



A REPORT
TO THE
ARIZONA LEGISLATURE

Performance Audit Division

Special Report

Arizona Department of Child Safety

Compared to National Averages, Arizona's Number of Child Abuse or Neglect Reports Has Been Similar or Higher and Its Substantiation Rate Lower, and the Office of Child Welfare Investigations Is Unique Among States

March • 2015
Report No. 15-101



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Auditor General

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March 13, 2015

Members of the Arizona Legislature

The Honorable Doug Ducey, Governor

Mr. Gregory McKay, Director
Arizona Department of Child Safety

Transmitted herewith is a report of the Auditor General, *A Special Report of the Arizona Department of Child Safety—Child Abuse or Neglect Reports, Substantiation Rate, and Office of Child Welfare Investigations*. This report is in response to Laws 2014, Ch. 11, §24, 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 for this audit to provide a quick summary for your convenience.

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

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

Sincerely,

Debbie Davenport
Auditor General

Attachment



REPORT HIGHLIGHTS SPECIAL REPORT

Our Conclusion

This report is in response to 2014 legislation that asked the Office of the Auditor General to report on the number of child abuse or neglect reports and the rate of substantiated child abuse or neglect cases in Arizona compared to other states, as well as the number of states with an office similar to Arizona's Office of Child Welfare Investigations (OCWI). We found that the number of child abuse or neglect reports in Arizona has been similar to or exceeded the national average and although Arizona's substantiation rate has been increasing, it was below the national average. Finally, based on information provided by investigative agencies from 25 states, Texas is the only state we identified with a unit similar to Arizona's OCWI that investigates criminal allegations of child abuse or neglect. The other states' investigative agencies indicated that child abuse investigations involve two parties—child safety caseworkers and law enforcement—but not a third investigative unit.



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Arizona's number of child abuse or neglect reports has been similar to or exceeded the national average, while its substantiation rate was below the national average

Child abuse or neglect reports and investigations—The Arizona Department of Child Safety (Department) receives and investigates allegations of child abuse or neglect. It receives these allegations through its Child Abuse Hotline, where calls are screened to determine if the allegation(s) constitutes a report for investigation. Reports involving criminal conduct are jointly investigated by a department caseworker, law enforcement, and an OCWI investigator in Maricopa and Pima Counties. OCWI investigators have different functions than department caseworkers, including different response times and documentation responsibilities. For fiscal year 2015, the Legislature expanded OCWI from 28 to 127 full-time staff, with 65 positions filled as of February 2015.

Criminal conduct—Conduct by a parent, guardian, custodian, or adult member of a child's household that, if true, would constitute child abuse, domestic violence, sexual abuse or assault, or any other felony abuse.

Substantiation—Refers to the process of determining whether there are facts to support a conclusion that abuse or neglect occurred.

Arizona's number of child abuse or neglect reports has increased and has been similar to or exceeded the national average—The Department has received an increasing number of child abuse or neglect reports annually, ranging between 33,000 and 44,000 reports in federal fiscal years 2008 and 2013. Although the number of Arizona reports compared similarly to the national average in federal fiscal years 2008 through 2010, the number of reports exceeded the national average in federal fiscal years 2011 through 2013. According to the Department, 2009 legislative changes that expanded the definitions of abuse and neglect and changes to the Department's Child Abuse Hotline screening tool may have contributed to the increased number of reports.

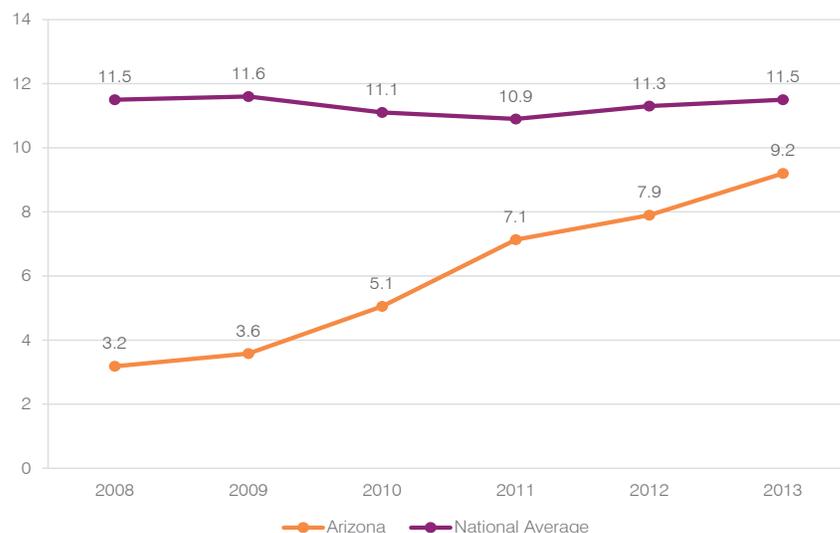
Arizona's substantiation rate was below the national average, but has been increasing—Arizona's annual rate of substantiation grew from 3.2 to 9.2 cases of child abuse or neglect per 1,000 children between federal fiscal years 2008 to 2013. This was a lower rate than the national average, which ranged from 10.9 to 11.6 substantiated cases per 1,000 children for the same time period (see figure on next page). Legislative changes expanding the definitions of abuse and neglect and requiring substantiation when a child became a legal dependent of the Department likely contributed to the increase in Arizona's substantiation rate.

Arizona's investigative approach for criminal child abuse and neglect allegations largely unique among states surveyed

Texas investigative unit similar to OCWI—Based on the information provided by child welfare investigative agencies in 25 states, we found that Texas was the only state with an investigative unit similar to Arizona's OCWI. The Texas Department of

Family and Protective Services (Texas Department) employs special investigators (SI) with a law enforcement background to assist Texas department caseworkers, focus on forensic aspects of an investigation, and coordinate with law enforcement. These responsibilities are similar to those of an OCWI investigator. However, Texas law does not require an SI's involvement in an investigation, and an SI only becomes involved in an investigation at the request of a Texas caseworker. Conversely, Arizona law requires an OCWI investigator's involvement in an investigation involving criminal conduct. In addition, a Texas caseworker, not an SI, makes the final decision on whether to remove a child from the home, whereas an OCWI investigator makes that decision in Arizona.

**Number of substantiated Arizona cases of child abuse or neglect per 1,000 children compared to the national average
Federal fiscal years 2008 through 2013**



Texas reported no redundancy, but took steps to improve collaboration—The Texas Department indicated that having two staff involved in an investigation—the caseworker and the SI—is not redundant, but helps to ensure appropriate decision making. To address initial collaboration issues, the Texas Department housed its SIs and caseworkers at the same location to help reinforce the goal of child protection, SI staff reported that they conducted brief outreach presentations with caseworkers explaining their role, and SIs and caseworkers are jointly trained.

Arizona redundancy issues largely addressed, but Department should continue to improve collaboration—Although there were some initial redundancy concerns in the work performed by OCWI investigators and department caseworkers, these have largely been resolved. However, the Department should continue to take various actions to improve collaboration. For example, the Department has three co-location units that may house caseworkers, OCWI investigators, law enforcement, and/or other professionals and should continue this effort as OCWI expands. The Department should also work with the Maricopa and Pima County Attorneys to update county investigative protocols to reflect OCWI's role. These protocols should foster better coordination between local law enforcement and OCWI staff. Finally, the Department should conduct additional training regarding the roles of the department caseworker and the OCWI investigator.

Recommendations

The Department should:

- Continue its efforts to co-locate OCWI staff, caseworkers, and other staff;
- Work with the Maricopa and Pima County Attorneys to update investigation protocols; and
- Enhance its training related to criminal conduct investigations.

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INTRODUCTION

Scope and Objectives

As required by Laws 2014, Ch.11, §24, the Office of the Auditor General has completed a special report that addresses:

(1) Arizona's number of reports of child abuse or neglect compared to the average number of reports in other states (see Chapter 1, pages 5 through 7);

(2) Arizona's rate of substantiated cases of child abuse or neglect compared to other states (see Chapter 1, pages 7 through 10); and

(3) The number of states with a child safety organization similar to Arizona's Office of Child Welfare Investigations (OCWI), including a description of how these states avoid redundancies among parties involved in criminal abuse investigations (see Chapter 2, pages 11 through 16).

This audit was conducted under the authority vested in the Auditor General by Arizona Revised Statutes (A.R.S.) §41-1279.03.

