



September 27, 2017

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

Dear Ms. Davenport:

The Arizona Department of Child Safety (Department) appreciates the opportunity to provide this response to the Auditor General's special report on recruitment, training and retention of field staff. The Department is pleased that the Auditor General acknowledged the Department's many current activities to address recruitment, training and retention. In fiscal year 2017, the Department identified a five-year strategic priority to improve performance and quality of services through employee retention. Current strategic actions include realignment of pay structure and job classification for the Department of Child Safety Specialists (caseworkers); improvement of onboarding, training and coaching of all case carrying staff and supervisors; and development of general management and leadership skills in supervisors and managers. These activities, and the others noted throughout the *Arizona Department of Child Safety – Staff Retention, Recruiting and Training* report and the Department's response to the report, were selected by the Department following exploration of need, fit, resources, evidence of effectiveness, agency readiness, and capacity to implement. This exploration is necessary to select the strategic initiatives that are most likely to result in sustained success, and responsibly use state resources for the greatest positive effect.

The Department is thankful for the Auditor General's research about additional promising practices in recruitment, training and retention; and has carefully considered each recommendation. The Department is selective when choosing strategic initiatives, and follows a guiding principal that effective and sustained change occurs when a small number of initiatives are implemented at one time, to allow assignment of sufficient resources and evaluation of intervention effectiveness. The Department engages in continuous improvement, which includes monitoring the effects of the initiatives and adjusting activity if the desired outcome is not being achieved. If the Department's current initiatives do not achieve the desired results, the Auditor General's recommendations will assist the Department by offering promising practices that the Department could implement following exploration of need, fit, agency resources, evidence of effectiveness, agency readiness, and capacity to implement.

The Department's response to the recommendations in the Auditor General's report is enclosed.

Sincerely,

Gregory McKay
Director

Enclosure: DCS Recommendation Response

DCS Recommendation Response

Recommendation 1.1 *The Department should consider implementing a quality control check to help ensure the consistency of turnover information across its reports*

Department Response: The Department agrees with the Auditor General that there should be quality control in data reporting but a different method of dealing with the finding will be implemented.

The Department agrees with the auditors that previously there were data inconsistencies in the historical turnover reports that were reviewed by the Auditor General. The data inconsistencies with the *Turnover by Month* and the *Monthly Staffing* reports referenced in the Auditor General's report were corrected prior to the audit. A standard operating procedure for producing the reports was developed and implemented. The procedures specify that the two reports should contain identical information. The procedure outlines specific steps for validated data. The Auditor General's report found the procedures to be "generally adequate." Additional quality control checks beyond the specified procedures for validating consistency between the reports is not necessary. The Department will continue to follow the written procedures for producing the two referenced reports to ensure accuracy and consistency.

Recommendation 2.1 *The Department should continue to explore opportunities to address salary concerns as resources permit. In doing so, it should consider gathering additional state salary information from other states for benchmarking, as it deems necessary.*

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

The Department values the hard work of its staff and has been pursuing increases to compensation as resources allow. The Department appreciates that the Auditor General's Office agrees with the Department and recognizes that adequate compensation is an issue. As indicated in the Auditor General's report, salary concerns have been identified in exit surveys for case aides and DCS Specialists. The Department increased salaries for the case aide position and accelerated the timeframe for standard DCS Specialist pay increases so that they receive them more quickly. The Department will continue to explore opportunities to address salary concerns.

Recommendation 2.2 *The Department should carry out its plans to implement a peer support program to support staff facing trauma and burnout.*

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

The Department agrees with the importance of implementing a peer support program to address trauma and burnout of staff. To that end, the Department reported during the review that it is in the process of developing a peer support program to support staff facing trauma and burnout. As indicated in the Auditor General's report, the Department will identify a peer support team that will be trained by an external expert. The team will be available for staff who experience a critical incident or stressful work-related situations. The target date for the implementation of the peer support program is fiscal year 2018.

Recommendation 3.1 *The Department should take additional actions to recruit caseworker applicants with backgrounds in social work or related fields by:*

Recommendation 3.1a *Revising its minimum caseworker qualifications to at least include a preference for applicants with a social work or related degree and/or previous child welfare experience. The Department should then prioritize its recruitment and hiring of applicants in accordance with this preference.*

Department Response: The Department agrees with the Auditor General that recruiting social workers may improve retention but a different method of dealing with the finding will be implemented.

