



March 29, 2016

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

Re: Auditor General Report on Differential Response (Report No. 16-102)

Dear Ms. Davenport:

The Arizona Department of Child Safety (DCS) appreciates the opportunity to provide this response to the Auditor General's draft report on Differential Response. The collaborative effort of the Auditor General's staff throughout this audit is valued and appreciated.

Enclosed is the Department's response to each recommendation. Thank you for the opportunity to respond to the recommendations. The ongoing efforts and the information in the Auditor general's report will assist in the development and implementation of a differential response system to serve the children of Arizona.

Sincerely,

Gregory McKay
Director

Enclosure

cc: Shalom Jacobs, Deputy Director of Operations, Department of Child Safety
Katherine Guffey, Chief Quality Improvement Officer, Department of Child Safety
Emilio Gonzales, Audit Manager, Department of Child Safety



ARIZONA DEPARTMENT OF CHILD SAFETY

RESPONSE TO THE OFFICE OF THE AUDITOR GENERAL'S REPORT ON DIFFERENTIAL RESPONSE (REPORT NO. 16-102)

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

RECOMMENDATION 1

Continue to address stakeholder concerns and work with the legislature to pursue any needed statutory changes that allow for differential response.

DCS Response:

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

Pursuant to Arizona Laws, 2014, Second Special Session, Chapter 1, Section 156, the Department presented comprehensive recommendations on the necessity of and requirements for family assessment protocols to the Arizona Legislature in June 2015.

The Department has worked with stakeholders throughout the process of designing a differential response system, to gather their input. Additionally, public meetings were held in Phoenix, Tucson, Flagstaff and Yuma in May 2015 to obtain public comments. A multidisciplinary implementation team of community stakeholders participated in the design of the Family Assessment Response. This team will continue to be involved throughout the implementation process.

The Department will continue to consider stakeholder concerns as the final decisions about the model design are developed. Also, the Department will continue to engage with the Legislature to identify and finalize the needed statutory changes to implement a differential response system.

RECOMMENDATION 2

Work with the Legislature to determine the extent to which the differential response system should be outlined in legislation.

DCS Response:

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

The Department agrees that working with the Legislature as a key stakeholder is critical to the success of the development of a differential response system. The Department will continue to work with the Legislature in the development of the necessary key components to build an

effective differential response system, including the extent to which key components should be outlined in legislation.

RECOMMENDATION 3

Finalize and implement its criteria and policies and procedures for making response assignment decisions, including policies and procedures regarding when the response assignment decision will be made and by whom. These policies and procedures should allow for response track switching, and the Department should develop and implement criteria or guidance, such as a review process, to help ensure that decisions to switch response tracks are appropriate and should ensure that its data systems can accommodate these changes.

DCS Response:

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

The Department is utilizing an Implementation Science approach for the development and implementation of a differential response system. This approach requires the development of policies and procedures as a key component of the implementation of the differential response system. The Department will ensure these policies and procedures address the eight core elements of a differential response system, which support consistent practice and appropriate decision making.

The Department, with input from stakeholders, has established criteria for when track switching will be appropriate. The criteria for track switching include: when a new report of child abuse or neglect is received that requires an investigation response; criminal conduct allegations are discovered during the family assessment response; or the family refuses to participate in the required child safety assessment through the Family Assessment Response system.

The Department agrees that its data system needs to capture all data elements necessary for the day-to-day management of the differential response program, as well as data for program evaluation purposes. Exploration of how and when this information can best be incorporated into its new statewide child welfare database will continue.

RECOMMENDATION 4

Develop and implement well-defined practices that establish expectations and guide the social work practices of caseworkers within the differential response system.

DCS Response:

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

The Department is currently developing a comprehensive practice model that includes addressing the full continuum of the Department's service delivery system. This practice model

will include information on differential response. The practice model identifies skills for all employees that are necessary for success in all service delivery positions. These skills include: critical thinking, engaging families, teaming and partnering, assessing, planning, etc. Policies and procedures for differential response will be developed to guide the social work practices of caseworkers.