Investigating reports of child abuse or neglect

Reporting and investigation process

The Arizona Department of Child Safety (Department) is responsible for receiving and investigating allegations of child abuse or neglect. As part of this process, the Department must also determine whether it should substantiate the allegations it investigates. The Department's process for receiving, investigating, and determining the disposition of allegations includes four main steps. Specifically:

- **Hotline calls received**—Allegations of child abuse or neglect (see textbox) are reported through a centralized department telephone line, called the Child Abuse Hotline. Although anyone can call the hotline to report suspected abuse or neglect, state law requires mandatory reporting by certain individuals, such as doctors and teachers.
- **Calls screened**—Department staff screen hotline calls to determine whether or not the allegation(s) constitutes a report for investigation. According to department policy, calls are categorized as reports for investigation if they allege that (1) a victim under the age of 18 has been physically, emotionally, or sexually abused, neglected, abandoned, or exploited by a parent, guardian, custodian, or adult member of the victim's household who has or may have inflicted, permitted another person to inflict, or had reason to know another person may inflict abuse or neglect on the child, and (2) the victim is a resident of or present in Arizona or the alleged abuse or neglect occurred in Arizona. Allegations of abuse or neglect by someone other than the victim's parent, guardian, custodian or adult member of the victim's household without the knowledge of the child's parent, guardian, or custodian are referred to law enforcement.
- **Reports assigned for investigation**—Department hotline staff assign a priority level and response time to each report that requires investigation.

Abuse—The infliction or allowing of physical injury, impairment of bodily function, or disfigurement or the infliction of or allowing another person to cause serious emotional damage, which includes sexual abuse and unreasonable confinement.

Neglect—The inability or unwillingness of a parent, guardian, or custodian of a child to provide that child with supervision, food, clothing, shelter or medical care if that inability causes unreasonable risk of harm to the child's health or welfare. Neglect includes prenatal drug exposure as well as exposure to sexual conduct.

Source: A.R.S. §8-201

Standard response times range from 2 hours to 7 days based on the assigned priority. Reports that involve allegations of criminal conduct (see textbox) are assigned for joint investigation to a department caseworker, law enforcement, and, in Maricopa and Pima Counties, the Department's OCWI (see below for more information about this office).

- **Investigative finding determined**—Reports of abuse or neglect may be substantiated when the Department or the juvenile court finds probable cause to believe child abuse or neglect occurred (see textbox) and after the alleged perpetrator has been afforded his/her due process rights.^{1,2} Once an allegation is substantiated, the Department places information about the perpetrator into a central registry.³

Definitions:

Criminal conduct—Conduct by a parent, guardian, custodian, or adult member of a child's household that, if true, would constitute child abuse, domestic violence, sexual abuse or assault, or any other felony abuse.

Substantiation—Refers to the process of determining whether there are facts to support a conclusion that abuse or neglect occurred.

Source: A.R.S. §8-201(8) and Auditor General staff summary of information contained in the Department's policy and procedure manual.

Office of Child Welfare Investigations

The OCWI is a special investigative unit within the Department responsible for investigating allegations of criminal conduct. The OCWI was established in 2012 based on a recommendation from the Arizona Child Safety Task Force, with the intention of improving investigations of child abuse or neglect.⁴ Although the OCWI is part of the Department and works jointly with department caseworkers on investigations, OCWI investigators differ from department caseworkers in the following ways:

- **Specific and distinct job functions**—The Department's policy manual outlines the OCWI investigators' and department caseworkers' different responsibilities. For example, the manual states that OCWI investigators have different investigative response times than department caseworkers and different documentation responsibilities. In addition, OCWI investigators have the primary responsibility to decide when to remove a child from his/her home, while the department caseworker's role is more consultative on criminal conduct investigations.

¹ Probable cause is established when the information gathered during the investigation would lead a reasonable person to believe that an incident of abuse or neglect occurred, and that the abuse or neglect was committed by the parent, guardian, or custodian.

² A.R.S. §8-804(A) requires that a finding made by the juvenile court that a child is dependent based on an allegation of abuse or neglect be recorded as a substantiated abuse or neglect finding.

³ By state law, the central registry may be used to conduct background checks as one factor to determine the qualifications of persons applying to become a licensed, certified, or registered child caregiver, such as a foster parent or childcare provider for four or fewer children, or seeking state employment in a position providing direct services to children or vulnerable adults. The central registry may also be used to provide state-wide statistical information on the occurrence of child abuse and neglect and for department staff review of prior reports of abuse and neglect when conducting investigations.

⁴ The Arizona Child Safety Task Force was established in 2011 by Arizona's governor, which, according to the Department, was in response to multiple high-profile child deaths in Arizona. The Task Force included representatives from a variety of disciplines, including state government, law, medicine, and social work, and was tasked with engaging experts to offer professional advice, expertise, and testimony in a variety of child welfare areas, including investigations.

- **Hiring criteria**—In hiring OCWI investigators, the Department looks for candidates who have a minimum of 3 to 5 years of investigative experience, depending on their education.
- **Training requirements**—OCWI staff reported that, although OCWI investigators are required to complete most of the Department's new staff training, the OCWI also conducts its own in-house training for new investigators. This training includes field observations, as well as competency testing of investigative techniques and joint-investigation policies and procedures.
- **Access to resources**—OCWI staff reported that because the OCWI is a certified criminal justice agency, it has access to Federal Bureau of Investigation databases not accessible to other department personnel.

OCWI investigators have historically been assigned only to criminal conduct cases in Maricopa and Pima Counties involving children under the age of 6, which the OCWI reported was due to limited staff resources. However, the Department reported that the OCWI may periodically conduct investigations in other counties for high-profile cases or upon request. The OCWI's initial appropriation in fiscal year 2013 included funding for 28 full-time equivalent (FTE) staff positions. For fiscal year 2015, the Legislature appropriated additional monies to expand the OCWI to 127 FTE positions, which the Department indicated was done in order to investigate criminal conduct allegations in additional counties across the State. The Department reported that it is hiring new OCWI staff and had filled 65 FTE positions as of February 2015, but that it has yet to establish OCWI investigative units outside of Maricopa and Pima Counties. In addition, the OCWI reported that due to a state-wide hiring freeze, it is not able to hire staff to fill certain positions, but can continue to hire to fill investigator positions.

Chapter 1

Although the number of child abuse or neglect reports the Arizona Department of Child Safety (Department) received has been similar to or exceeded the national average, Arizona's substantiation rate for these reports has been below the national average. Specifically, the number of child abuse or neglect reports in Arizona has increased in recent years, ranging from about 33,000 to 44,000 annual reports between federal fiscal years 2008 and 2013, which was similar to or exceeded the national average. However, when accounting for each state's child population, Arizona's report rate was slightly below the national average, except for federal fiscal year 2013. Arizona substantiates cases of abuse or neglect at a lower rate than the national average, but the State's substantiation rate has nearly tripled between federal fiscal years 2008 and 2013. Substantiation rates among states may vary for several reasons, including the definitions of abuse and neglect. Additionally, legislative changes made in 2009, including expanded definitions of what constitutes abuse and neglect, likely contributed to the growth in the substantiation rate in Arizona.

Arizona's number of child abuse or neglect reports has been similar to or exceeded the national average, while its substantiation rate was below the national average

Arizona's increasing number of child abuse or neglect reports was similar to or exceeded the national average

Although Arizona's annual number of reports of child abuse or neglect was similar to the national average in federal fiscal years 2008 through 2010, the number of reports exceeded the national average in federal fiscal years 2011 through 2013. Specifically, according to department reports, the Department received approximately 33,000 to 44,000 reports of suspected child abuse or neglect annually between federal fiscal years 2008 and 2013.^{1,2} According to U.S. Department of Health and Human Services' reports, the national average for this same time period ranged from approximately 35,000 to 40,000 reports annually (see Figure 1, page 6).

The picture changes when the average is adjusted to address population differences between states. As shown in Figure 2, page 6, when state child population is included in the measure of annual reports received, Arizona received fewer annual reports than the national average between federal fiscal years 2008 and 2012, per 1,000 children. However, in federal fiscal year 2013, Arizona's number of reports per 1,000 children slightly exceeded the national average.