The Department agrees that retention may be higher among DCS Specialists who have a social work degree, but does not agree with changing the minimum qualifications of the DCS Specialist. Many factors influence whether or not an applicant will be successful as a DCS Specialist. One such factor is workload. The Department's primary avenue to improve retention a year ago was to fill vacancies with suitable applicants who could be trained so that workload would be reduced, as workload was cited as a reason for leaving the Department. As noted in the Auditor General's report, the Department previously allowed preference to DCS Specialist applicants with social work backgrounds but revised the educational qualifications to remove these preferences in July 2014 in order to fill positions. Additionally, in an effort to strengthen recruitment practices, the Department revised the minimum qualifications for the DCS Specialist position to allow for previous child welfare experience (specifically, five years of experience as a DCS Case Aide II), as stated in the Auditor General's report.

The Department has not seen strong evidence of a positive correlation between a social work degree and retention, and therefore cannot conclude that preference for this degree would improve and not damage retention. The Department has reviewed materials available through the National Child Welfare Workforce Institute that demonstrate there is not conclusive evidence nor consensus that child welfare hiring practices should give preference to individuals with social work degrees. While some materials recommend preference for social work degrees, others suggest seeking applicants with diverse majors and degrees, giving greater weight to competencies over degree, and considering factors such as the linguistic match to communities served.

With a decrease in both vacancies and workload, the Department is better positioned to review the degrees of the applicants, as well as other traits that have been shown to increase success as a DCS Specialist. The Department can consider preference of those applicants with a social work degree or a related degree without changing the minimum DCS Specialist qualifications.

Recommendation 3.1b *As resources allow, participating in additional recruiting activities at the universities to recruit applicants earning social work or related degrees who are not part of the tuition assistance program. As needed and as resources permit, the Department could also consider attending recruiting activities at universities in bordering states, such as Nevada, New Mexico, and Utah, to recruit caseworker applicants for rural Arizona cities.*

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

The Department does not agree with the finding of participating in additional recruiting activities at universities to target social workers and will not implement the recommendation. As stated in the Auditor General's report, resource constraints do not allow the Department to participate in additional university recruitment activities in-state and in bordering states. In addition, the Department is not experiencing a shortage of DCS Specialist applicants. Given that there is not strong evidence of a positive correlation between a social work degree and retention, the Department believes that attending recruiting activities in bordering states would not be the most responsible use of state resources.

The Auditor General's report acknowledges that the Department's recruitment and retention partnership with Arizona State University (ASU) and Northern Arizona University (NAU) for the tuition assistance program helps recruit staff. As another recruitment strategy, the Department supports the placement of interns, who are not part of the tuition assistance program, to provide on-the-job experience in their enrolled area of study with the Intern Management Policy that was implemented on June 21, 2017. The partnership with the ASU training units and other internship programs incentivize and encourage social workers to work for the Department. The Department will continue the tuition assistance program and internships, and expects these university partnerships will become the primary recruitment activity for recruiting DCS Specialist applicants.

Recommendation 3.2 *The Department should enhance the use of its RJP video to further encourage applicants to watch and reflect on the video and help it assess applicants' job fit. For example, the Department could inform applicants that they will be asked questions about the video in the interview and then ask questions based on the video that help the Department assess the applicants' job fit.*

Department Response: The Department agrees with the Auditor General that it is important for applicants to understand what the job entails, but a different method of dealing with the finding will be implemented.

The Department currently requires DCS Specialist applicants to view the RJP video, which includes the core area highlighted in child welfare research and referenced in the Auditor General's report. Although applicants are not asked to reflect on the video, the current hiring process helps to ensure alignment of applicants' expectations with the requirements of the job. As referenced in the Auditor General's report, applicants are asked if they viewed the video. Although applicants are not asked specific interview questions to assess their understanding and reactions to the video, the current behavioral-based questions help to assess the applicant's expectations with the requirements of the job. Applicants are also required to sign the *Job Functions and Employment Requirements* Form that clearly outlines the job functions and requirements.

