

A REPORT
TO THE
ARIZONA LEGISLATURE

Performance Audit Division

Performance Audit

Department of Economic Security

Division of Children, Youth,
and Families

Child Protective Services—
Foster Care Placement Stability and
Foster Parent Communication

JULY • 2003
REPORT NO. 03 – 05



Debra K. Davenport
Auditor General

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AUDITOR GENERAL

WILLIAM THOMSON
DEPUTY AUDITOR GENERAL

July 23, 2003

Members of the Arizona Legislature

The Honorable Janet Napolitano, Governor

Ms. Mary Gill, Acting Director
Department of Economic Security

Transmitted herewith is a report of the Auditor General, A Performance Audit of two areas related to foster care services provided by the Department of Economic Security, Division of Children, Youth, and Families, Child Protective Services: the stability of foster care children's living situations and communication with foster parents. This report specifically addresses a legislative request approved by the Joint Legislative Audit Committee on August 9, 2001, and was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1279.03. I am also transmitting with 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 Department 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.

This report will be released to the public on July 24, 2003.

Sincerely,

Debbie Davenport
Auditor General

Enclosure

SUMMARY

The Office of the Auditor General has conducted a performance audit of two areas related to foster care services provided by Child Protective Services (CPS): the stability of foster care children's living situations and communication with foster parents. CPS is a function of the Division of Children, Youth, and Families within the Department of Economic Security. This audit specifically addresses a legislative request approved by the Joint Legislative Audit Committee on August 9, 2001, and was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03.

As of March 31, 2003, over 6,800 children were in foster care in Arizona. Children may be initially placed in shelters or receiving foster homes while their needs and available care options are identified. If children cannot subsequently be placed with a relative, CPS looks to other alternatives, such as placement with trained foster parents or in a group home. Foster care is intended to be a short-term or temporary solution. Once a child is placed in foster care, CPS case managers develop a plan for permanent placement and work to achieve this plan. Approximately 2,300 children left foster care for a variety of reasons between October 1, 2002, and March 31, 2003, the most current 6-month reporting period for which data is available, including being returned to their parent, adopted into a new family, or being placed with relatives.

Over 6,800 children were in foster care as of March 31, 2003.

Foster care placement stability can be improved (see pages 9 through 15)

The Division should continue its efforts to ensure foster care placements are stable. Research indicates that there are significant negative impacts for foster children when they are moved frequently while in out-of-home care. The U.S. Department of Health and Human Services has established national standards for child welfare and child protection programs and monitors states to determine whether they are meeting them. The 2001 federal review found that Arizona, like most other states, is not meeting the standards for foster care placement stability.

Like most states, Arizona is not meeting federal placement stability standards.

In response to the federal review, the Division has developed an improvement plan with steps for improving placement stability. For example, the federal review determined that foster families needed greater preparation and support. The Division revised its policy to specify in the child's Out-of-Home Care Plan the services that the foster parent needs to care for the foster child. In addition to the changes being implemented through the improvement plan, the Division can also enhance some other processes to help improve placement stability. These include:

- Clarifying its policy regarding case manager face-to-face visits with foster children. Current policy calls for the case manager to visit foster children monthly, but the policy also allows visits by others, such as other CPS staff or counselors, to substitute for the case manager visits. In contrast, Alabama and Delaware, both states found to be doing well in the area of placement stability, report they rarely, if ever, allow substitute visitation.
- Evaluating the potential costs and benefits of adopting innovative approaches other states use. These include placing children from only one family in a foster home rather than mixing foster children from several different families, or determining if temporary shelter care placements can be reduced by making the child's first placement a foster home rather than a shelter. Currently, children may be initially placed in shelters or receiving foster homes while their needs and available care options are identified. However, children may then have to be moved to another placement, such as a family foster home.

To ensure that these potential changes and other changes that the Division is already undertaking to improve placement stability have the desired results, the Division should use its existing internal quarterly review process to assess their impact.

Foster parents report good communication, but improvements can be made (see pages 17 through 25)

Although there are several good mechanisms for foster parents to receive and provide information about the children in their care, additional steps can be taken to improve communication. This audit was approved by the Joint Legislative Audit Committee, in part, as a response to some foster parents' concerns raised to the Legislature about their ability to provide input regarding their foster children. Research indicates that to successfully care for children, foster parents need adequate information about the children in their care, including knowledge of case plans and medical and behavioral information.

Foster parents report that several communication mechanisms provide them with helpful information and allow them to actively participate in their foster children's

cases. For example, CPS case manager visits help foster parents to ask questions, or request things that they or the child need. Of the 26 foster parents auditors interviewed, 15 reported that they see the CPS case manager regularly and are able to ask questions, or request things that they or the child need during the visits. Additionally, foster parents report that they participate in Foster Care Review Board hearings. The Board is required to review all cases where a child is in an out-of-home placement within 6 months of the child's removal and every 6 months thereafter. Twenty-three of the 26 foster parents interviewed reported that they attend board hearings, they can speak openly about the child's needs, and their input is positively received. Similarly, 18 foster parents reported that the Division's newsletter for foster parents contains useful information.

Although several existing communication mechanisms are helpful, others need improvement. Specifically, the majority of foster parents auditors interviewed reported that while they received information when children were initially placed in their home, the information was insufficient. For example, a foster parent indicated that she was not told about a child's medical condition and another stated that she had not been told about the behavioral problems of two children placed in her care. Of special concern, 16 of the 26 foster parents auditors interviewed said that they believed CPS had withheld known medical or behavioral information. In some cases, CPS may not know the information and, therefore, cannot provide it to foster parents. In other cases, however, such as when a child is initially placed in a shelter before moving to a family foster home, CPS has an opportunity to gather the information foster parents need. To address these problems, the Division should form a work group, including foster parents, to review what type of information is provided to foster parents about the children in their care, and how best to ensure this information is provided in a timely manner and updated regularly.

The Division also needs to address other foster parent communication problems. For example, the Division could use foster parent training to ensure that foster parents are informed of their right to attend Juvenile Court hearings and are made aware of all the appeal and grievance processes available to them. The Division should also take additional steps to ensure that training provided to foster parents is consistent and provides more practical information on handling medical and behavioral problems.

A review of best practices and other states' activities also suggests that the Division should increase its support mechanisms for foster parents and improve its Internet resources. First, the Division needs to establish a more comprehensive method of surveying foster parents so that they can provide meaningful input about their experiences. Second, the Division needs to enhance foster parent support groups. According to the National Foster Parent Association, Arizona is one of the few states that do not have a state-wide foster parent association. While there are some local foster parent support groups, a state-wide association could ensure all foster parents have access to needed support, while providing additional resources to existing

groups. Strong support groups or mentoring systems are important because nine of the foster parents auditors interviewed noted that they rely on information and support they receive from other foster parents. Finally, the Division could better support foster parents by improving its Web site to include a special section that is devoted solely to providing information and support to foster parents, as is done in Arkansas, Colorado, Illinois, Iowa, and Vermont.

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INTRODUCTION & BACKGROUND

The Office of the Auditor General has conducted a performance audit of two areas related to foster care services provided by Child Protective Services (CPS): the stability of foster care children's living situations and communication with foster parents. CPS is a function of the Division of Children, Youth, and Families within the Department of Economic Security (Department). This audit specifically addresses a legislative request approved by the Joint Legislative Audit Committee on August 9, 2001, and was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03.

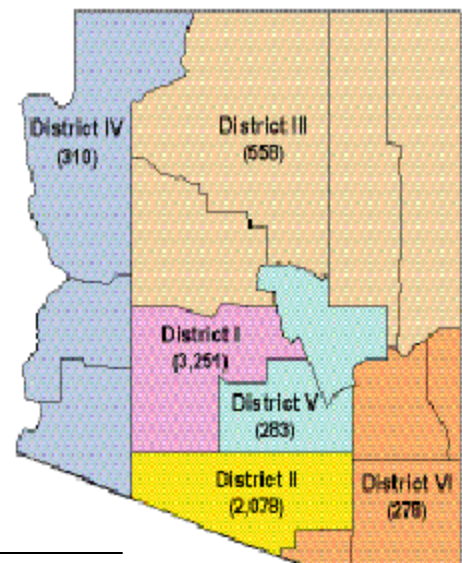
Abused and neglected children placed in foster care

CPS has statutory authority to remove abused and neglected children from their homes and place them in out-of-home care, often referred to as foster care. Arizona Revised Statutes §8-821 provides that a child may be removed if he or she is either "suffering or will imminently suffer abuse or neglect" or "suffering serious physical or emotional damage that can only be diagnosed by a medical doctor or psychologist." Although the Department has the authority to initially remove a child from his or her home, it must receive approval from the Juvenile Court or a Voluntary Foster Placement Agreement with the child's parents in order for the child to remain in foster care. As of March 31, 2003, over 6,800 children were in foster care, as illustrated in Figure 1, ranging in age from less than 1 year to over 18 years, as illustrated in Figure 2 (see page 2).