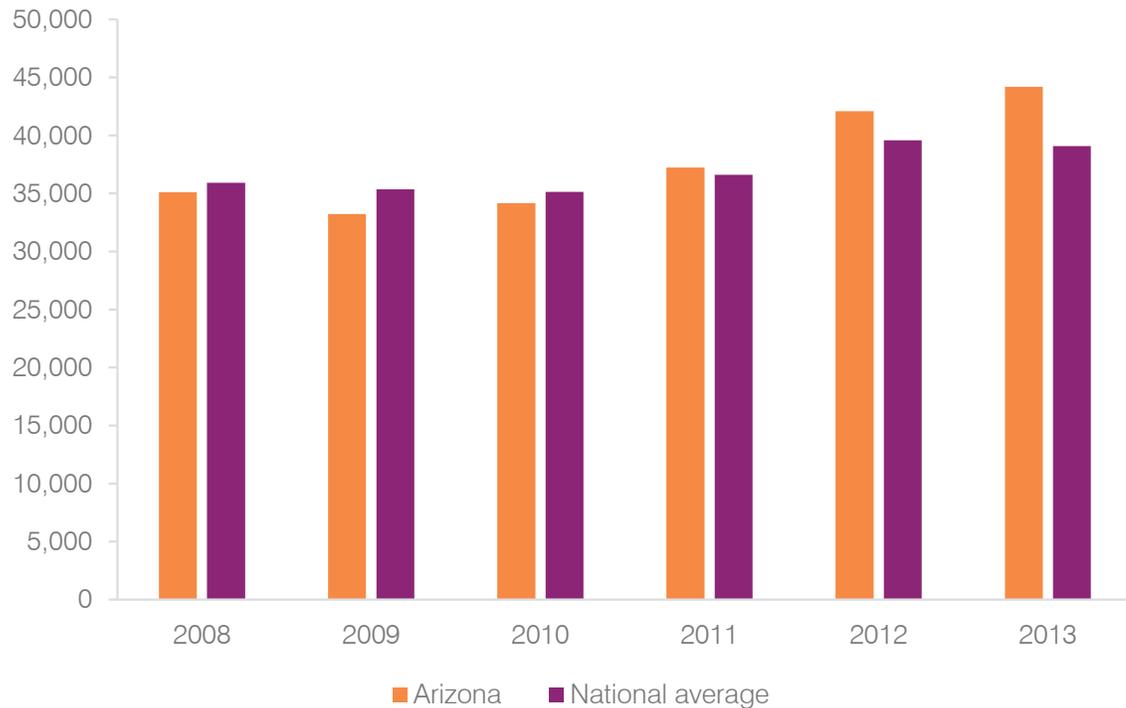
Against either measure—actual number of reported cases, or reports per 1,000 children—the number of reports the Department received has increased steadily since federal fiscal year 2009. According to the Department, one reason for the increase in reports may be due to legislative changes in 2009 that expanded the definitions of abuse and neglect (see page 10 for more detail on these legislative changes). As a result, a larger range of behaviors and/or situations met the definitions of abuse and neglect, which may have led to an increase in the number of reports.

Laws 2014, Ch.11, §24, requires the Auditor General to report on the average number of reports of child abuse or neglect for other states over the past 5 years compared to Arizona's number of reports of child abuse or neglect over the same time period.

¹ As of February 2015, national data was only available through federal fiscal year 2013; therefore, the time frame analyzed in this report represents the most recent period for which nationally comparative data was available. However, more recent data is available for Arizona. The Department reported receiving 48,032 reports in federal fiscal year 2014.

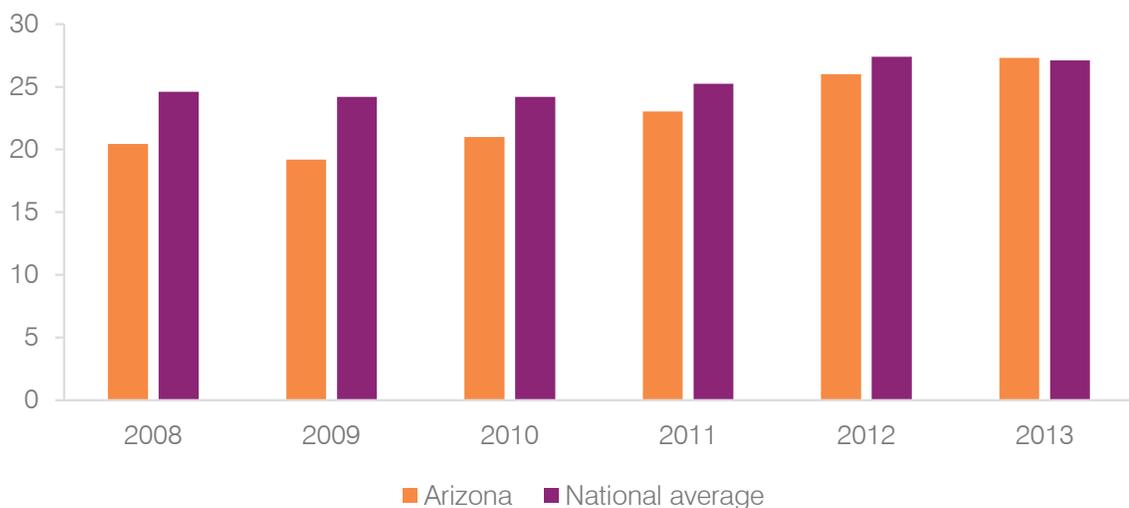
² Auditors extended the reporting time frame to 6 years in order to provide additional comparative information.

**Figure 1: Annual number of Arizona child abuse or neglect reports compared to the national average
Federal fiscal years 2008 through 2013**



Source: Auditor General staff analysis of information from the Department's semi-annual child welfare reports for the periods ended March 31, 2008 through September 30, 2013, and the U.S. Department of Health and Human Services' *Child Maltreatment* reports for federal fiscal years 2008 through 2013.

**Figure 2: Annual number of Arizona child abuse or neglect reports per 1,000 children compared to the national average
Federal fiscal years 2008 through 2013**



Source: Auditor General staff analysis of information from the Department's semi-annual child welfare reports for the periods ended March 31, 2008 through September 30, 2013, and the U.S. Department of Health and Human Services' *Child Maltreatment* data, adjusted for annual state child populations using U.S. Census Bureau data.

In addition to the legislative changes, changes to the Department’s Child Abuse Hotline screening tool may have led to an increase in reports. Specifically, according to department hotline management, the screening tool was changed in July 2010 to reflect a broader understanding of child abuse and neglect. For example, referrals that contained allegations of domestic violence were more likely to be screened-in for investigation after the adoption of the new tool, which incorporates the understanding that domestic violence can lead to child abuse if a child is repeatedly exposed and traumatized by that behavior. The previous tool would not have screened-in domestic violence referrals unless there was physical evidence that the child was injured as a result of the domestic violence.

Arizona’s rate of substantiation was below the national average, but has been increasing

Laws 2014, Ch.11, §24, requires the Auditor General to report on the rate of substantiated cases of child abuse or neglect for other states compared to Arizona’s rate of substantiated cases of child abuse or neglect, based on the ratio of the total number of children in each state to the substantiated cases of child abuse or neglect.

Arizona has substantiated cases of child abuse or neglect at a lower rate than the national average, but the State’s rate has been increasing. According to data from the National Child Abuse and Neglect Data System (NCANDS), Arizona’s rate of substantiation grew from 3.2 to 9.2 substantiated cases of child abuse or neglect per 1,000 children in the State between federal fiscal years 2008 and 2013 (see Figure 3, page 8).^{1,2} Most of this growth occurred between federal fiscal years 2009 and 2011, during which time Arizona’s substantiation rate nearly doubled from 3.6 to 7.1 per 1,000 children in the State. Despite this growth and as shown in Figure 3, Arizona’s substantiation rate remained below the national average for federal fiscal years 2008 through 2013. Specifically, the national average ranged from 10.9 to 11.6 substantiated cases of child abuse or neglect per 1,000 children during this time.