RECOMMENDATION 5

Develop and implement policies and procedures for assessing staff adherence to the defined practices and help ensure the competence of differential response workers.

DCS Response:

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

The Family Assessment Response system will be incorporated into the Department's existing quality assurance protocols. The Department's quality assurance system utilizes review of randomly selected cases by the Practice Improvement Unit, and supervisory review of every case. Through these methods, the Department monitors fidelity to policies, procedures, and practice standards; and identifies opportunities to clarify policies, modify training, or update the practice model.

RECOMMENDATION 6

Develop and implement training for all appropriate staff, including supervisors, regarding the differential response system.

DCS Response:

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

A training plan will be developed in collaboration with the Department's Child Welfare Training Institute (CWTI) and community partners. The training plan will identify the appropriate audiences for the training, outline the learning objectives to be achieved in the training, and expectations for attendance at the training.

RECOMMENDATION 7

Work to:

- a. Identify the array of services that will be available to families in the alternative response track and contract for these services as needed;*
- b. Identify any potential barriers to service accessibility throughout the State, and take steps to address those barriers, as appropriate; and*
- c. Ensure that contractors providing alternative response services are monitored by its contract monitoring unit.*

DCS Response:

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

- a. The Department has engaged in significant research to identify the array of services that will be available and accessible to families served through the alternative response track. These services consist of current contracted services, behavioral health services funded through Title XIX of the Social Security Act, community-based services, and informal supports. The Department will continue to assess community-based services and current contracts to assure the service delivery system meets the needs of families across the state.
- b. The differential response model requires an ongoing assessment of services needed by each family served, and assists the family to obtain the appropriate level of service to meet their identified needs. A key component of differential response is to assist families, on a case-by-case basis, with accessing services when barriers are identified that inhibit access to the needed supports.
- c. The Department continues with the implementation of a contract monitoring system for all agency contracted providers. Once implemented, agencies that provide contracted services to families participating in a differential response will be monitored through this system.

RECOMMENDATION 8

Determine the following, in consultation with Legislature, as needed:

- a. *Whether additional funding will be needed to implement the differential response system and how the funding will be obtained;*
- b. *Whether staff should be dedicated to oversee the differential response system implementation;*
- c. *An appropriate and reasonable time frame for phasing in the differential response system; and*
- d. *Whether additional peer research would be helpful prior to implementation.*

DCS Response:

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

- a. When applicable and if needed, the Department's budget team will complete an analysis of the financial impact of differential response and will work with the Legislature to secure additional funding that may be required to implement the differential response program statewide.
- b. An Implementation Science approach has been used and will continue to be used to implement the differential response system. This model requires oversight by teams of key representatives from within the agency as well as outside stakeholders. The

- Department agrees that dedicated staff will continue to be needed to oversee the implementation of differential response.
- c. Following an Implementation Science approach, the Department will implement the program in phases, in an appropriate and reasonable timeframe, to assure consistency in practice and identify opportunities to modify the service delivery model as necessary.
 - d. The Program Development Unit will continue to seek guidance and information on lessons learned from other jurisdictions across the nation, as needed.

RECOMMENDATION 9

Finalize and implement its strategic communications plan and develop and implement processes to allow stakeholders to provide feedback during implementation.

DCS Response:

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

The Department has drafted a preliminary communication plan for the differential response system. The Implementation Science approach recognizes that communication is critical for the success of the implementation of any new model. Open communication with internal and external stakeholders throughout the development and implementation of the differential response system will continue.

RECOMMENDATION 10

Develop and implement processes for evaluating its differential response system. These processes should review and determine whether the differential response system is being implemented as intended and include an assessment of performance measure such as family satisfaction, employee satisfaction, types of services delivered to families, re-referral rates of families, child removal rates, and cost to implement.

DCS Response:

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

The Department is committed to the inclusion of an evaluation component to identify outcomes for families participating in the program and inform the continuous improvement of the differential response model. Identification of the scope of the evaluation and measures that will be used has not been determined and will depend on the resources available to the Department to engage in a robust system evaluation.