Children, upon removal from their homes, may be initially placed in shelters while their needs and available care options are identified. Federal law requires that children be placed in the least restrictive, or most family-like, setting possible. Therefore, CPS attempts to locate relatives to care for removed children, rather than placing them in another setting. If a suitable relative cannot be found, a variety of other foster care settings are available, including:

Over 6,800 children were in foster care as of March 31, 2003.

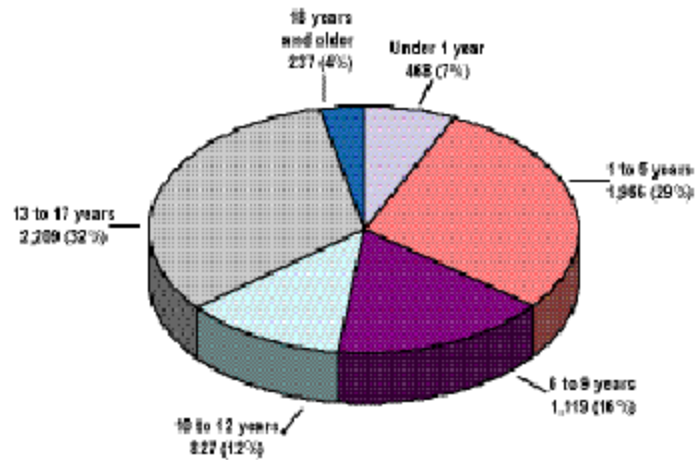
Figure 1 Number of Children in Foster Care by District As of March 31, 2003¹



¹ In addition, 68 children were not included in this district breakout for reasons such as being placed with a relative outside the State of Arizona.

Source: Data provided by the Department of Economic Security.

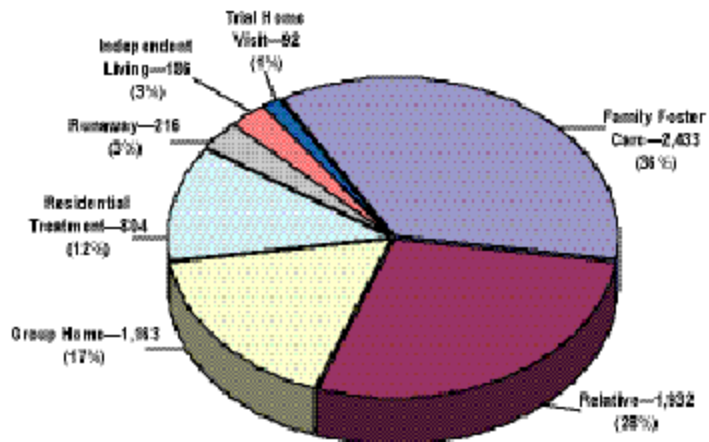
Figure 2 Children in Foster Care by Age
As of March 31, 2003



Source: Auditor General staff analysis of *Child Welfare Reporting Requirements Semi-Annual Report for the period of October 1, 2002 through March 31, 2003.*

- **Family foster care homes**—A licensed person maintains a home and is reimbursed by the Department to provide room, board, and care to foster children. The largest percentage of children in foster care are in family foster care homes, as shown in Figure 3.

Figure 3 Number of Children in Foster Care by Placement Type
As of March 31, 2003



Source: Auditor General staff analysis of *Child Welfare Reporting Requirements Semi-Annual Report for the period of October 1, 2002 through March 31, 2003.*

- **Group home**—A licensed foster home that cares for five to ten children.
- **Residential treatment**—A licensed behavioral health agency hires trained professional staff to provide daily care and treatment to a group of children. These facilities typically include an onsite school.
- **Independent living subsidy program**—Dependent youth who are at least 17 years old can live on their own in the community while still receiving services from the Department until they reach the age of 21.
- **Trial home visit**—Foster children can be returned to their family on a trial basis but still remain under the court's jurisdiction. The Department retains legal custody and provides ongoing supervision.

Case plans identify children's needs and goals

Once a child is removed from his/her home and placed in foster care, CPS case managers must develop a case plan for the child and his/her parent(s) or legal guardian(s). Case plans identify permanency care goals for the child, such as return to parent, or adoption, and the services a child may need. A wide variety of services is available to foster children, including medical, dental, and psychological care. The case plan also identifies the services the child's parent and caregiver needs.

The Division and Juvenile Court monitor the child's and the parent's progress in meeting case plans. For example, CPS case managers are required to conduct a face-to-face visit with children in foster care at least monthly. At least one visit in every 3-month period must be in the foster care provider's home. However, the case manager's supervisor may approve another division employee or another

Facts about Arizona Family Foster Homes

- Family foster homes are paid an average of \$570 per month per child.¹
- 1,865 homes held licenses as of March 31, 2003.
- To become licensed, potential foster parents must meet numerous requirements, including:
 - ◆ Provide information about their health, employment, budget, family relationships, daily routine, spiritual beliefs, and child care experience;
 - ◆ Provide at least five character references;
 - ◆ Complete a CPS background check;
 - ◆ Complete a Department of Health Services inspection of their home for sanitation and safety verification, including their heating and cooling systems, electrical wiring, sewer disposal system, waste storage and removal, and other health and safety elements; and
 - ◆ Complete at least 12 hours of initial training.

¹ State of Arizona Department of Economic Security, *Division of Children, Youth and Families Fiscal Year 2003 Legislative Briefing Book*, 2003. Daily rates for family foster homes per child range from \$12.57 to \$30.44, based on the child's age and needs.

Key Parties Involved with Foster Care

- **CPS case manager**—Plans, coordinates, and monitors foster child's care on behalf of the State.
- **Foster parent**—Provides room, board, and care to the child.
- **Licensing agency**—Recruits, trains, and monitors foster homes. This may be a private organization under contract with the Department, or the Department's Office of Licensing, Certification, and Regulation.
- **Service providers, such as counselors**—Provides services as directed in the child's case plan.
- **Foster Care Review Board**—Reviews each foster care child's case at least once every 6 months to determine and advise the Juvenile Court on progress toward the case plan goal.
- **Juvenile court judge**—Reviews the Division's request to place the child in foster care, and permanency goals for the child.

Case managers are required to visit foster children at least monthly.

involved professional person, such as a counselor, to make the face-to-face contacts, but not the quarterly in-home visits. Other parties also monitor the case's progress, such as the Foster Care Review Board, which reviews foster children's cases every 6 months and makes recommendations to the Juvenile Court about the child's future.

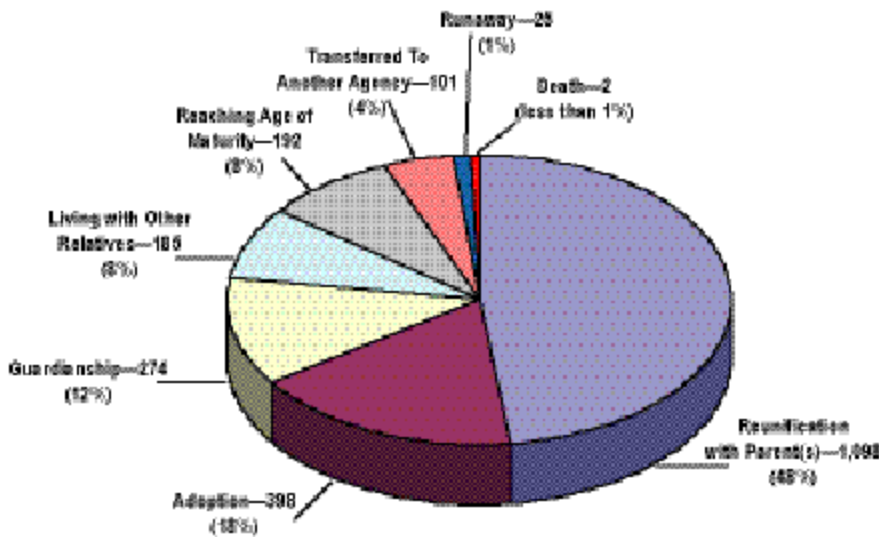
Children leave foster care for a variety of reasons

Over 2,200 children left foster care between October 2002 and March 2003.