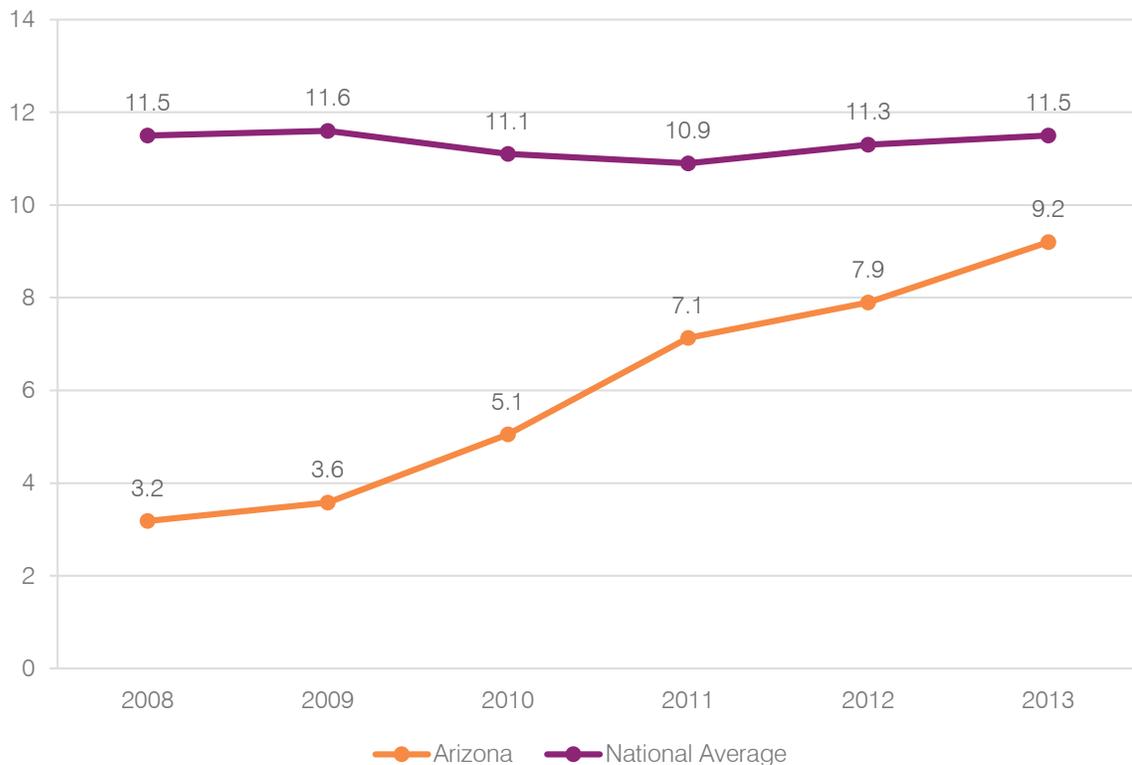
Substantiation rates can be measured in different ways. Appendix A (see pages a-1 through a-2), describes some alternative methods for measuring substantiation and shows Arizona’s rate compared to the national average using these alternative measurement methods. Across all of these methods, however, the result is the same—Arizona’s substantiation rate has been lower than the national average.

Although this information is helpful to illustrate trends over time, there are limitations in the conclusions that can be drawn by comparing substantiation rates. Specifically, an expert that auditors contacted cautioned against using substantiation rates as a measure to assess states’ performance as it relates to child welfare. In addition, literature indicates that substantiation status may not be effective

¹ A case refers to a report of abuse or neglect and a single child who was the subject of the report. Using this measure, an individual child may be counted more than once if the child was the subject of more than one substantiated report of abuse or neglect. Similarly, a report may also be counted more than once if more than one child was associated with the substantiated report.

² NCANDS is a federally sponsored, national data collection effort created for the purpose of tracking the volume and nature of child abuse and neglect reporting. As of February 2015, NCANDS data was only available through federal fiscal year 2013; therefore, the time frame analyzed in this report represents the most recent period for which nationally comparative data was available. The NCANDS data used in this report was provided by the National Data Archive on Child Abuse and Neglect (NDACAN) at Cornell University, and has been used with permission. The data was originally collected under the auspices of the Children’s Bureau. Funding was provided by the Children’s Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. The collector of the original data, the funder, NDACAN, Cornell University, and the agents or employees of these institutions bear no responsibility for the analyses or interpretations presented here. The information and opinions expressed reflect solely the opinions of the authors.

Figure 3: Number of substantiated Arizona cases of child abuse or neglect per 1,000 children compared to the national average^{1,2} Federal fiscal years 2008 through 2013



¹ A case of abuse or neglect refers to a report of abuse or neglect and a single child who was the subject of the report. Using this measure, an individual child may be counted more than once if the child was the subject of more than one substantiated report of abuse or neglect. Similarly, a report also may be counted more than once if more than one child was associated with the substantiated report.

² Not all states reported substantiation data to NCANDS for each federal fiscal year.

Source: Auditor General staff analysis of NCANDS data for federal fiscal years 2008 through 2013, adjusted for annual state child populations using U.S. Census Bureau data.

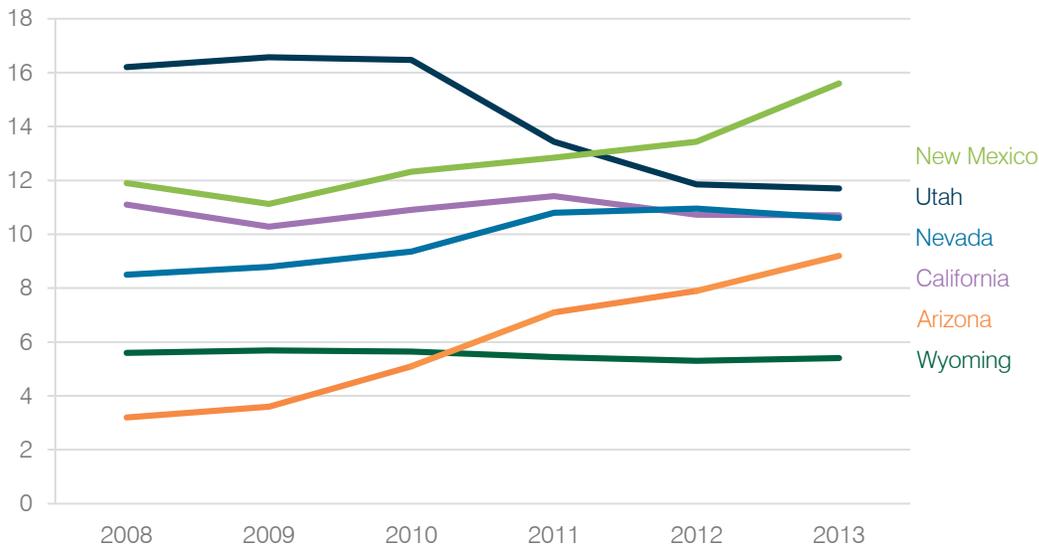
in measuring the presence or prevalence of actual child abuse or neglect, as children associated with unsubstantiated reports may also be victims of abuse or neglect and have similar developmental outcomes as children associated with substantiated reports of abuse and neglect.¹

Substantiation rates vary among states and several factors may contribute to this variation

Although the national average substantiation rate has been fairly stable, substantiation rates among individual states show marked variation. As shown in Figure 4, page 9, substantiation

¹ Hussey, J.M., Marshal, J.M., English, D.J., Knight, E.D., Lau, A.S., Dubowitz, H., & Kotch, J.B. (2005). Defining maltreatment according to substantiation: Distinction without a difference? *Child Abuse & Neglect*, 29, 479-492; and Kohl, P.L., Jonson-Reid, M., & Drake, B. (2009). Time to leave substantiation behind: Findings from a national probability study. *Child Maltreatment*, 14(1), 17-26.

**Figure 4: Arizona's substantiation rate per 1,000 children compared to various western states¹
Federal fiscal years 2008 through 2013**



¹ The substantiation rate represents the number of substantiated cases of child maltreatment per 1,000 children. A case of abuse or neglect refers to a report of abuse or neglect and a single child who was the subject of the report. Using this measure, an individual child may be counted more than once if the child was the subject of more than one substantiated report of abuse or neglect. Similarly, a report also may be counted more than once if more than one child was associated with the substantiated report.

Source: Auditor General staff analysis of NCANDS data for federal fiscal years 2008 through 2013, adjusted for annual state child populations using U.S. Census Bureau data.

rates for various western states ranged from approximately 3 to 16 substantiated cases of child abuse or neglect per 1,000 children between federal fiscal years 2008 and 2013. Further, although Arizona's rate has increased, some states have experienced decreases in their substantiation rate. For example, Utah's substantiation rate decreased from approximately 16 to 12 substantiated cases of abuse or neglect per 1,000 children over that same time period.

The decision to substantiate an allegation of child abuse or neglect can be influenced by several factors. Although research on substantiation practices is not entirely definitive, literature indicates that there are several interacting factors that can influence the decision to substantiate a case of abuse or neglect, such as the reporting source, the type of allegation, and the caseworker's perception of risk.¹ In addition, an expert that auditors contacted identified that state definitions of abuse and neglect may contribute to state-to-state variation in substantiation rates. States are guided by federal definitions of abuse and neglect, but state definitions may vary. Although state definitions consistently include physical abuse, sexual abuse, neglect, and emotional abuse, some states also include other

¹ Dettlaff, A.J., Rivaux, S.L., Baumann, D.J., Fluke, J.D., Rycraft, J.R., & James, J. (2011). Disentangling substantiation: The influence of race, income, and risk on the substantiation decision in child welfare. *Children and Youth Services Review*, 33, 1630-1637; Petersen, A., Joseph, J., & Feit, M. (Eds.) (2013). *New directions in child abuse and neglect research: Child abuse and neglect policy* (pp. 349-380). Washington, DC: National Academy of Sciences.; Tonmyr, L., Ouimet, C., & Ugnat, A. (2012). A review of findings from the Canadian Incidence Study of Reported Child Abuse and Neglect (CIS). *Canadian Journal of Public Health*, 103(2), 103-112.; and Zuravin, S.J., Orme, J.G., & Hegar, R.L. (1995). Disposition of child physical abuse reports: Review of the literature and test of a predictive model. *Children and Youth Services Review*, 17(4), 547-566.

specific types of abuse and/or include situations in which the child is threatened or at risk of harm.¹ For example, Arizona and several other states include exposure of infants to drugs in their definitions of abuse or neglect.