The Department does not agree to enhance the use of the RJP video to further encourage applicants to watch and reflect on the video. It is not possible to fully capture the aspects of the DCS Specialist position in an RJP video, and these are better understood through on-the-job training in the field. To that end, newly hired DCS Specialists attend two weeks of initial CORE training and then are sent into the field to shadow a case manager. This actual, real life, field experience, within two weeks of beginning the job, is much more effective in giving new DCS Specialists insight into the job duties than a video.

Recommendation 3.3 *As the Department continues its efforts to improve its caseworker applicant assessment tools, it should revise or implement additional assessment tools that would help better assess applicants' observational skills and planning and organizing work skills. The Department should*

also consider whether there would be benefit in taking a similar approach in its assessment of program supervisor applicants.

Department Response: The Department agrees with the Auditor General that an assessment tool is important for assessing applicants, but a different method of dealing with the finding will be implemented.

The Department agrees that it should continue efforts to improve its tools for assessing applicants' skill set. As stated during the review, the Department has utilized the Predictive Index (PI) Behavior Assessment for DCS Specialist candidates since November 2016 as a pilot to establish behavioral requirements for the DCS Specialist position. The PI is a reliable resource for predicting performance potential in new hires. The assessment gathers information about the applicant's self-concept that includes: self-awareness, confidence, interpersonal relationships, self-concept, etc. The assessment also provides a list of characteristics relevant to a the DCS Specialist position in the following areas: pace and variety of activities, focus, decision-making, communication, collaboration, delegation and leadership styles.

As stated in the Auditor General's report, the Department is gathering data for the creation of interview questions at this time. As of March 14, 2017, all candidates for the DCS Specialist position began receiving a link to complete the PI. The Predictive Index is available, upon request of the hiring supervisor/manager, for all job classifications.

The current utilization of the PI will continue and revised or additional assessment tools will not be implemented at this time.

Recommendation 3.4 *The Department should ensure that, when possible, program supervisors participate in the interview for caseworker applicants for positions in their units.*

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

The Department agrees that applicants who are interviewed by their potential supervisor may be more likely to be assessed for best fit in their position. Supervisors do currently participate in interview panels to evaluate potential DCS Specialists for vacancies in their units in some areas of the state. It is not always feasible for future supervisors to interview potential DCS Specialists hired for their vacancies. The supervisor participating in the interview panel typically has a vacancy they need to fill. However, the DCS Specialist may be placed in an office that is in closer proximity to their home. In some instances, the DCS Specialists are assigned to their supervisor at a future point in time after the hiring process has taken place. The current interview process of DCS Specialist applicants will continue and Program Supervisors will participate in the interview for DCS Specialist applicants for positions in their units, when possible.

Recommendation 4.1 *The Department should continue to implement its new processes for monitoring participants' compliance with its tuition assistance program and collecting repayment from participants who do not meet their employment obligations..*

Department Response: The Department agrees with the Auditor General that it should continue to implement its current processes for monitoring compliance with its tuition assistance program and the recommendation to continue the current program will be implemented.

The Department agrees that tracking participants' compliance with the tuition assistance program and collecting repayment from those participants who do not meet their employment obligations is important. Although the tuition assistance program is a recruitment strategy, monitoring compliance and collecting repayment from the participants of the program is not viewed as part of the recruitment strategy, and is therefore outside the scope of this auditⁱ.

The Department implemented this recommendation and refined a process to monitor the fulfillment of DCS Specialists' obligation to the Department after hire. A policy for the repayment and collection of funds for those who do not fulfill their obligation was published on February 8, 2017. With the publication of the policy, no further action is necessary to implement the policy, as the policy is active and will be enforced.

Recommendation 4.2 *Consistent with federal requirements, the Department should evaluate its tuition assistance program beyond monitoring participants' compliance with their employment obligations for internal management purposes.*

Department Response: The Department agrees with the Auditor General that it should continue to comply with federal requirements around the tuition assistance program, and will continue to comply with the federal requirements as recommended.

The Department agrees to follow the federal requirements of evaluating its tuition assistance program, in accordance with 45 CFR § 1357.15. The Department will continue to follow the goals and objectives described in the Child and Family Services Plan (CFSP) for fiscal years 2015 – 2019 for the evaluation of the tuition assistance program. Section VI of the CFSP describes an objective and a benchmark of continually reviewing the tuition reimbursement programs as measured by vacancy and turnover rates.