Because foster care is intended to be a short-term or temporary solution, CPS case managers work to move foster care children to the permanent placement outlined in

their case plans. As illustrated in Figure 4 , 2,275 children left foster care for a variety of reasons during the most recent reporting period (October 1, 2002, through March 31, 2003) including:

Figure 4 Reasons Children Left Foster Care
October 2002 through March 2003



Source: Auditor General staff analysis of *Child Welfare Reporting Requirements Semi-Annual Report for the period of October 1, 2002 through March 31, 2003*.

- **Reunification with parent(s)**—Almost half of the children were reunited with their parent(s) or primary caretaker.
- **Living with other relatives**—If the child cannot return safely to his/her parent, the Division may identify relatives who are willing to care for the child.
- **Adoption**—If the child cannot be safely returned home and no relatives are available, the child can become legally free to be adopted into a new family. Most children are adopted by relatives or their foster parents.

- **Guardianship**—The court can appoint a permanent legal guardian for the child. Relatives or foster care providers can act as legal guardians.
- **Reaching age of majority**—Children may reach adulthood while under the Division's supervision.

- **Transfer to another agency**—Some children's cases are moved to another agency's jurisdiction. For example, some Native American children's cases can be transferred to tribal courts.
- **Runaway**—Sometimes a child may run away from foster care. If the case manager and the police are unable to locate the child, the Juvenile Court may dismiss the child's petition.

Recent reviews

During the course of this audit, the Department was undergoing three other outside reviews, which included work related to the same topics as this audit.

Accreditation—First, the Division is seeking accreditation by the nationally recognized Council on Accreditation, which was co-founded by the Child Welfare League of America. Division management envisions that the accreditation process will help improve the agency's credibility, standardize the Division's policies and procedures, engage staff in self-evaluation and self-improvement efforts, and provide staff with a sense of being part of a profession that adheres to standards and goals. Many public and private organizations are accredited, such as the State of Illinois' Department of Children and Family Services.

In order to meet accreditation requirements, the Division first completed a self-study in June 2002. The Division was then visited by several teams of child welfare experts and professionals who, during different on-site visits, reviewed 600 case files from across the State, and talked to staff, foster and kin care providers, adoptive parents, children in care, and community stakeholders. The Council then provided a series of preliminary accreditation reports to the Division between September and November 2002. The Council found that the Division currently does not meet all requirements for accreditation. For example, four of the Division's six regions did not meet standards related to intake, assessment, and service planning. In contrast, all of the Division's regions met numerous other standards, including ethical practice, organizational integrity, human resource management, culturally competent practice, and compliance with legal and regulatory requirements. The Council is allowing the Division to make program improvements before responding to all the preliminary reports, and no specific time frame for completing accreditation has been established.

Federal review—Additionally, the Department underwent a Child and Family Services Review (CFSR) by the U.S. Department of Health and Human Services. Conducted in 2001, this review evaluated how well the Department provides for child safety, permanency, and well-being.

The Division is in substantial compliance with some, but not all, federal review areas.

Under Executive Order 2003-4, the Children's Cabinet includes:

- a. The Governor.
- b. The Director of the Arizona Department of Economic Security or his/her designee.
- c. The Director of the Arizona Department of Health Services or his/her designee.
- d. The Director of the Arizona Health Care Cost Containment System or his/her designee.
- e. The Superintendent of Public Instruction or his/her designee.
- f. The Director of the Department of Juvenile Corrections or his/her designee.
- g. The Director of the Arizona Department of Adult Corrections or his/her designee.
- h. The Chair of the Arizona Supreme Court's Committee on Juvenile Courts or his/her designee.
- i. The Executive Director of the Governor's Community Policy Office.
- j. The Director of the Governor's Division for Children.
- k. The Governor's Human Services Policy Advisors.

Similar to the accreditation process, the federal review started with the Division conducting a state-wide assessment. Specifically, the Division compiled child welfare and child protection program information regarding systemic factors and outcome indicators. In the second phase, a group of 54 federal and state representatives conducted onsite reviews in Maricopa, Cochise, and Yavapai Counties. Reviewers examined a total of 50 cases, including cases where children received services in their own homes or were placed in foster care, and conducted interviews with approximately 125 state and local stakeholders, including foster parents, case managers, supervisors, citizen review boards, judges, and other community partners.

The results of the state-wide assessment, onsite reviews, and stakeholder interviews were compiled into a final report issued on February 1, 2002. The federal government found that the Division substantially complied with some, but not all, national child welfare standards. Specifically, the Division substantially complied with national child welfare standards in five out of seven systemic areas, including its state-wide information system, case review system, service array, agency responsiveness, and foster parent recruitment, licensing, and retention. Likewise, the Division substantially met some national standards for child welfare outcomes, including child safety. In contrast, the Division did not substantially meet standards related to two systemic factors, including quality assurance and training, as well as child welfare outcomes related to permanency, and child and family well-being. The Division subsequently developed a mandated Program Improvement Plan (PIP), which identifies how it will rectify identified problems.¹

Governor's initiatives—Finally, the Governor issued an executive order in January 2003 that focused attention on the Division and other child and family service providers. Specifically, Executive Order 2003-4 created two groups: (1) the Children's Cabinet, to focus attention and resources on problems facing Arizona's children; and (2) the Advisory Commission on Child Protective Services Reform, to make recommendations to the Governor and the Cabinet on how Arizona can carry out its mission of serving the best interests of children, particularly those in the greatest need of protection. The Commission formed seven sub-committees specializing in Health Services, Education Services, Community Services, CPS Structure and Location, Juvenile Justice Issues, Records and Hearings, and Reports to CPS, which met between February and June 2003. The final report of the Governor's Advisory Commission was released on June 30, 2003 and includes more than 40 recommendations. Some of these recommendations pertain to foster care, including a recommendation to establish a policy indicating that, unless there are safety concerns, children should

¹ Deficiencies related to foster care placement stability and foster parent communication will be discussed in Finding 1 (see pages 9 through 15) and 2 (see pages 17 through 25), respectively.

be placed with their siblings and relatives in their own neighborhoods and communities; and a recommendation to enhance the recruitment, support, and payment for family foster homes and reduced reliance on group homes or other non-family placement settings.

Audit scope and methodology

Consistent with the legislative request, this audit focuses on the stability of foster care children's placements and the Division's communication with foster parents. This report includes findings and recommendations in two areas:

- The Division should continue its efforts to ensure foster care placements are stable.
- The Division should take additional steps to improve communication.

Auditors used a variety of methods to study the issues addressed in the report and, to the extent possible, used information from the other division reviews to evaluate foster care placement stability and the quality of foster parent communication. For example, to gather existing information and understand current division efforts to improve foster care stability and communication with foster parents, auditors reviewed the preliminary results of the accreditation process, documents related to the federal CFSR report including the Division's Program Improvement Plan, and Executive Order 2003-4 and related planning documents regarding child welfare initiatives.

To understand the foster care process and the Division's responsibilities, auditors reviewed state statute, Arizona Administrative Code, federal law, and the Division's policy manual. Additionally, auditors interviewed more than 20 field staff including case managers, unit supervisors, and district administrators. Auditors also interviewed officials from the U.S. Department of Health and Human Services, Child Welfare League of America, and the National Resource Center for Foster Care and Permanency Planning to identify best practices in foster care.

To evaluate the actions the Division was taking to ensure the stability of foster care placements, auditors interviewed division staff, including policy and computer system staff. Additionally, auditors reviewed research articles to identify behavioral and situational factors that lead to foster care placement disruptions and impacts on foster children. Likewise, auditors interviewed representatives from Alabama's, Delaware's, and New Mexico's departments that provide foster care services to identify best practices regarding foster parent communication and placement stability. These states were selected because the federal Child and Family Service Review found that they were doing a good job of ensuring that foster children's placements were stable.

Auditors interviewed 26 foster parents from across Arizona.

To evaluate the adequacy of mechanisms used to communicate with foster parents, auditors conducted telephone interviews with 26 foster parents throughout the State. Additionally, auditors observed a foster care provider meeting and foster parent support group and orientation meetings to gain first-hand understanding of the foster care placement process, foster parent issues, and information presented to foster parents. Likewise, auditors interviewed administrative and field staff from the Department's Office of Licensing, Certification, and Regulation; representatives from licensing agencies; and the Department's Family Advocacy Office to obtain information about the licensing of foster homes and foster parents' concerns. Additionally, auditors reviewed Family Advocacy Office telephone call logs and grievance forms to identify past complaints from foster parents.

This audit was conducted in accordance with government auditing standards.

The Auditor General and staff express appreciation to the acting director and staff of the Department of Economic Security for their cooperation and assistance during the audit.