Another possible explanatory factor in substantiation rate variation among states is the burden of proof or level of evidence required to substantiate a report of abuse or neglect, but research on this factor is inconclusive. Some states employ a more rigorous standard for evidence than others, and having a lower standard would appear to be a reasonable explanation for higher substantiation rates, and vice versa.² The Department makes substantiation decisions using a “probable cause” burden of proof (see Introduction, page 2), which is a relatively low burden of proof compared to those employed by other states. However, Arizona’s lower-than-average substantiation rate suggests that additional factors beyond the burden of proof are influencing the State’s substantiation rate.

Legislative changes likely contributed to the increase in Arizona’s substantiation rate

Although the exact reasons for the differences between Arizona’s and other states’ rates may be difficult to discern, legislative changes may have contributed to the recent increase in Arizona’s substantiation rate. In 2009, Arizona passed legislation that affected the substantiation of reports of abuse or neglect in two ways.³ First, the legislation expanded the definitions of abuse and neglect. For example, the definition of neglect was expanded to include prenatal exposure to certain drugs and substances. Second, the legislation changed substantiation policy around dependency adjudications.⁴ Specifically, the legislative change required that when a child became a legal dependent of the Department, the report of abuse or neglect associated with the approved petition for dependency was automatically substantiated. Because of the nature and timing of these changes, they are likely explanatory factors for Arizona’s increased substantiation rate.

¹ Petersen, Joseph, & Feit, 2013

² Provencher, A., Gupta-Kagan, J., & Hansen, M.E. (2014). The standard of proof at adjudication of abuse or neglect: Its influence on case outcomes at key junctures. *Social Work & Social Sciences Review*, 17(2), 22-56.

³ Laws 2009, Ch. 126, §§1 and 3

⁴ A dependency adjudication refers to the court’s processes for considering department requests to award custody of a child to the State.

Chapter 2

Arizona appears to use a somewhat unique approach for investigating allegations of criminal child abuse and neglect by having a special investigative unit—the Office of Child Welfare Investigations (OCWI)—to work with child safety caseworkers to investigate these types of allegations. Auditors contacted every state, and, of the 25 states that responded, only Texas reported having a child safety organization similar to Arizona’s OCWI. Redundancy among child safety caseworkers, child safety law enforcement, and local law enforcement was not cited as an issue in Texas; however, Texas staff reported taking steps to address some initial collaboration issues. The Arizona Department of Child Safety (Department) staff reported some issues that may have led to redundancy in work between OCWI investigators and department caseworkers when the OCWI was initially formed, but that these redundancies have largely been resolved. The Department should continue to take actions to foster collaboration as OCWI expands throughout the State.

Arizona’s investigative approach for criminal child abuse and neglect allegations largely unique among states surveyed

Texas is only responding state with an office similar to OCWI

Based on the information states provided to auditors, only Texas has a child safety organization similar to Arizona’s OCWI. Specifically, auditors contacted child welfare investigative agencies in every state to determine how many states have a special investigative unit that works with child safety caseworkers and law enforcement to investigate allegations of criminal child abuse or neglect. Based on the information provided by the investigative agencies from 25 states that responded, only the Texas Department of Family and Protective Services (Texas Department) has an investigative model similar to Arizona’s (see the next two paragraphs for additional information about Texas’ model). Most other agencies provided information indicating that child abuse investigations involve two parties—child safety caseworkers and law enforcement—but not a third-party investigative unit.

In 2005, the Texas Legislature established Special Investigator (SI) positions within the Texas Department. The SIs assist Texas department caseworkers in child abuse or neglect cases that are high-profile or high-risk in nature or require joint investigation with law enforcement because of alleged criminal acts. SIs are similar to OCWI investigators in the following several ways:

- SIs are Texas department employees and assist Texas department caseworkers in investigations for specific types of cases.
- SIs focus on the forensic components of an investigation, as well as coordinating with law enforcement.
- The Texas Department hires candidates with law enforcement backgrounds for the SI position, but Texas department staff reported that SIs do not carry weapons or have arrest powers while on-duty as an SI.

Laws 2014, Ch.11, §24, requires the Auditor General to report on the number of states with a child safety organization similar to the Office of Child Welfare Investigations, including a description of how other states with state-level child safety law enforcement organizations avoid redundancies among child safety caseworkers, child safety law enforcement, and local law enforcement when investigating allegations of criminal abuse.

Although SIs are similar to OCWI investigators, there are some important differences between them. Notably, an SI's involvement in an investigation is not mandated by Texas law, and Texas department staff reported that SIs will become involved in an investigation of severe abuse or neglect only at the request of Texas caseworkers. In contrast, Arizona law mandates that an OCWI investigator be involved when the allegation involves criminal conduct. Additionally, Texas department staff indicated that caseworkers, not SIs, are ultimately responsible for making child safety decisions, such as whether to remove a child from his/her home. In Arizona, OCWI investigators are responsible for making the final child safety decisions in cases they investigate (see Introduction, page 2).

Texas reported no redundancy concerns with investigations, but took steps to improve collaboration

Texas department staff reported no redundancy issues in its investigations, but the Texas department took several steps to improve collaboration between SIs and caseworkers. Auditors interviewed seven Texas department staff, including caseworkers and SI staff, to assess how Texas avoided redundancies among child safety caseworkers, SIs, and local law enforcement. Although investigations can involve both SI and caseworker staff, staff reported no negative redundancies in the investigative work. In fact, they indicated that having two persons jointly investigate cases generally helps ensure appropriate decision making. However, Texas department staff indicated that there were some initial collaboration issues between SIs and caseworkers due to caseworkers' lack of understanding regarding SIs or why the SI position was created. These issues resulted in caseworkers not always involving SIs in investigations. According to Texas department staff, the Texas Department took several actions to address these collaboration issues. Specifically:

- **Co-location**—The Texas Department housed SIs and caseworkers together in the same physical work space, also known as co-location. Texas department staff reported that co-location was important in fostering collaboration because face-to-face contact allowed for both parties to better communicate and get to know each other. In turn, this led to staff developing good personal relationships and better collaboration. Literature on child abuse investigations cites co-location as a facilitator to collaboration between multiple entities.¹ Specifically, the physical closeness that co-location creates may help individuals understand that each entity is working toward a common goal.² Further, co-location can help ease the logistical challenge of staff jointly responding to a case.³

¹ Garcia, A., Puckett, A., Ezell, M., Pecora, P.J., Tanoury, T., & Rodriguez, W. (2014). Three models of collaborative child protection: What is their influence on short stays in foster care? *Child & Family Social Work*, 19, 125-135; New South Wales Human Services, Community Services. (2010, March). *Interagency collaboration: Making it work* [Research to Practice Note]. Retrieved October 30, 2014, from www.community.nsw.gov.au; Newman, B.S. & Dannenfelser, P.L. (2005). Children's protective services and law enforcement: Fostering partnerships in investigations of child abuse. *Journal of Child Sexual Abuse*, 14(2), 97-111; and Winterfeld, A.P. & Sakagawa, T. (2003). *Investigation models for child abuse and neglect: Collaboration with law enforcement*. Englewood, CO: American Humane, Children's Services.

