reason for license closure to be selected, providing more guidance to contractors on how to gather and enter information, and considering other methods of collecting this data, such as an anonymous web survey.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department is in the process of implementing an improved data collection methodology utilizing basic surveying software to collect additional information and data to more accurately assess why foster families close their licenses. The Department will also evaluate the need to develop a fixed frequency survey (annual/bi-annual) of open and recently closed foster families' experiences utilizing statistically relevant sampling and methodology that includes appropriate outreach practices. This will allow the Department to collect sufficient information to inform future strategic planning initiatives. Additionally, the new Foster and Adoption Support (FAS) contract includes a requirement for contractors to administer a survey to capture broader reasons for closure.

Finding 2: Department's and contractors' inadequate intake practices could impede foster home recruitment efforts

Recommendation 4: The Department should develop and implement procedures—such as establishing expectations, guidance, and monitoring activities—to ensure contractors and Department staff adequately handle intake in English and Spanish, including answering or returning phone calls in a timely manner and meeting Department expectations for call quality.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department has implemented internal strategies to reduce or eliminate delays in responding to potential foster families. These strategies include processes and expectations for response timeliness and follow up standards. The Department has also begun implementing additional processes and oversight of the contractors' intake processes to ensure they meet call quality expectations.

Recommendation 5: The Department should develop and implement procedures to ensure contractors maintain websites with information about how to become a foster parent in Spanish.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: As described in the Department's rollout plan, implementation of Active Contract Management (ACM) will ensure contractors maintain their websites with information on how to become a foster and/or adoptive parent in English and Spanish as required in the FAS contract. Process implementation has already begun with the new FAS contract as planned.

Finding 3: Department's monitoring of prior foster home recruitment and support contracts did not ensure contractors fulfilled several contract requirements

Recommendation 6: The Department should continue implementing ACM for its new foster home recruitment and support contracts to help ensure that its contractors adequately perform core contract requirements, such as providing access to respite care and other requirements the Department deems critical to the contracts' success.

Department Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The implementation of ACM has been ongoing within the Department since 2018 following development in 2017 with technical support from Harvard Government Performance Lab and the Capacity Building Center for States. Process implementation has already begun with the FAS contract to provide oversight and ensure contract requirements are met.