FINDING 1

Foster care placement stability can be improved

The Division should continue its efforts to ensure that foster care placements are stable. Research indicates that there are significant negative impacts for foster children when they are moved between numerous placements. However, in 2001, the federal government found that Arizona did not meet the national standard for placement stability. Although the Division is already taking steps to improve placement stability, it should consider additional enhancements and innovative practices.

Placement changes negatively impact foster children

Numerous studies and researchers report that children are adversely affected by placement disruptions and unnecessary moves while in out-of-home care. For example, a policy statement from the American Academy of Pediatrics indicates that children who have experienced abuse or neglect have an elevated need for permanency, security, and a constant emotional attachment.¹ Another study reveals that multiple placements produce unstable relationships that can negatively affect children's ability to form attachments to significant others.² Similarly, others report that children can face mental health issues, such as low self-esteem, distrust of others, mood disorders including depression and anxiety, social and moral immaturity, and cognitive and language delays.^{3,4}

Abused and neglected children have an elevated need for permanency, security, and a constant emotional attachment.

¹ American Academy of Pediatrics—Committee on Early Childhood, Adoption, and Dependent Care. *Developmental Issues for Young Children in Foster Care*. Pediatrics, Vol. 106, No. 5. November 2000. 1145-1150.

² Usher, Charles, Karen Randolph, and Harlene Gogan. *Placement Patterns in Foster Care*. Social Service Review, March 1999. 22-36.

³ Wulczyn, Fred, Joseph Kogan, and Brenda Jones Harden. *Placement Stability and Movement Trajectories*. Provided by the Child Welfare League of America.

⁴ Bradbard, Jacquelyn J. *Children's Adjustment to Foster Care Placement: Perceptions of Foster Parents and Former Foster Youth*. A thesis presented to the Department of Social Work, California State University, Long Beach. May 2000.

A child may be moved to be placed with siblings or with relatives.

Despite the importance of stable placements, foster children in Arizona may be moved for a variety of reasons. In some instances, a placement change may be made so that a child can be reunited with his or her siblings in a different foster care placement or to live with relatives in a kinship care arrangement. At other times, a placement interruption may occur as a child is transitioned to a less restrictive setting, such as movement from a residential treatment center to a family foster home. Other reasons for placement interruption can include child safety concerns, inappropriate initial matching of a child and provider, and problems between the foster parent and foster child.

Arizona did not meet federal placement stability standards

The federal government has established standards for placement stability and regulates and monitors states' efforts to ensure placement stability through the use of two evaluation tools: state data submissions and onsite file reviews. The most recent review of Arizona, based on 1999 data and a file review in September 2001, found that the State did not meet the standards for foster care placement stability.

States provide federal government with placement stability data—The federal Department of Health and Human Services (DHHS) requires states to submit key child welfare and child protection program data, including the number of placements foster care children experience while in care. This data must be submitted every 6 months to the federal government and is reported annually to Congress. States must count virtually all placements that occur for each foster care child, including changes to and from shelter and group home care, relative or kinship care, residential treatment, and family foster care. Changes that would not be counted include trial home visits and temporary respite visits.

DHHS uses the data it receives to assess how well states are doing by comparing the data to the national standards it established for placement stability. The national standard for placement stability was set at the 75th-percentile of all state performance in the area of foster care placement stability and requires that 86.7 percent or more of each state's foster care children who have been in care for less than 1 year have no more than two placements. According to the 1999 federal fiscal year data Arizona was required to submit for the federal Child and Family Services Review (CFSR) conducted in 2001, about 82 percent of Arizona's foster children in care for less than 1 year have met this criterion.

Federal government conducts onsite file reviews—In addition to reviewing data, DHHS also evaluates how well states are doing to provide placement stability for foster children and other performance measures by reviewing foster children's files as a part of its CFSR. Unlike the data analysis, which simply considers the total

number of children's placement changes regardless of reason, the file review allows DHHS to examine individual cases and determine whether specific placement changes are necessary to achieve and are consistent with the child's case plan. For example, if a file demonstrates that a child moved from a mental health facility to a family foster home because the child's mental health sufficiently improved, the move would be considered consistent with the case plan and DHHS would consider it appropriate. DHHS requires that at least 90 percent of the cases its reviewers examine demonstrate that children were in stable placements, unless the moves were consistent with the child's case plan objectives. The 2001 Child and Family Services onsite review of case files found that only 71 percent (22 of 31) of Arizona's foster care cases met this standard.

Like Arizona, most states have not yet met the national standard for placement stability. For example, only 4 of the 31 states that had completed a CFSR in 2001 and 2002 had placement stability rated as an area of strength. Arizona was one of the 27 states rated as needing improvement.¹ When compared to the other 29 states reporting review outcomes, Arizona ranked 16th on the data submission portion and 24th for the onsite case file review.²

Like most other states, Arizona does not meet the national standards for placement stability.

Division taking steps to address stability problems

During the CFSR, both division staff and federal reviewers discovered several reasons why Arizona is not meeting the stability standards. As a result, the Division worked with DHHS to formulate a Program Improvement Plan to address identified problems, including placement stability. The Division's plan to improve stability calls for changes in three main areas:

Improvement plan addresses homes for older children, the need to properly assess children, and data problems.

- **Placement options and support for older youth**—During the CFSR process, the Division and federal reviewers determined that stability was a particular problem for older children. For example, federal reviewers found that in more than half of the cases examined where a child experienced multiple placements, the child was between the ages of 11 and 15. As a result, the program improvement plan calls for the Division to improve the availability of foster homes able to provide stability to older children. Increasing the number of homes available for these children, who can be difficult to place, may increase the likelihood they can be matched to a home that can ideally meet their needs and thus stay in the home for a longer period of time. Contractors in District I that recruit and monitor foster care homes are now required to develop and show specific recruitment plans for homes that accept older children, sibling groups, and children from diverse ethnic groups.

¹ Alabama, Delaware, New Mexico, and Oregon were the four states that had the placement stability portion of their CFSR rated a "strength." A total of 32 states participated in these reviews in 2001 and 2002, but Wyoming's results were not released at the time of this report.

² No data submission outcome was reported in the CFSR final reports for New York and West Virginia, and no onsite file review outcome was reported for Arkansas and Kansas in their final reports. As a result, the state rankings for both placement stability indicators were based upon the reported outcome for 29 of the 31 states that participated in CFSRs in 2001 and 2002.

Additional guidance provided on how to assess children's safety, developmental progress, and adjustment to the placement.

- **Identification of foster placement needs and planning**—Federal reviewers also found that there was a need to prepare and support foster families to meet the needs of children, noting that the primary reason for placement disruption was inadequate preparation and support of foster parents. For example, reviewers noted that some children were moved for relatively minor behavioral infractions. Therefore, the program improvement plan directs the Division to improve the identification of needs for both foster children and out-of-home care providers and of services to address those needs. Also noted in the plan is a step to increase child-specific planning during placement transitions to ensure stability in the next placement.

In response, the Division has revised its case planning and case management policies to place a greater emphasis on evaluating and providing for children's needs, thereby increasing the likelihood that the child will be placed in the most appropriate setting possible and that he or she will succeed in care. For example, an exhibit that was added to the Division's policy manual provides guidance to case managers on what questions to ask during visits with the child and provider to help them assess foster child safety and developmental progress, adjustment to the placement, and the suitability of the child's and provider's services. Additionally, the Division revised its policy to require that services the out-of-home caregiver will need to adequately care for the child be included in the child's Out-of-Home Care Plan. Similarly, the Division has modified its core training for unit supervisors to include information on identifying children's needs and monitoring case managers' efforts to assess and meet them.

- **Accuracy of foster care placement stability data**—In the state-wide assessment portion of the CFSR, the Division identified problems with the way the placement stability data was extracted and counted. According to the Division, these problems led to some over-counting of placement changes. The Division has worked to improve the accuracy of the regular data submissions to the federal government since 2001. For example, the Division selected a sample of cases and followed up to ensure the system was accurately counting each child's placements and that placements were accurately recorded. Similarly, it improved its procedures for counting placements and enhanced its computer programming to detect some potential data entry errors. Arizona's placement stability data provided to the federal government for federal fiscal year 2001 indicates that Arizona had moved from 81.9 percent in 1999 to 82.9 percent in 2001.

Areas for further improvement

In addition to continuing to implement the planned improvements mentioned above, the Division can improve foster care stability by enhancing existing procedures and foster parent support mechanisms, and considering the potential costs and benefits of innovative practices used by better-performing states.

