



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

Janice K. Brewer
Governor

Neal Young
Director

JUN 22 2009

Ms. Debbie Davenport
Auditor General
Office of the Auditor General
2910 North 44 Street, Suite 410
Phoenix, Arizona 85018

Dear Ms. Davenport:

The Department of Economic Security wishes to thank the Office of the Auditor General for the opportunity to respond to the recently completed audit of the Division of Children, Youth and Families—Child Protective Services—Congregate Care Performance Audit.

The Department agrees with and is currently implementing the recommendations. In regards to Recommendation 1.3, the Department agrees with the recommendation and a different method of dealing with the finding will be implemented.

If you have any questions, please contact Jakki Hillis, Acting Assistant Director, Division of Children, Youth and Families, at (602) 542-3598 or me at (602) 542-5757.

Sincerely,

Neal Young
Director

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY'S RESPONSE
TO THE OFFICE OF THE AUDITOR GENERAL'S REPORT
ON CONGREGATE CARE**

The Department's response to the Auditor General's recommendations is described below.

RECOMMENDATION 1.1:

To help facilitate the timeliness of congregate care investigations, the Division should:

- a. Implement the Division's action plan for the specialized investigative unit requiring the unit supervisor to revise the unit's procedures to more effectively use manual and online systems to track investigation activity, to update investigators weekly on upcoming investigation completion dates, and to increase contact with investigators to discuss ongoing investigations; and
- b. Ensure the specialized investigative unit remains fully staffed and do not routinely use the unit's investigative staff to assist with other investigative unit's workloads. If this is not possible due to staffing cuts, the Division should review and prioritize the specialized investigation unit's responsibilities to ensure tasks critical for ensuring child safety are performed; for example, completing investigations within 21 days.

DES Response:

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

A process has been developed to monitor investigative activities and the time frames for monitoring of these activities are being established.

RECOMMENDATION 1.2:

To help ensure that the information is available for management use in monitoring investigations' thoroughness, workload, and productivity, the supervisor of the specialized investigative unit should enforce division policy requiring staff to document case activity within 10 days of its occurrence.

DES Response:

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

A process has been developed to monitor investigative activities and the time frames for monitoring of these activities are being established.

RECOMMENDATION 1.3:

To better ensure child safety by making certain complete information is available for conducting child abuse background checks on congregate care employees, the Division should seek a statutory amendment clarifying that CPS has authority to investigate allegations of abuse and neglect in RTCs.

DES Response:

The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

The Division will explore the advisability of seeking a statutory amendment that codifies that CPS has authority to investigate allegations of abuse and neglect in the residential treatment centers (RTCs). As discussed with the Office of the Auditor General, the Department of Health Services investigates these types of allegations in RTCs, as they are the licensing authority. Because the Division does not believe that it currently has statutory authority to investigate these allegations, the Division will explore potential legislation through the Department's protocol for developing its annual legislative agenda. This protocol includes an assessment of the impact upon the Department of each suggested legislative proposal. The Division's Child Protective Services is responsible for investigating allegations of child abuse and neglect by parents, guardians, or custodians. If the term "custodian" is expanded to include RTC staff, analysis of the potential consequences of this expansion will be required. During times of diminishing resources, the Department must carefully weigh the benefits, resource needs and unintended consequences before voluntarily proposing legislation that would increase the responsibility of Child Protective Services by adding more investigations to the current caseload.

RECOMMENDATION 2.1:

The Division should review and revise the outcomes within its congregate care contracts to ensure that they meet established criteria: they are clear, include measurable indicators of performance, and contain specific performance targets.

DES Response:

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

A process has been established to review and re-define the outcome measures for congregate care contracts as they are solicited.

RECOMMENDATION 2.2:

The Division should enforce the requirement that congregate care providers submit required outcome data to the Division. Additionally, the Division should ensure that it compiles the necessary outcome data for those congregate care outcomes it is responsible for tracking.

DES Response:

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

A process has been established to review and re-define the reporting of outcome measures for congregate care contracts as they are solicited.

RECOMMENDATION 2.3:

As part of its ongoing efforts to reprioritize its responsibilities in response to budget cuts, the Division should determine the importance of using outcome data to monitor congregate care provider performance, including using the data as additional criteria for yearly contract renewal and as the basis for helping providers identify problems and correct deficiencies, and assign staff accordingly.

DES Response:

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