Recommendation 5.1 *The Department should continue its efforts to address the issues it identified regarding the consistency and quality of support provided to caseworker trainees. It should also monitor and assess whether its efforts result in improved support for trainees and, if not, identify and take additional steps to improve trainee support, as needed.*

Department Response: The Department agrees with the Auditor General that it should continue its current efforts to address quality of support issues in training and the recommendation to continue the current process will be implemented.

The Department agrees that providing quality support to DCS Specialist trainees is critical. The Auditor General's report indicates the Department's use of mentoring and field training is consistent with child welfare best practices. The report also identified mentoring and supervision as a way to provide trainee support.

The Department will continue to support the field training model to the extent that resources allow. The Auditor General's report indicates the Department is finalizing the redesign of the DCS Specialist core training program. Considering the lack of resources for additional Field Training Officers (FTOs), this mentor role has to be filled by someone in the field. The Department's Training Administrator continues to attend regional supervisor meetings to discuss the need and importance of the mentor role for new hires. These meetings are an opportunity to hear from the field about what barriers they may be faced

with in assigning the mentors, and discuss how they can be supported to ensure this necessary role is fulfilled. There are plans to meet with all regional program supervisors by October 31, 2017. The next steps will then be determined.

Recommendation 5.2. *The Department should carry out its plans to revise its core supervisor training. As part of this effort, the Department should (1) incorporate mentoring into the supervisor core training and (2) increase opportunities for supervisors to interact with another.*

Department Response: The Department agrees with the Auditor General that it should continue its current plans for revising core supervisor training and the recommendation to continue its current process will be implemented.

The Department agrees it should enhance its supervisor training. In fiscal year 2017, the Department identified a five-year strategic priority to improve performance and quality of services through employee retention. Current strategic actions include training and coaching of all case carrying staff and supervisors; and development of general management and leadership skills in supervisors and managers.

As referenced in the Auditor General's report, the Department plans to partner with ASU to revise its supervisor core training. The Department has a 25-year history with Arizona State University, along with a shared commitment to child welfare training and social work best practices. The Department will continue to identify any necessary revisions and will continue to leverage that partnership.

The Department is developing a draft career roadmap and leadership competencies for all levels of leadership that is due by December 31, 2017. Once the roadmap and competencies are developed, curriculum will be developed and implemented for the first time leaders by June 2018.

The Department is exploring the "mentoring" structure for supervisors but is also considering the supervision circle model that was developed by ASU.

Recommendation 5.3 *The Department should develop a formal training program for its program managers that includes mentoring and networking opportunities.*

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

The Department agrees with developing a formal training program for its program managers. The Auditor General's report indicates the Department does provide training opportunities for Program Managers and Program Managers are typically promoted from Program Supervisors; therefore, have completed supervisor core training. The Department continues negotiations with the Arizona Department of Administration (ADOA) to purchase the leadership courses previously offered by ADOA. As stated in the Auditor General's report, there are opportunities for informal mentoring and networking with peers. The Department is developing a draft career roadmap and leadership competencies for all levels of leadership that is due by December 31, 2017. Once the roadmap and competencies are developed, curriculum will be developed and implemented for the first time leaders by June 2018.

Recommendation 5.4 *Consistent with federal requirements, the Department should develop and implement a continuous training requirement and document this requirement in policy. In doing so, the Department should determine the amount of training its staff should complete on an ongoing basis, such as a minimum number of annual training hours, and how to track this training's completion.*

Department Response: The Department agrees with the Auditor General that the Department should follow federal requirements regarding staff training but a different method of dealing with the finding will be implemented.

The Department agrees that providing continuous training is critical to staff being successful in their roles, and will continue to provide ongoing training opportunities as required by federal regulation. Federal regulation (45 CFR § 1357.15(t) requires that the State's Child and Family Services Plan include a "staff development and training plan in support of the goals and objectives in the CFSP...," and that "Training must be an ongoing activity..." The federal regulation does not require that states identify a minimum number of annual training hours.

The Auditor General's report notes that the Department currently offers ongoing training opportunities to staff "beyond the mandatory core training and CBTs by offering additional courses that staff may take, as well as other trainings developed to address policy changes." The Department identifies training topics throughout the year, as needs arise, and will continue to do so.