Enhance existing procedures or mechanisms—First, the Division should revise its policies regarding case manager visits with foster children to only rarely allow substitute visitations. Current division policy requires case managers to meet face-to-face with foster children at least once per month.¹ However, the policy also allows case managers to rely on other division staff, such as human service workers, and other professional service providers, such as counselors, to fulfill this requirement. According to the Division, this policy exists in part because of workload issues. However, the Division recognizes the case manager is in the best position to identify and address problems that arise in foster homes and provide supplemental support before a child in placement reaches a crisis and must be moved. While other division staff and service providers can ensure the child's safety, their contact with the child serves different purposes, such as providing transportation or medical services, and does not necessarily identify potential problems in the foster home that could eventually result in a placement change.

In contrast, Alabama and Delaware, both states found to be doing well in the area of placement stability, rarely if ever allow substitute visitation. Additionally, DHHS analysis of outcomes for states participating in the CFSR in 2002 found significant relationships between case manager visits with children and achievement of reunification, involvement of children and parents in case planning, and in meeting the children's educational, physical, and mental health needs. Therefore, the Division should clarify its policy to ensure that substitutes be used only under rare circumstances.

Second, the Division should increase its support for foster parents. As discussed in Finding 2 (pages 17 through 25), foster parents would benefit from additional support mechanisms, which can also impact placement stability. For example, Delaware reports improving its placement stability by organizing groups of foster homes into small, geographically based clusters that allow for sharing of best practices, provision of respite care, and additional support among foster parents. Additionally, New Mexico's child welfare system utilizes foster parents who contract with the state to liaison with other foster parents, or identifies experienced foster parents to act as mentors, and has active state and county foster parent associations. New Mexico's child welfare administration notes that foster parents credit the liaisons with improving placement stability, adding that state and county foster parent

The Division should only rarely allow substitutes for required monthly case manager visits with foster children.

¹ Division policy indicates that, for certain placements such as emergency shelter and receiving home care, case managers are supposed to have face-to-face contact with the child and provider every 2 weeks. Shelter care and receiving homes are often the initial placements for children entering foster care and are considered short-term placements.

Arizona has a unique opportunity to consider adopting innovative ideas.

associations work together to furnish foster parents with information and training, and provide general support.

Finally, the Division can use its existing peer review process to ensure that these and other policy changes are having the desired effect of increasing placement stability. As a part of the peer review process, division staff review a sample of cases involving children under the Division's jurisdiction on a quarterly basis. Consistent with the federal CFSR procedures, the Division can use this peer review to ensure that the new practices and policies are properly implemented and that placement stability is increasing.

Consider whether innovative practices would be beneficial—In addition to improving existing procedures, the Division should evaluate the benefits of adopting innovative practices used by other states to increase placement stability. Because Arizona is currently considering the future of its child protective service function through such initiatives as the Governor's Advisory Commission on Child Protective Services Reform, there is a unique opportunity to consider options that may not be feasible under existing operations and resources. Although these practices might require additional resources, the Division should consider whether any potential benefits justify the possible costs. For example, the Division should consider the feasibility of:

- **Allowing foster parents to care for only one sibling group at a time**—Alabama currently uses this practice for therapeutic foster homes and places children from only one family in each therapeutic foster home, rather than mixing children from different families.¹ As a result, foster parents' burden can be minimized by focusing on the needs of just one family and working with only one CPS case manager. Although Alabama uses this practice for therapeutic foster homes, the Division should consider the feasibility of using this practice in general family foster care settings because the benefits to foster care children and foster parents might outweigh any additional resource needs, such as the need to recruit and retain a larger number of foster families. The Division reports that between October 2002 and March 2003, 283 foster homes were licensed, while 196 homes exited the foster care system. Additionally, the most frequently cited reason foster parents reported for exiting the system was because they had adopted a foster child. The Division also indicated that they are trying to increase the number of placements able to provide care for siblings but that more resources are needed, including more homes of the right type, number, and location.
- **Decreasing use of shelter care**—Some other states' experiences suggest that the Division should consider decreasing its reliance on shelter care placements. Arizona foster children may be initially placed in a shelter setting, during which time their needs are assessed, and then they are moved to a family foster home or other appropriate setting. This virtually ensures that these children must be

¹ Therapeutic foster homes typically provide more intensive treatment services for children with greater mental health or behavioral management needs.

moved at least once. In contrast, New Mexico and Alabama immediately place children in foster care and then conduct an assessment of their needs. Only those children who are found to need more intensive services than can be provided in a family foster care home must be subsequently moved.

Recommendations

1. The Division should continue to implement its federally mandated Program Improvement Plan, including increasing the number of homes available for older and other difficult to place youth, better preparing and supporting foster families, continuing to work to improve the accuracy of foster care data, and continuing other efforts to improve placement stability.
2. The Division should revise its policy to clarify that substitutes be allowed to replace case managers in the required monthly face-to-face visits with foster children only under rare circumstances.
3. The Division should use its peer review process to ensure that policy changes are having the desired effect of increasing placement stability.
4. As Arizona considers the future of child protective services, the Division should evaluate the benefits of adopting innovative practices other states used to increase placement stability, such as single family-group placements and a decreased use of shelter care.

FINDING 2

Foster parents report good communication, but improvements can be made

Although there are several good mechanisms for foster parents to receive and provide information about the children in their care, additional steps can be taken to improve communication. Foster parents report that several communication mechanisms provide them with helpful information and allow them to actively participate in their foster children's cases, such as case manager visits and Foster Care Review Board hearings. However, foster parents report that they would also benefit from improved information about the children in their care and believe CPS withholds some information. Additionally, the Division can improve communication by enhancing its foster parent survey mechanism, support groups, and Web site.

Good support and communication important to foster parents

This audit was approved by the Joint Legislative Audit Committee, in part, as a response to some foster parents' concerns raised to the Legislature about their ability to provide input about the children they were fostering. Research indicates that to successfully care for children, foster parents need to have adequate information about the children in their care, including knowledge of case plans and medical and behavioral information. For example, one research article indicates that foster parents need the support of the child welfare agency and a network of other foster parents who can serve as mentors, and foster parents need the opportunity to provide feedback to the agency without fear of reprisal.¹ In addition, another research article indicates that some foster parents resign because of poor agency support, case worker communication, and services, or because of the many stresses associated

Research suggests that good communication helps retain foster parents.

¹ Christian, Steve. *Supporting and Retaining Foster Parents*. National Conference of State Legislatures, State Legislative Report. 27:11: April 2002.

with caring for foster children such as a lack of respite care,¹ the children's difficult behavior, and interactions with birth parents.²

Some communication practices helpful

There are several communication mechanisms that provide foster parents with information and allow them to actively participate in their foster children's cases. Auditor analysis of 26 foster parent interviews found that some communication processes are beneficial.

Case manager visits useful—CPS case manager visits help foster parents to receive and provide information about children in their care. Division policy requires CPS case managers to have face-to-face contact with foster children and foster parents monthly. These visits must occur specifically with the child and caregiver together in the caregiver's home at least once every 3 months. Case managers use the visits to assess the safety and progress of the child, the adjustment of the child and foster parent to each other, and the adequacy of the services and supports provided to both the child and the foster parents. According to the Division, 68 percent of the required monthly visits were completed during March 2003.³

More than half of the foster parents interviewed reported that case manager visits provided useful communication opportunities. For example, of the 26 foster parents interviewed, 15 reported that they see the case manager regularly and are able to ask questions, or request things that they or the child need during the visits. Eighteen foster parents said that they also have contact with case managers by telephone. In addition, seven foster parents said that each case manager is different and some will share more information than others.

Licensing agency specialist visits helpful—Similarly, licensing agency specialist visits often enable foster parents to provide and receive information about the children in their care. The licensing agencies that contract with the Division to recruit, train, and monitor foster parent homes require their own specialists to periodically visit the homes.⁴ The Division reports that 91 percent of the foster homes

CPS case manager visits help foster parents.

¹ Respite care is the provision of short-term care for a foster child to temporarily relieve a foster parent from the duty of caring for him or her.

² Rhodes, Kathryn, et al. "A Comparison of Family Foster Parents Who Quit, Consider Quitting, and Plan to Continue Fostering," *Social Services Review*, March 2001.

³ *Child Welfare Reporting Requirements Semi-Annual Report for the Period of October 1, 2002 through March 31, 2003*. The Division reports that it has verified that more than the reported number of children received the required visit. However, it is unable to compile and tabulate this information because of how it is stored in the Division's database.