² Newman & Dannenfelser, 2005

³ Newman & Dannenfelser, 2005

- **Outreach**—SI staff also reported that they conducted brief outreach presentations with caseworkers, and that these presentations played a critical role in fostering collaboration. The outreach presentations explained the SI role and how SIs could help in an investigation. SI staff stated that once caseworkers understood how the SIs could help in an investigation, they became more open to collaborating with SIs on investigations.
- **Joint-training**—SIs and caseworkers go through Texas department basic training together and, in the training, learn about each other's role. In addition, SI staff reported that SIs offer trainings to caseworkers and law enforcement on a variety of topics, such as forensic interviewing techniques. SI staff indicated that these training practices were important in fostering collaboration between caseworkers, SIs, and local law enforcement. This concept is also supported by literature, which indicates that training staff from different disciplines on each other's roles is important for collaboration.¹ Specifically, such training helps staff to understand other disciplines' roles and procedures in order to interact effectively with them.²
- **Role definition**—Finally, some department regions in Texas developed guidance that clearly defined the SI responsibilities during an investigation. SI staff reported that this type of guidance is helpful to ensure better understanding among SIs and caseworkers regarding their individual roles. SI staff reported that better role-understanding ultimately fostered better collaboration. Literature indicates that having clear guidance on roles may help foster collaboration in child welfare investigations because it defines individual responsibilities.³

Arizona's Department should continue to take various actions to foster collaboration as OCWI expands

Although some initial concerns regarding redundancies between department caseworkers and OCWI investigators have largely been resolved, the Department should continue with its efforts to improve collaboration between these two groups. Specifically, various department staff reported that negative redundancies existed when OCWI was first created, but that most of these initial concerns have been addressed. However, there is opportunity for improved collaboration between department caseworkers, OCWI investigators, and law enforcement that would further address any lingering concerns regarding negative redundancies or ineffective collaboration. As a result, the Department should continue its co-location of department staff, including department caseworkers and OCWI investigators, update protocols for working with local law enforcement, and enhance its investigative training curriculum.

Initial redundancy concerns have largely been addressed—Although various department staff acknowledged some redundancy concerns when OCWI was initially created, for the most part, these concerns have been resolved. Auditors interviewed various department staff and Arizona law enforcement personnel and observed two OCWI investigations in order to assess

¹ New South Wales Human Services, 2010; Newman & Dannenfelser, 2005; and Winterfeld & Sakagawa, 2003

² Newman & Dannenfelser, 2005; and Winterfeld & Sakagawa, 2003

³ Garcia et al., 2014; New South Wales Human Services, 2010; and Winterfeld & Sakagawa 2003

redundancy and collaboration in OCWI investigations.¹ Department staff reported that some negative redundancies existed when the OCWI was first created, including OCWI investigators and department caseworkers re-interviewing individuals, and department caseworkers not actively engaging in some aspects of an investigation. Department staff indicated that these redundancies resulted from poor collaboration between OCWI investigators and department caseworkers, which staff attributed to a poor understanding by department caseworkers of the OCWI's purpose and role. However, department staff reported that these initial issues have largely been resolved over time. Additionally, the Department has taken some actions that may also have helped to address these issues, such as instituting co-location of OCWI staff and department caseworkers, and creating policies and procedures defining OCWI's involvement in investigations.

In addition, auditors did not observe any negative redundancies in their two observations of OCWI investigations. Auditors observed that both the OCWI investigator and department caseworker worked together on investigative tasks, including interviewing alleged perpetrators and family members, and visiting the alleged perpetrators' home. Department staff indicated that having two persons jointly investigate cases helps to ensure appropriate decision making by having additional input in the investigative process, which is similar to what Texas department staff reported.

Department should continue to improve collaboration to address any lingering concerns—Although department staff reported that initial issues between OCWI investigators and department caseworkers have largely been resolved, staff also indicated that some lingering issues may impede effective collaboration between the two groups. For example, some department staff reported that there were feelings of animosity toward the OCWI because they believed OCWI investigators are paid more and have lower caseloads. Staff reported that lingering issues could potentially lead to inadequate communication between department caseworkers and OCWI investigators during investigations and ultimately result in redundancies, such as re-interviewing persons. Both OCWI investigators and local law enforcement also reported some occasional communication issues with each other. As the OCWI expands its work throughout the State (see the Introduction, page 3, for additional information about the OCWI's expansion), the Department should continue taking steps to improve collaboration between OCWI investigators, department caseworkers, and local law enforcement. Specifically, the Department should do the following:

- **Continue co-location of department staff**—The Department should continue its efforts to co-locate department staff as the OCWI expands. As of February 2015, the Department reported that it had three co-locate units that can house a mix of department caseworkers, OCWI investigators, law enforcement, and other professionals. The caseworkers in these units are primarily assigned to work jointly with the OCWI on criminal abuse or neglect investigations. Similar to Texas department staff, OCWI and other department staff identified co-location as critical to fostering collaboration in investigations.
- **Update protocols for working with local law enforcement and other parties**—The Department should also take steps to help ensure that investigative protocols for

¹ Auditors interviewed department officials, OCWI staff, and department caseworkers, as well as law enforcement personnel in the Phoenix and Tucson police departments.

coordinating the involvement of various external entities, such as local law enforcement and county attorneys, are up-to-date and reflect the OCWI's role. Specifically, the Department should work with the Maricopa and Pima County Attorneys to update the multidisciplinary protocols (see textbox) to include information on the OCWI's role. As of February 2015, neither county's multidisciplinary protocols included guidance and instruction on the OCWI's involvement in investigations. Further, as the OCWI expands, the Department should take steps to ensure that other counties where the OCWI conducts investigations have up-to-date multidisciplinary protocols. Although OCWI staff reported generally positive collaboration with law enforcement, OCWI staff also indicated that law enforcement may not always openly communicate during the investigative process. Breakdowns in communication may be aggravated by the out-of-date protocols. Having clearly defined protocols regarding what information can and should be shared between OCWI staff and local law enforcement would help foster better coordination in the future.

County multidisciplinary protocols—County-level policies and procedures for coordinating the involvement of and interaction between various disciplines involved in child abuse and neglect investigations, including the Department, law enforcement, medical and behavioral health personnel, county attorneys, the courts, and schools.

Source: Auditor General staff summary of Pima and Maricopa Counties' multidisciplinary protocols.

- **Conduct additional training**—The Department should ensure that all department staff understand the OCWI's role through outreach and training. Although the Department's caseworker training materials provide a brief description of the OCWI, department staff reported that little outreach and training has been conducted to explain the OCWI's role to caseworkers, suggesting additional training is needed. In fact, some department caseworkers reported they were not aware of the Department's written policies related to the OCWI's role during investigations. This lack of understanding regarding roles and responsibilities can contribute to confusion and inconsistency in conducting investigations. For example, some OCWI investigators and department caseworkers reported variation in the tasks that OCWI investigators will carry out during investigations. Specifically, department staff indicated that department caseworkers should complete a broad assessment of an alleged victim's safety and home environment as part of the investigation. However, department staff indicated that if a caseworker is not present during an investigation, some OCWI investigators will complete the assessment, while others will not.

The Department indicated that it has started to take some steps to address the training issues noted by staff. Specifically, the Department reported that it will pilot a mandatory advanced joint investigations class by March 2015 for all OCWI investigators and department investigative caseworkers. This class will be taught by the OCWI and will focus on the Department's responsibility in investigating a criminal conduct case with law enforcement. However, the Department reported that this class will not address the delineation of roles between the OCWI and department caseworkers in an investigation. Therefore, in addition to ensuring that all OCWI investigators and department caseworkers attend the new joint investigations class, the Department should incorporate instruction on the specific roles of OCWI investigators and department caseworkers into its investigative training curriculum. This training should also include instruction on the policies, procedures, and protocols governing criminal conduct investigations.

Recommendations:

1. The Department should continue its efforts to co-locate OCWI staff, department caseworkers, and other investigative staff as the OCWI expands.
2. The Department should work with the Maricopa and Pima County Attorneys to update the multidisciplinary protocols to include information on the OCWI's role in child abuse and neglect investigations, including a description of information to be shared between local law enforcement and the OCWI. Further, as the OCWI expands, the Department should take steps to ensure that other counties where the OCWI conducts investigations have up-to-date multidisciplinary protocols.
3. The Department should enhance its training related to criminal conduct investigations by:
 - a. Ensuring all OCWI investigators and department caseworkers attend the advanced joint investigations class; and
 - b. Adding instruction on the specific roles of OCWI investigators and department caseworkers during a criminal conduct investigation into its investigative training curriculum, including instruction specific to the policies, procedures, and protocols governing these investigations.

APPENDIX A

This appendix describes other methods used to measure substantiation—including the child victimization rate and percentage of total reports substantiated—and shows how Arizona compares to the national average for these measures.