The Department submits a training plan to the federal government annually, as required by federal regulation. The Arizona Staff and Provider Training Plan submitted in June 2017 to the federal Children's Bureau provides the following information about the Department's ongoing training opportunities for caseworkers and supervisors:

Ongoing and Advanced Training – Several opportunities for ongoing and advanced training are offered to Department staff. One-on-one coaching and training on an array of topics (such as CHILDS) is available at the request of the field. This may be provided in a variety of methods, including classroom setting, on-site by CWTI, or through contracted providers. Additionally, Computer Based Training (CBT) is developed by CWTI at the request of the field. These trainings are considered short-term and the duration varies by topic. Trainings include policy refreshers, supervisory summits on multidisciplinary practice, behavioral health coordination, workload management, and new topics not yet incorporated into General Core Training.

The following short-term, part-time Advanced Training courses were developed and are provided by CWTI.

- Staff Safety
- Advanced Joint Investigations
- Partnering with Foster Parents
- DPS Reading a Rap Sheet
- CHILDS Refresher
- Preventing Sex Trafficking
- Domestic Violence
- Engagement
- Independent Living Certification training
- In-home

- Team Decision Making (TDM)
- Team Decision Making for Facilitators
- Hotline Specialist Core
- Fostering Sustainable Connections (FSC), A Family Finding Model

In addition, DCS Program Supervisors and Program Managers attend a two-day Leadership Summit annually, which provides education about a variety of topics relevant to child welfare practice. One hour monthly webinars, known as Quality Conversations, are also available to DCS employees and provide information about current policy and practice. Recent topics include: Safe Sleep Campaign, Placement Stability, Reunification Planning and Services, Assessing Safety in Families Experiencing Domestic Violence, After Care Planning, Family Functioning Assessments, Parent Readiness for Change and High Quality Contacts with Parents. In June through August 2017, all DCS Specialists, Program Supervisors, Program Managers and Program Administrators attended either two or five days of training on the Department's safety assessment and safety management practice model.

The Department's supervisors, managers and administrators all have access to the administrative side of the Learning Management System (LMS) to review and track their direct reports training history.

The Department will continue to design and deliver ongoing training opportunities such as those described above.

Recommendation 5.5 *The Department should identify and implement additional accountability mechanisms that ensure (1) staff responsible for tracking and monitoring training completion do so in accordance with department processes and (2) all staff comply with the Department's training requirements for their positions.*

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

The Department agrees to continue tracking and monitoring staff training completion but does not agree that it is necessary to identify and implement additional accountability mechanisms. As referenced in the Auditor General's report, supervisors are responsible for tracking and monitoring the completion of mandatory training of their direct reports. All supervisors, managers and administrators all have access to the administrative side of the Learning Management System (LMS), so they can review direct reports' training transcripts. The employees can also view their transcripts in the LMS. Administrative access has been provided to various roles in the Department who have the authority to pull reports. The LMS has an online Participant User Guide that includes instructions for the user to query training transcripts for direct reports.

The current training tracking process will continue.

Recommendation 5.6. *The Department should continue to develop and implement its training evaluation processes, such as the quarterly and annual training reviews and training audits. It should also continue to identify and assess opportunities for further developing its training evaluation efforts.*

Department Response: The Department agrees with the Auditor General that it should continue to develop its training evaluation process but a different method of dealing with the finding will be implemented.

The Department agrees to continue its efforts to further develop training evaluation processes. Quarterly and annual curriculum reviews to update training have been scheduled. In addition, ASU and the Department continue to meet with field supervisors and trainees, soliciting input surrounding the effectiveness of training. Course content is modified as appropriate. Data is evaluated from pre-tests that establish a baseline of subject matter understanding, and post-tests that are completed by each trainee after each DCS Specialist training module to measure comprehension of the training.

An audit process is also being developed to ensure all trainers have the most current materials and training is conducted uniformly. The target date for finalizing the training program is December 31, 2017.

ⁱ As required by Laws 2016, Ch. 123, § 7, the report “shall review the department’s recruiting, training, retention and use of staff who are critical to the mission of child safety, including caseworkers, supervisors, case aides, assistant program managers and office of child welfare investigations staff, compared to other states and best practices.”