⁴ In some parts of the State, the Division contracts with private agencies for foster parent recruitment, training, monitoring, and retention. In other parts of the State, the Department's Office of Licensing, Certification, and Regulation performs some of these functions, including monitoring through licensing case manager visits.

that required a licensing specialist to visit between January 2003 and March 2003 were visited as required.¹

Thirteen foster parents reported that the visits from licensing specialists provide an opportunity for them to ask questions and to talk about how the children are doing. Eighteen said that licensing specialists are responsive to their concerns and help them if they need something. In addition to home visits, eight foster parents reported having telephone contact with licensing specialists.

Foster parents participate in Foster Care Review Board hearings—

Foster parents auditors interviewed attend and speak at Foster Care Review Board hearings. The Board is required to review all cases where a child is in an out-of-home placement within 6 months of the child's removal and every 6 months thereafter.² These hearings are held so that the Board can review the efforts that have been made to carry out the case plan. Twenty-three of the foster parents auditors spoke with reported that they attend Foster Care Review Board hearings, they can speak openly about the children's needs, and their input is positively received.

Most foster parents interviewed reported positive experiences with the Foster Care Review Board.

Newsletter provides valuable information—The Division collaborates with a vendor to publish a bimonthly newsletter for foster parents. Auditors reviewed several issues of the newsletter and found that it regularly contains useful information such as articles on child development, back-to-school advice, and safety reminders. Eighteen foster parents auditors interviewed reported that they receive the newsletter and find it to be somewhat interesting and useful.

Newsletter published for foster parents is useful.

Some communication mechanisms need improvement

Some foster parent input mechanisms were identified by foster parents or federal reviewers as needing improvement.

Evaluate information provided to foster parents—The majority of foster parents auditors interviewed report that the information CPS provides to them about children in their care is not sufficient and they believe CPS withholds some information from them. Division policy requires that the CPS case manager provide each foster parent with a foster child placement packet within 5 days of placement. The packet contains a series of forms with medical, educational, and behavioral information about the child. Foster parents are responsible for completing and updating some of the forms in the packet. For example, foster parents are responsible for updating a form about the child's personal habits such as what they like to eat, when they go to bed, etc. All of this information is important because it helps ensure foster parents can adequately care for the children placed with them

¹ *Child Welfare Reporting Requirements Semi-Annual Report for the Period of October 1, 2002 through March 31, 2003.* Due to a lack of automation in reporting foster home visits, the Division believes that this number does not reflect all of the foster homes that received the required visitation.

² A.R.S. §8-515.03, Duties of local foster care review boards.

The majority of foster parents interviewed believe CPS had withheld known information about their foster children.

and provides information to other foster parents if the child moves to a new placement.

The majority of foster parents auditors interviewed reported that they receive placement packets, but the packets do not contain enough information. Six foster parents reported that they understood the Division may not always know much about the children and, therefore, cannot provide them with needed information. However, 16 of the 26 foster parents interviewed said that they believed CPS had withheld known medical or behavioral information. For example:

- One foster parent reported that a premature baby who was placed with her when the baby was about 6 weeks old had a virus, but the child's placement packet contained no medical information.
- Another foster parent said that an 11-year-old child who had been in foster care since the age of 3 was placed in her home, but she was not told that the child had been in foster care for that long nor were the child's behavioral problems explained. This lack of information caused the child to be removed from the foster home.
- Another foster parent said that the placement packets she receives are "absolutely not adequate." For example, she received two children late in the summer of 2002 who had been originally removed from their home in early 2002 and the packets she received with the children were empty. Both children exhibited extreme sexual behavior for their age and the foster parent indicated she was not told about these issues.

Division officials indicated that policy and practice promotes and requires that all information pertinent to the care of the child must be shared with caregivers, but in some instances the case managers may be newly assigned to the case and may not know the information. The Division also indicated that there may be other factors contributing to foster parents' perception that information is withheld, such as some packets containing too much information or the information in the packet not being presented in terms that the foster parent can easily understand. For example, a completed, up-to-date packet of a child who has been in foster care for an extended period of time could include more than an inch-thick file of documents. Foster parents might find it difficult to identify critical information. However, division officials agreed that they could form a work group to review what type of information should be contained in the placement packet and how best to ensure that information is provided in a timely manner and updated regularly. The Division should include foster parents in this work group.

Improve information foster parents receive about Juvenile Court hearings—Foster parents are not always notified about or allowed to speak in

Juvenile Court hearings. When a child is removed, numerous Juvenile Court hearings are held to affirm the case plan goals, determine progress toward those goals, and make decisions on the case, such as whether a child should be returned home or parental rights should be terminated. Most foster parents auditors interviewed reported that they attend court hearings. Eleven mentioned that the court allows them to testify, while seven said that they are invited by the court just to observe. However, three foster parents reported that they do not receive notice that the hearings are occurring and two said CPS had discouraged them from attending. While foster parents should be receiving notice of hearings from the court, if a foster child is moved to a new placement or a foster parent moves after a hearing has been set, the notice may have gone to the previous foster parent or old address. However, the Division could address this issue by ensuring that the placement packets contain information on upcoming hearings and ensuring through case manager visits and training that foster parents are informed of their right to attend court hearings.

Most foster parents interviewed reported that they attend court hearings.

Ensure foster parents are aware of appeal and grievance processes—Although the Division provides some information to foster parents about their right to appeal certain CPS decisions, additional steps can be taken to ensure that foster parents are adequately informed of available options. State law or division policy provides three appeal/grievance processes:

- The Family Advocacy Office, which foster parents can use to make an informal complaint or inquiry about individual cases that involve the child welfare system. For example, a foster parent might report that he or she is experiencing communication problems with the foster child's case manager. The Family Advocate would help by contacting the case manager or the case manager's supervisor to facilitate improved communication.¹
- The client complaint/grievance process, which foster parents can use to file a formal grievance with the Division. For example, a foster parent might file a formal grievance because she had ongoing concerns about a child's case manager that had not been resolved through less formal mechanisms.
- The foster parent child removal appeal process, which foster parents can use to appeal the planned removal of a foster child from their home when he/she will be placed into another family foster home, unless the move is due to specific circumstances, such as safety and risk of harm concerns or to reunite the child with siblings or relatives.²

Almost all of the foster parents auditors interviewed reported that they were unaware of at least one of these mechanisms. The Division can do more to provide information on these mechanisms, such as making sure that they are well covered in the training foster parents receive when renewing their license and adding information about these processes to its Web site.

Some foster parents are unaware of available appeal and grievance processes.

¹ A.R.S. §8-828, Family Advocacy Office; duties; program termination.

² A.R.S. §8-515.05, Removal of child from foster parent's home; requirements; notification; review.

Foster parents reported they would like more detailed training about how to handle medical and behavioral issues.

Standardize and improve foster parent training—The Division can take additional steps to ensure that training provided to foster parents is consistent and contains more practical information on handling health and behavioral problems. Foster parents receive training before they are licensed and on an annual, ongoing basis from either a private agency that contracts with the Division to recruit, train, and monitor foster parent homes, or from the Department's Office of Licensing, Certification, and Regulation.

The 2001 CFSR process identified a need for the Division to develop a process to monitor the consistency and quality of training for foster parents. As a result, the Division has contacted the licensing agencies throughout the State to gather information about their individual foster parent training curricula, and has held an initial meeting with them to discuss standardizing the foster parent training.

As the Division revises the foster parent training, it should continue to seek foster parent input about what their training needs are and how those needs can best be met. For example, six foster parents auditors interviewed indicated that they would like to have other foster parents teach and share their experiences in training classes. Likewise, eight foster parents reported that they would like to have more detailed training about how to handle medical and behavioral issues.

Three additional improvements suggested by other states' review

A review of best practices and the activities of other states suggest that the Division should systematically solicit foster parent feedback, increase its support mechanisms for foster parents, and improve its Internet resources.

Solicit additional foster parent feedback—Although the Division already solicits some feedback from foster parents, a more comprehensive mechanism should be established. The Division has three mechanisms for soliciting foster parent input, including a foster parent wrap-up form, which foster parents complete when a child is removed from their home; a customer satisfaction survey, which is sent to 1,000 clients and providers, including foster parents, every month; and a foster parent survey, which mainly focuses on foster parent recruiting practices. However, none of these mechanisms solicits foster parents' impressions of the foster care system as a whole and uses that information to make changes that are important to foster parents.

The Division should improve one of its three survey mechanisms or try some other method to ensure foster parents can regularly provide meaningful input. For example, South Dakota reports that it hopes to increase its understanding of foster families' experiences and concerns by improving its monthly reporting mechanism.