Alternative measures of substantiation

Child victimization rate

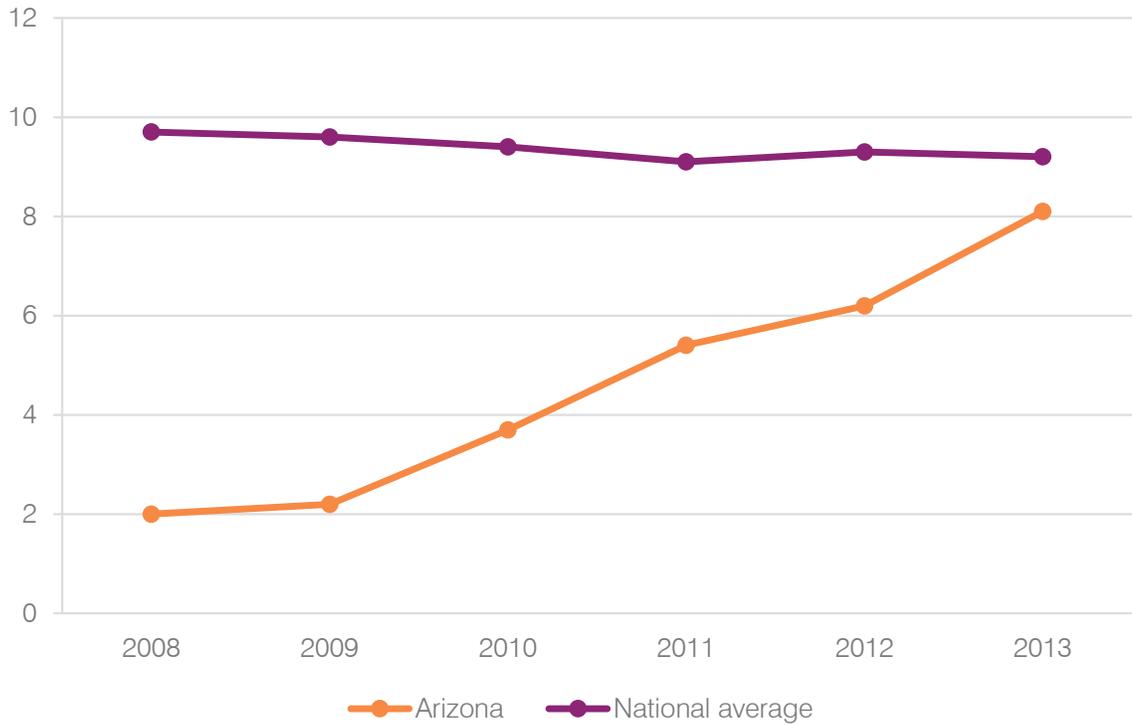
The child victimization rate measures the total number of children who were the subject of one or more substantiated reports of abuse or neglect. Using this measure, children are counted only once even though they may have been the subject of more than one substantiated report. In contrast, the measure used in Chapter 1 (see page 8) counts each child for each substantiated report. Figure 5, page a-2, compares Arizona's child victimization rate to the national average rate adjusted for population. As shown in Figure 5, Arizona's child victimization rate was below the national average rate, but has been increasing.

Percentage of total reports substantiated

This measure divides the total number of substantiated reports by the total number of reports referred for investigation. Individual children may not be counted if more than one child victim is associated with a substantiated report, as is often the case when allegations involve siblings. The Arizona Department of Child Safety uses this measure to report on its substantiation rate for its semi-annual child welfare reporting requirements. Figure 6, page a-2, compares Arizona's substantiation rate using this measure to the national average calculated using data from the National Child Abuse and Neglect Data System (NCANDS).¹ As with other measures, the percentage of reports substantiated in Arizona was lower than the national average.

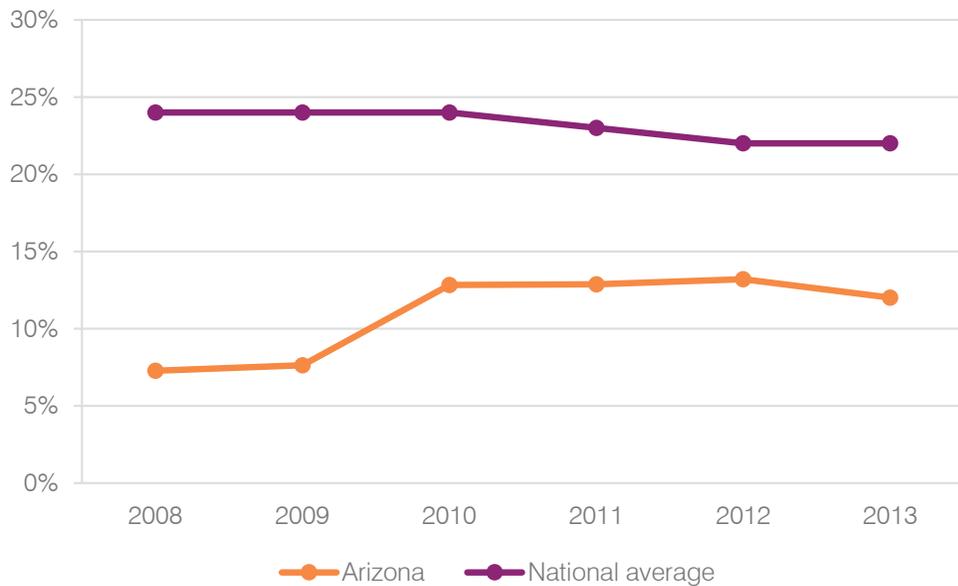
¹ NCANDS is a federally sponsored, national data collection effort created for the purpose of tracking the volume and nature of child abuse and neglect reporting. As of February 2015, NCANDS data was only available through federal fiscal year 2013; therefore, the time frame analyzed in this report represents the most recent period for which nationally comparative data was available. The NCANDS data used in this report was provided by the National Data Archive on Child Abuse and Neglect (NDACAN) at Cornell University, and has been used with permission. The data was originally collected under the auspices of the Children's Bureau. Funding was provided by the Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. The collector of the original data, the funder, NDACAN, Cornell University, and the agents or employees of these institutions bear no responsibility for the analyses or interpretations presented here. The information and opinions expressed reflect solely the opinions of the authors.

**Figure 5: Number of Arizona child victims of abuse or neglect per 1,000 children compared to the national average
Federal fiscal years 2008 through 2013**



Source: Auditor General staff analysis of information from the U.S. Department of Health and Human Services' *Child Maltreatment 2012* and *Child Maltreatment 2013* reports.

**Figure 6: Percentage of Arizona reports that were substantiated compared to the national average
Federal fiscal years 2008 through 2013**



Source: Auditor General staff analysis of modified NCANDS data provided by NDACAN staff for federal fiscal years 2008 through 2013 and information from the Department's semi-annual child welfare reports for the periods ended September 30, 2010 and March 31, 2014.

APPENDIX B

Methodology

This appendix provides information on the methods auditors used to meet the report objectives. The Auditor General and staff express appreciation to the Arizona Department of Child Safety (Department) Director, and staff for their cooperation and assistance throughout the engagement.

Auditors used various methods to study the issues addressed in this report. These methods included interviewing department officials and staff and reviewing applicable state laws, applicable department policies and procedures, other information obtained from the Department, and prior Office of the Auditor General reports. In addition, auditors used the following specific methods to meet the audit objectives:

- To compare the number of Arizona child abuse or neglect reports to the national average, and adjust this comparison for differences in states' child populations, auditors analyzed information from the following sources:¹
 - The U.S. Department of Health and Human Services' *Child Maltreatment* reports for federal fiscal years 2008 through 2013, which contain the annual number of child abuse and neglect reports reported nationally;
 - U.S. Census Bureau data on annual state child populations for the corresponding time frames; and
 - The Department's semi-annual child welfare reports for the periods ended March 31, 2008 through September 30, 2014, regarding the annual number of Arizona child abuse or neglect reports reported in Arizona for federal fiscal years 2008 through 2014.²
- To compare Arizona's rate of substantiated cases of child abuse or neglect per 1,000 children to the national average, auditors analyzed National Child Abuse and Neglect Data System (NCANDS) data for federal fiscal years 2008 through 2013 and U.S. Census Bureau data on

¹ As of February 2015, federal fiscal year 2013 was the most recent year that national data was available; therefore, auditors compared Arizona to the national average for federal fiscal years 2008 through 2013. However, the report also provides the number of Arizona child abuse and neglect reports for federal fiscal year 2014.

