



September 27, 2016

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

Re: Auditor General Report on Permanency Practices

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 Permanency Practices. 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. Please note, the Department has identified caseload size as the most immediate and significant cause of delayed permanency and continues to implement strategic initiatives to reduce caseload size which expedites permanency by decreasing administrative workload.

Thank you for the opportunity to respond to the recommendations.

Sincerely,

Gregory McKay
Director

Enclosure

Cc: Shalom Jacobs, Deputy Director of Operations
Mike Dellner, Deputy Director of Operations
Katherine Guffey, Chief Quality Improvement Officer
Ro Matthews, Chief Enterprise Risk Management Officer
Emilio Gonzales, Audit Manager

**ARIZONA DEPARTMENT OF CHILD SAFETY'S RESPONSE TO THE OFFICE OF THE AUDITOR GENERAL'S
REPORT ON PERMANENCY PRACTICES**

Chapter 1: Department should improve its provision of information to the courts and FCRB

Recommendation 1.1: The Department should take steps to better understand and address court report submission timeliness by:

Recommendation 1.1a: Developing a mechanism for tracking case report submission dates; and

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: Monitoring court report submission dates at the Department without corresponding tracking data from the courts would not allow for the determination of report timeliness or frequency and the subsequent impact on permanency. The timeliness of court report submission cannot be accurately determined because routine monitoring by the courts or the Department does not occur.

Recommendation 1.1b: Reviewing court report submission data to help identify causes for untimely submission, and developing action plans to address these causes.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: See 1.1a, the Department will not track or analyze data associated with untimely court report submission.

Recommendation 1.2: The Department should develop and implement guidance directing the supervisory review of court reports to help ensure that these reports contain the information and level of detail required by its court report templates.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: The Department's policy and standardized court report templates provide the required information based on the current standards identified in state statute and administrative code. Guidance is provided by the Department's supervisors to ensure court reports contain the information and level of detail required.

Recommendation 1.3: Once established, the Department should ensure that its supervisors are trained on the court report review guidance.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: See 1.2, training is not necessary, additional guidance will not be developed.

Recommendation 1.4: The Department should work with the juvenile courts to determine how it can more clearly present new information and/or progress updates in court reports and update its court report templates, as needed.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: The Department's policy and standardized court report templates provide the required information based on the current standards identified in state statute and administrative code. As a part of the Department's Continuous Quality Improvement (CQI) initiatives, court report templates are routinely reviewed and evaluated for appropriate data elements and level of detail. Additionally, the Department is engaged in a project to improve the system-wide application of its child safety assessment model, including judicial review of child welfare cases.

Recommendation 1.5: Once the Department has revised its court report templates to include guidance on incorporating new and/or updated information, it should:

Recommendation 1.5a: Revise its associated policies and procedures for preparing and providing court reports to the juvenile courts to reflect these changes; and

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: See 1.4, policies and procedures do not require revisions or updates.

Recommendation 1.5b: Modify its existing training to include any changes made to its court report templates and train appropriate staff, including supervisors, accordingly.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: See 1.4, training is not necessary, no changes will be made to the court report template.

Recommendation 1.6: The Department should develop and implement policies and procedures to guide its review and use of information from the FCRB monthly attendance reports to improve caseworker attendance and the provision of information to the FCRB.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: The Department's policy is not aligned with Federal and State statutes, which do not require in person or telephonic appearance at FCRB hearings. Policies and procedures to standardize the review of attendance reports does not ensure improved caseworker attendance nor does it improve the provision of information to the FCRB. There is no indication that increased caseworker attendance reduces the time to permanency. Caseworkers often provide statements when they are unable to participate at an FCRB hearing in person or telephonically due to court hearing conflicts, often times on the same case. The FCRB does not consider the statement provided by the caseworker as attendance for the FCRB hearing.

Chapter 2: Department should improve its documentation and timeliness of kin searches

Recommendation 2.1: The Department should establish a formalized monitoring process to help ensure that all staff involved in performing kin searches are documenting the required information in the 'Locate Efforts' case note.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: There is no indication that the documentation of the "Locate Efforts" case note type impacts the percentage of children in kinship placements.

Recommendation 2.2: The Department should develop and implement policies and procedures that establish a formal time frame for the family locate unit to process kin-search requests submitted by caseworkers.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: The policy and procedures for the family locate unit time frames is appropriate. There is no indication that implementing a revised time frame for the family locate unit would impact the percentage of children in kinship placements.

Recommendation 2.3: The Department should identify and implement methods to help ensure that caseworker kin-search requests are processed in a more timely manner, including exploring whether the number of requests made to the family locate unit can be reduced by transferring some of these requests to the family engagement specialists.

Department Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: Volume related family locate needs are addressed by workload redistribution and kin placements continue to increase. There is no national standard set by the federal Department of Health and Human Services for the percentage of children placed with kin. With the national average of 22.6%, the Department placed significantly (42.2%) more children with kin than the national average and has continued improvement year over year since 2010. As of July 2016, 46% of the children in out-of-home care were placed with kin and kin placements are projected to increase by the end of the fiscal year. Kaizen events focused on locating kin continue to be prominent among the Department's process improvement schedule in partnership with the Governor's Transformation Office.

Chapter 3: Department should implement its plans to improve permanency timeliness

Recommendation 3.1: To better achieve permanency in a timely manner, the Department should continue implementing its improvement plan to address the 2015 CFSR findings related to achieving permanency in a timely manner and improving its case planning process.

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

Response explanation: Reducing the time to achieve permanency is an outcome of effective case management, improved family engagement, service array and timely judicial proceedings, all of which are addressed in the PIP dated August 26, 2016.

Chapter 4: Department should implement its plans to improve timeliness of termination of parental rights

Recommendation 4.1: The Department should continue implementing its improvement plan to address the findings of the 2015 CFSR related to the timely filing of TPR petitions.

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

Response explanation: The development of practice guidelines, case review and action plans documented in the PIP will continue with a projected completion date of June 30, 2017

Chapter 5: Department should implement its plans to improve foster home recruitment

Recommendation 5.1: To better recruit and retain foster homes, the Department should:

Recommendation 5.1a: Continue implementing its improvement plan to address the findings of the 2015 CFSR related to foster home recruitment and retention; and

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

Response explanation: Improved foster home recruitment and retention efforts documented in the PIP will continue with a projected completion date of April 30, 2017, technical assistance from the National Resource Center for Diligent Recruitment has been requested and project teams are engaged.

Recommendation 5.1b: Continue with its efforts to improve the recruitment and retention of foster homes by implementing the steps it has identified to address its 2016 strategic plan foster home recruitment and retention goal.

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

Response explanation: As part of the DCS Strategic Plan, the Department is analyzing/examining the initial foster home licensing application process, including the tasks and activities performed by home recruitment, study, and supervision contracted agencies and the responsibilities of the Office of Licensure and Regulation (OLR). This goal is 35% completed and continues in the 2017 strategic initiatives for the Department.

Chapter 6: Department should implement its plans to improve foster children's connections to their family and community

Recommendation 6.1: The Department should continue implementing its improvement plan to address the findings for the 2015 CFSR related to preserving a child's connections to his/her family and community.

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

Response explanation: The development of practice guidelines to improve children's connections to family and community documented in the PIP will continue with a projected completion date of December 31, 2016.