South Dakota found that, in part, poor retention of foster parents was due to a lack of meaningful and ongoing dialogue between agency personnel and foster families. Therefore, foster families will complete an improved monthly report to the agency that provides information about the child's well-being, the stressors on the family, and the foster parents' perceptions of the placement's stability. Staff will be trained on how to respond to the needs expressed in the reports.

Strengthen foster parent support groups, mentoring, and respite

systems—The Division can help strengthen Arizona's foster parent support/mentoring network by collaborating with its licensing agencies to establish a more comprehensive system of support groups, mentoring, and respite care systems. According to the National Foster Parent Association, Arizona is one of only a few states that do not have a state-wide foster parent association. While some of the licensing agencies sponsor local foster parent support groups, state-wide foster parent associations can provide important supports to local foster parent groups and often sponsor activities, conferences, and training events that foster parents can take advantage of. In addition, there are some portions of Arizona where foster parents do not have access to any local foster parent support groups. For example, in District 5, which includes Pinal and Gila Counties, foster homes are licensed by the Department's Office of Licensing, Certification, and Regulation, which does not sponsor a foster parent support group. Similarly, some parts of other districts are not served by a foster parent support group. Strong support groups or mentoring systems are important because nine of the foster parents auditors interviewed noted that they rely on information and support from other foster parents. In addition, four of the foster parents auditors interviewed reported that there is a need to improve their access to respite care, which can be facilitated through local support groups.

Some parts of Arizona do not have foster parent support groups.

States such as Alabama and Delaware have implemented strong, active state and local foster parent associations or mentoring systems. For example, Delaware groups foster parent homes into geographic clusters of 12 foster homes. Unlike Arizona, these clusters are available throughout the state and are financially supported by the state agency. Specifically, the agency pays a monthly stipend of \$100 to one foster family in the cluster that organizes a foster parent support network with the other homes in the cluster. In addition to providing a venue for foster parents to share information and support each other, these cluster groups are used to facilitate respite care for foster families. Additionally, the state agency employs staff dedicated to assist these cluster groups. Similarly, Alabama has county, regional, and state foster parent associations. Alabama's regional groups offer trainings and CPR classes, and work with area food banks to provide low-cost food to foster parents.

Improve Division's Web site

—The Division should also update its Web site to include a special section that would be useful to Arizona foster parents. Currently, there are no specific portions of the Division's Web site that are devoted solely to providing information and support to foster parents. Auditors reviewed child welfare

The Division's Web site could contain information useful for foster parents.

agencies' Web sites from five other states that contain information pertaining to foster parents. For example:

- Arkansas' Division of Children and Family Services Web site contains information about the responsibilities of foster families and links to other useful sites on the Web that provide information useful to foster parents;
- Colorado's Department of Human Services Web site has links to foster parent associations, as well as lists of books, magazines, and online resources;
- Illinois' Department of Children and Family Services Web site contains links to its policy manual and the state's administrative rules concerning foster care, as well as handbooks and other information about foster parenting;
- Iowa's Department of Human Services Web site has information about training opportunities, medical insurance, support groups, and respite care services; and
- Vermont's Social and Rehabilitative Services Web site contains department policy information pertaining to foster parenting as well as a link to the Vermont Foster Parent Association. The Association's Web site has information about foster parent licensing, available training classes, and links to local foster parent support groups.

Recommendations

1. The Division should ensure that case managers provide all known medical and behavioral information about the child to the foster parents. To do so, the Division should form a work group, including foster parents, to review the type of information that should be contained in the placement packet and how best to ensure the information is provided in a timely manner and updated regularly.
2. The Division should ensure that foster parents are aware of their right to attend court hearings by informing them during case manager visits and ensuring this information is covered in foster parent training.
3. The Division should ensure that foster parents receive adequate information about its complaint/grievance processes including the Family Advocacy Office, the client complaint/grievance process, and foster child removal appeal process through means such as foster parent training or information provided on the Division's Web site.
4. The Division should continue its plans to improve foster parent training. When improving the training, the Division should continue to seek input from foster parents about what their training needs are and how those needs can best be met.
5. The Division should enhance an existing survey mechanism or implement a new one to solicit more comprehensive input from foster parents.
6. The Division should ensure that all foster parents in Arizona have an opportunity to participate in support groups, mentoring, and respite care systems by organizing foster homes into clusters, or developing another method.
7. The Division should update its Web site to include information that would be useful to Arizona foster parents, such as links to pertinent portions of the Division's policy manual, state statutes, administrative rules, and information about foster parent support groups and training classes.

AGENCY RESPONSE



ARIZONA DEPARTMENT OF ECONOMIC SECURITY

1717 W. Jefferson - P.O. Box 6123 - Phoenix, AZ 85005

Janet Napolitano
Governor

Mary Gill
Acting Director

July 18, 2003

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

Dear Ms. Davenport:

Thank you for the opportunity to provide comments on the evaluation of the Department's foster care services as related to foster care placement stability and foster parent communication. We concur with the recommendations made by your office, and will begin our implementation of the recommendations using current resources.

Our Department is very committed to the children of Arizona, especially those children who cannot safely remain in their own homes and require foster care placement. These children and their foster parents deserve our greatest attention. We must assure that the services we provide to foster children and foster parents are the services that will best meet their needs. Foster parents are viewed as an essential part of a child's service team. Open communication between Department staff and foster parents is needed for foster care placement stability and the successful achievement of permanency for children in out of home care.

As described in our enclosed response, improving foster care placement stability and enhancing our relationship with the foster parent community will remain a high priority for our Department. These efforts are also consistent with recommendations made by the Governor's Advisory Commission on Child Protective Services and the federal Child and Family Services Review.

Full implementation of the recommendations made by your office will require the Department to devote additional resources. This comes at a time of extreme budget reductions. Nevertheless, because of our commitment to the children, the children's families, and the children's foster parents, the Department plans on implementing the recommendations.

Please feel free to call me at (602) 542-5678, or Mary Lou Q. Hanley, Assistant Director for the Division of Children, Youth and Families at (602) 542-3598 if additional information is needed.

Sincerely,

Mary Gill
Acting Director

Enclosure

**DEPARTMENT OF ECONOMIC SECURITY'S RESPONSE
to the
AUDITOR GENERAL'S RECOMMENDATIONS
for
FOSTER CARE PLACEMENT STABILITY and FOSTER PARENT COMMUNICATION**

The Office of the Auditor General's evaluation of the Department's efforts to ensure that foster care placements are stable and that communication mechanisms with and from foster parents are effective includes two findings with eleven recommendations. Four of the recommendations pertain to foster care placement stability. Seven recommendations pertain to foster parent communication. The Department of Economic Security is pleased to provide the following comments regarding these recommendations.

The Department's Division of Children, Youth and Families administers the Child Protective Services Program, and is referred to as "the Division" in this response.

FINDING 1: FOSTER CARE PLACEMENT STABILITY CAN BE IMPROVED.

Recommendation 1:

The Division should continue to implement its federally mandated Program Improvement Plan, including increasing the number of homes available for older and other difficult to place youth, better preparing and supporting foster families, continuing to work to improve the accuracy of foster care data, and continuing efforts to improve placement stability.

DES Response:

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

The Division is pleased to report several efforts that are currently underway or planned for the future. The Division plans to:

- increase the number of homes available for older and other difficult to place youth;
- better prepare and support foster families;
- continue to work to improve the accuracy of foster care data; and,
- continue efforts to improve placement stability.

First, the Division's efforts to increase the number of foster homes available for older children include:

- specific outcome-based incentives are included within the foster home recruitment, study and supervision (HRSS) contracts with private agencies for increasing and maintaining the placement of older children; and
- incentives are included in specific HRSS contracts in Maricopa County for developing and implementing targeted recruitment plans for older children, sibling groups, and other difficult to place children.

The outcomes of these contract tasks and provisions will continue to be assessed during the next year to determine their effectiveness.

The Division's Recruitment Plan includes general, targeted, and child specific goals and objectives that, as a whole, are designed to increase the number of foster and adoptive homes available for all ages of children, including children with specialized needs. This statewide Division-driven Plan is implemented, in part, through contracts with private agencies.

One of the most significant resources to enhance communication of the Division's need for foster and adoptive homes for children is the Arizona Foster Care and Adoption Coalition (AFCAC). AFCAC is chaired by the Division and includes statewide representation from the private agencies responsible for recruiting foster and adoption homes for the Division. This year, AFCAC developed the following Mission Statement: "The Arizona Foster Care and Adoption Coalition is a statewide collaboration that increases public awareness of children in the child welfare system through education and training. By capitalizing on Arizona resources and maximizing communication, the Arizona Foster Care and Adoption Coalition supports system changes to improve recruitment and retention of families for children". AFCAC consistently requests the active participation of foster and adoptive parents at meetings.