² Information in the semi-annual reports is compiled from department data systems. Based on a review of the Department's processes for compiling this information, auditors determined that the information auditors analyzed was sufficiently reliable for the purposes of this report.

annual state child populations for the corresponding time frames.^{1,2} Auditors also reviewed literature and interviewed an expert from the University of South Carolina regarding factors affecting state substantiation rates.³

- To identify the number of states with a child safety organization similar to the Arizona Office of Child Welfare Investigations (OCWI), auditors contacted child welfare investigative agencies in every state and received information from investigative agencies in 25 states. Based on this information, auditors determined that only 1 of these 25 states, Texas, had a child safety organization similar to the OCWI. To understand how Texas avoided redundancies among parties involved in criminal abuse investigations, auditors interviewed Texas Department of Family and Protective Services staff and reviewed documentation provided by these staff. Additionally, to assess redundancy and collaboration in OCWI investigations, auditors interviewed various department staff and Arizona law enforcement personnel and conducted observations of two OCWI investigations.⁴ Finally, auditors also reviewed literature on interagency collaboration in child abuse and neglect investigations, and reviewed the multidisciplinary protocols for Maricopa and Pima Counties.^{5,6}
- To compare Arizona to the national average using other report substantiation measures included in Appendix A, auditors:
 - Analyzed information from the U.S. Department of Health and Human Services' *Child Maltreatment 2012 and Child Maltreatment 2013* reports to compare the number of Arizona child victims of abuse or neglect per 1,000 children to the national average; and

¹ NCANDS is a federally sponsored, national data collection effort created for the purpose of tracking the volume and nature of child abuse and neglect reporting. As of February 2015, NCANDS data was only available through federal fiscal year 2013; therefore, the time frame analyzed in this report represents the most recent period for which nationally comparative data was available. The NCANDS data used in this report was provided by the National Data Archive on Child Abuse and Neglect (NDACAN) at Cornell University, and has been used with permission. The data was originally collected under the auspices of the Children's Bureau. Funding was provided by the Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. The collector of the original data, the funder, NDACAN, Cornell University, and the agents or employees of these institutions bear no responsibility for the analyses or interpretations presented here. The information and opinions expressed reflect solely the opinions of the authors.

² Auditors determined that the NCANDS data was sufficiently reliable for the purpose of this audit as it is used widely by child welfare researchers and government entities.

³ Dettlaff, A.J., Rivaux, S.L., Baumann, D.J., Fluke, J.D., Rycraft, J.R., & James, J. (2011). Disentangling substantiation: The influence of race, income, and risk on the substantiation decision in child welfare. *Children and Youth Services Review*, 33, 1630-1637; Petersen, A., Joseph, J., & Feit, M. (Eds.) (2013). *New directions in child abuse and neglect research: Child abuse and neglect policy* (pp. 349-380). Washington, DC: National Academy of Sciences; Provencher, A., Gupta-Kagan, J., & Hansen, M.E. (2014). The standard of proof at adjudication of abuse or neglect: Its influence on case outcomes at key junctures. *Social Work & Social Sciences Review*, 17(2), 22-56. Tonmyr, L., Ouimet, C., & Ugnat, A. (2012). A review of findings from the Canadian Incidence Study of Reported Child Abuse and Neglect (CIS). *Canadian Journal of Public Health*, 103(2), 103-112; and Zuravin, S.J., Orme, J.G., & Hegar, R.L. (1995). Disposition of child physical abuse reports: Review of the literature and test of a predictive model. *Children and Youth Services Review*, 17(4), 547-566.

⁴ Auditors interviewed 14 department staff, including officials, caseworkers, and OCWI investigators, and 3 law enforcement personnel in the Phoenix and Tucson police departments.

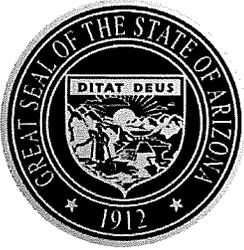
⁵ Garcia, A., Puckett, A., Ezell, M., Pecora, P.J., Tanoury, T., & Rodriguez, W. (2014). Three models of collaborative child protection: What is their influence on short stays in foster care? *Child & Family Social Work*, 19, 125-135; New South Wales Human Services, Community Services. (2010, March). *Interagency collaboration: Making it work* [Research to Practice Note]. Retrieved October 30, 2014, from www.community.nsw.gov.au; Newman, B.S. & Dannenfels, P.L. (2005). Children's protective services and law enforcement: Fostering partnerships in investigations of child abuse. *Journal of Child Sexual Abuse*, 14(2), 97-111; and Winterfeld, A.P. & Sakagawa, T. (2003). *Investigation models for child abuse and neglect: Collaboration with law enforcement*. Englewood, CO: American Humane, Children's Services.

⁶ Multidisciplinary protocols are county-level policies and procedures for coordinating the involvement of and interaction between various disciplines involved in child abuse investigations, including the Department, law enforcement, medical and behavioral health personnel, county attorneys, the courts, and schools.

- Analyzed modified NCANDS data provided by NDACAN staff for federal fiscal years 2008 through 2013 and information from the Department's semi-annual child welfare reports for the periods ended September 30, 2010 and March 31, 2014, to compare the percentage of Arizona reports that were substantiated to the national average.

AGENCY RESPONSE

AGENCY RESPONSE



Arizona Department of Child Safety

Douglas A. Ducey
Governor

Gregory McKay
Director

March 12, 2015

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

Re: Auditor General Report on Child Abuse or Neglect Reports, Substantiation Rate, and Office of Child Welfare Investigations Audit Response

Dear Ms. Davenport:

The Arizona Department of Child Safety (Department) appreciates the opportunity to provide this response to the Auditor's General's report on Child Abuse or Neglect Reports, Substantiation Rate, and Office of Child Welfare Investigations. The Department values the collaborative effort of the Auditor General's staff throughout this audit.

Enclosed is the Department's response to each individual recommendation. Thank you again for the opportunity to provide feedback, we agree to the recommendations and believe that the recommendations are constructive in helping the Department better serve the children of Arizona.

Sincerely,

Gregory McKay
Director

Enclosure

cc: Shalom Jacobs, Deputy Director of Operations

**ARIZONA DEPARTMENT OF CHILD SAFETY'S RESPONSE TO THE OFFICE OF
THE AUDITOR GENERAL'S REPORT ON
CHILD ABUSE OR NEGLECT REPORT, SUBSTANTIATION RATE and OFFICE
OF CHILD WELFARE INVESTIGATION**

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

RECOMMENDATION 1:

The Department should continue its efforts to co-locate OCWI staff, department caseworkers, and other investigative staff as the OCWI expands.

DCS Response:

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

RECOMMENDATION 2:

The Department should work with the Maricopa and Pima County attorneys to update the multidisciplinary protocols to include information on the OCWI's role in child abuse and neglect investigations, including a description of information to be shared between local law enforcement and the OCWI. Further, as OCWI expands the department should take steps to ensure that other counties where OCWI conducts investigations have up-to-date multidisciplinary protocols.

DCS Response:

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

RECOMMENDATION 3:

The Department should enhance its training related to criminal conduct investigations by:

- a. Ensuring all OCWI investigators and department case workers attend the advanced joint investigations class; and
- b. Adding instruction on the specific roles of OCWI investigators and department caseworkers during a criminal conduct investigation into its investigative training curriculum, including instruction specific to the policies, procedures, and protocols governing these investigations.

DCS Response:

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

Performance Audit Division reports issued within the last 24 months

13-01	Department of Environmental Quality—Compliance Management
13-02	Arizona Board of Appraisal
13-03	Arizona State Board of Physical Therapy
13-04	Registrar of Contractors
13-05	Arizona Department of Financial Institutions
13-06	Department of Environmental Quality—Underground Storage Tanks Financial Responsibility
13-07	Arizona State Board of Pharmacy
13-08	Water Infrastructure Finance Authority
13-09	Arizona State Board of Cosmetology
13-10	Department of Environmental Quality—Sunset Factors
13-11	Arizona State Board of Funeral Directors and Embalmers
13-12	Arizona State Board for Charter Schools
13-13	Arizona Historical Society
CPS-1301	Arizona Department of Economic Security—Children Support Services—Foster Home Recruitment-Related Services Contracts
13-14	Review of Selected State Practices for Information Technology Procurement
13-15	Arizona Game and Fish Commission, Department, and Director
14-101	Arizona Department of Economic Security—Children Support Services—Transportation Services
14-102	Gila County Transportation Excise Tax
14-103	Arizona State Board of Dental Examiners
14-104	Arizona Office of Administrative Hearings
14-105	Arizona Board of Executive Clemency
14-106	State of Arizona Naturopathic Physicians Medical Board
14-107	Arizona Department of Child Safety—Children Support Services—Emergency and Residential Placements
14-108	Arizona Department of Administration—Arizona State Purchasing Cooperative Program

Future Performance Audit Division reports

Arizona Department of Administration—State-wide Procurement
Arizona Department of Transportation—Motor Vehicle Division