The statewide toll-free information line *1-877-KIDS NEEDU* is one of the Division's links to the public for disseminating information about foster and adoptive parenting. Information on the toll-free information line is also made available on the Division's Website, posters, brochures, bookmarks, magnets, license plate frames, and other recruitment promotional materials. Recently, this telephone line was expanded to provide information in Spanish.

To better prepare and support foster parents, the Division has intensified its collaboration with the behavioral health system. In-service training opportunities for foster parents at conferences will include more sessions related to the mental and behavioral health needs of children and effective strategies to meet the children's needs, including supports needed by the care giving family.

The Division is currently pursuing the use of a standardized, nationally-recognized foster and adoptive parent training curricula for statewide use. Within the next thirty days, the Division anticipates reviewing two nationally-recognized training packages.

Recently, discussions within the foster parent community have focused on the need for a foster parent association in Arizona. An initial meeting to discuss the feasibility of forming a foster

parent association is being scheduled for late August 2003. Information regarding the meeting will be disseminated through AFCAC, other contract agencies, and through the *Arizona Statewide*, a newsletter for foster and adoptive parents. Additional local support resources can also be provided to foster families through their foster home agencies.

The Division continues efforts in improving the accuracy of foster care data. The Division is using a quarterly Peer Record Review process to thoroughly review case-specific data from a randomly-selected sample of child protective service cases. Foster placement stability is one of the areas examined during the Peer Record Review process.

Recommendation 2:

The Division should revise its policy to clarify that substitutes be allowed to replace case managers in the required monthly face-to-face visits with foster children only under rare circumstances.

DES Response:

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

The Division will modify policies and procedures regarding case manager's face-to-face contact with foster children to clarify the rare circumstances in which face-to-face contact between the child and another child welfare professional is permissible.

The Division will use the Peer Review Process to monitor compliance with the revised policy.

Recommendation 3

The Division should use its peer review process to ensure that policy changes are having the desired effect of increasing placement stability.

DES Response:

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

As previously stated, the Division is pleased to report that the use of the Peer Review Process is fully operational on a statewide basis. The Division will continue to enhance the Peer Review Process to ensure that policy and practices related to stable foster care placements are effective.

Recommendation 4:

As Arizona considers the future of child protective services, the Division should evaluate the benefits of adopting innovative practices other states used to increase placement stability, such as single family-group placements and a decreased use of shelter care.

DES Response:

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

The Division will consider the options in the Report as methods for improving placement stability. The Division will explore innovative practice options, such as foster homes that provide care for only one sibling group at a time and increased use of “emergency receiving” foster care services in family foster homes. Since these options impact both licensing procedures and contract agency tasks, coordination with the Department’s Office of Licensing, Certification and Regulation (OLCR) and the private foster home agencies is required when considering these options.

FINDING 2: FOSTER PARENTS REPORT GOOD COMMUNICATION, BUT IMPROVEMENTS CAN BE MADE.

Recommendation 1:

The Division should ensure that case managers provide all known medical and behavioral information about the child to the foster parents. To do so, the Division should form a work group, including foster parents, to review the type of information that should be contained in the placement packet and how best to ensure the information is provided in a timely manner and updated regularly.

DES Response:

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

The Division has started a review of the methods used by case managers for providing children’s medical and behavioral health information to foster caregivers. A workgroup of case managers has been formed to make recommendations regarding improving the “Child Placement Packet” process. The Division will also use the Peer Review Process to monitor compliance with the Placement Packet process. In addition, the Division will actively request the input of foster parents in the development of recommendations for improving the Child Placement Packet process. It is essential that the most efficient and effective methods for sharing information about foster children with caretakers be expeditiously implemented.

Recommendation 2:

The Division should ensure that foster parents are aware of their right to attend court hearings by informing them during case manager visits and ensuring this information is covered in foster parent training.

DES Response:

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

The Division will implement this recommendation through basic and advanced foster parent training. The Division will also explore ways to expeditiously update information, such as changes in foster parent's addresses, in applicable forms. This will improve the Court's ability to send official notice of court hearings to foster parents.

Recommendation 3:

The Division should ensure that foster parents receiving adequate information about its complaint/grievance processes including the Family Advocacy Office, the client complaint/grievance process, and the foster child removal appeal process through means such as foster parent training or information provided on the Division's Web site.

DES Response:

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

The Division will include information about the complaint/grievance process, including the Family Advocacy Office and the foster child removal "appeal" process, on the Department's Web site. This will better assure that foster parents will have access to this information. In addition, the Division will consider other opportunities to provide this information to foster parents, such as including the information in foster parent training and the Arizona Foster Home Handbook. The information will also be made available in alternate formats and languages, upon request.

Recommendation 4:

The Division should continue its plans to improve foster parent training. When improving the training, the Division should continue to seek input from foster parents about what their training needs are and how these needs can best be met.

DES Response:

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

As previously stated, the Division is currently pursuing the use of a standardized, nationally-recognized foster and adoptive parent training curricula for statewide use. Within the next thirty days, the Division anticipates reviewing two nationally-recognized training packages. With foster parent input, a workgroup will be formed to incorporate Arizona-specific licensing requirements, Arizona-specific policy and procedures, and training requests from foster parents into the curricula purchased.

Recommendation 5:

The Division should enhance an existing survey mechanism or implement a new one to solicit more comprehensive input from foster parents.

DES Response:

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

The Division is currently reviewing the results of a “recruitment-focused” survey. The input provided from 126 surveys is being reviewed, and additional responses will be reviewed and analyzed as completed surveys are received. The Division will also begin receiving copies of foster parent surveys that are now required by the home recruitment, study, and supervision contacts. Since the survey questions are not standardized for all contract agencies, a wide variety of information can be obtained from these semi-annual surveys.

The Division will also explore other methods of receiving input from foster parents and other caregivers, including the possible use of a Web site-based feedback tool.

Recommendation 6:

The Division should ensure that all foster parents in Arizona have an opportunity to participate in support groups, mentoring, and respite care systems by organizing foster homes into clusters, or developing another method.

DES Response:

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

The Division will explore methods of offering these services to foster parents through existing resources and future modifications to foster home agency contracts.

In addition, foster parents, contract agencies, and the Division are discussing the feasibility of having a statewide foster and adoptive parent association. An association of this type will provide a new forum and voice for foster and adoptive parents to elevate their needs, concerns, issues, complaints, questions, and wishes. As previously stated, an initial organization meeting of the foster parent community is scheduled for late August 2003. The primary purpose of this meeting is to discuss options for creating a statewide foster and adoptive parent association. Contact information for foster and adoptive parents who have expressed an interest in becoming more actively involved in recruitment, retention, and training activities will be shared with the leaders of this effort.

Recommendation 7:

The Division should update its Web site to include information that would be useful to Arizona foster parents such as links to pertinent portions of the Division's policy manual, state statutes, administrative rules, and information about foster parent support groups and training classes.

DES Response:

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

The Division will actively work with the Department's Public Information Office in an effort to fully utilize the Web site as an effective way for disseminating information to the community. The Division will also discuss the use of automated links to existing resources through the Web site.

The Division will report progress on the implementation of the recommendations at six month intervals.

Performance Audit Division reports issued within the last 12 months

02-01	Arizona Works	02-11	Department of Health Services—Health Start Program
02-02	Arizona State Lottery Commission	02-12	HB2003 Children’s Behavioral Health Services Monies
02-03	Department of Economic Security—Kinship Foster Care and Kinship Care Pilot Program	02-13	Department of Health Services—Office of Long Term Care
02-04	State Parks Board—Heritage Fund	03-L1	Competitive Electric Metering, Meter Reading, and Billing and Collections
02-05	Arizona Health Care Cost Containment System—Member Services Division	03-01	Government Information Technology Agency—State-wide Technology Contracting Issues
02-06	Arizona Health Care Cost Containment System—Rate Setting Processes	03-02	Registrar of Contractors
02-07	Arizona Health Care Cost Containment System—Medical Services Contracting	03-03	Water Infrastructure Finance Authority
02-08	Arizona Health Care Cost Containment System—Quality of Care	03-04	State Board of Funeral Directors and Embalmers
02-09	Arizona Health Care Cost Containment System—Sunset Factors		
02-10	Department of Economic Security—Division of Children, Youth and Families, Child Protective Services		

Future Performance Audit Division reports

Board of Appraisal
State Board for Charter Schools