



A REPORT
TO THE
ARIZONA LEGISLATURE

Performance Audit Division

Special Report

Arizona Department of Child Safety

Department Should Adopt Common Implementation
Practices from Other Jurisdictions As It Moves Forward
with Implementing a New Differential Response System

March • 2016
Report No. 16-102



Debra K. Davenport
Auditor General

The **Auditor General** is appointed by the Joint Legislative Audit Committee, a bipartisan committee composed of five senators and five representatives. Her mission is to provide independent and impartial information and specific recommendations to improve the operations of state and local government entities. To this end, she provides financial audits and accounting services to the State and political subdivisions, investigates possible misuse of public monies, and conducts performance audits of school districts, state agencies, and the programs they administer.

The Joint Legislative Audit Committee

Representative **John Allen**, Chair

Senator **Judy Burges**, Vice Chair

Representative **Anthony Kern**

Senator **Nancy Barto**

Representative **Debbie McCune Davis**

Senator **Lupe Contreras**

Representative **Rebecca Rios**

Senator **David Farnsworth**

Representative **Kelly Townsend**

Senator **Lynne Pancrazi**

Representative **David Gowan** (*ex officio*)

Senator **Andy Biggs** (*ex officio*)

Audit Staff

Dale Chapman, Director

Jeremy Weber, Manager and Contact Person

Erica Quintana, Team Leader

Amy Kristensen

Megan Lynn

Devin Oakes

The Auditor General's reports are available at:

www.azauditor.gov

Printed copies of our reports may be requested by contacting us at:

Office of the Auditor General

2910 N. 44th Street, Suite 410 • Phoenix, AZ 85018 • (602) 553-0333



DEBRA K. DAVENPORT, CPA
AUDITOR GENERAL

STATE OF ARIZONA
OFFICE OF THE
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

March 31, 2016

Members of the Arizona Legislature

The Honorable Doug Ducey, Governor

Mr. Gregory McKay, Director
Arizona Department of Child Safety

Transmitted herewith is a report of the Auditor General, *A Special Report of the Arizona Department of Child Safety—Differential Response and Case Screening*. This report is in response to Laws 2015, Ch. 18, §6, and was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1279.03. I am also transmitting within this report a copy of the Report Highlights for this audit to provide a quick summary for your convenience.

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

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

Sincerely,

Debbie Davenport
Auditor General

Attachment

REPORT HIGHLIGHTS SPECIAL REPORT

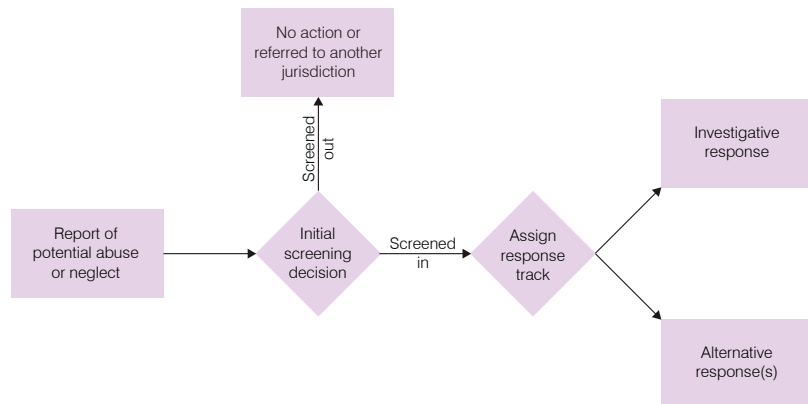
Our Conclusion

This report addresses the use of a differential response system and set screening criteria to manage reports of child abuse and neglect. A differential response system provides a method other than investigation for responding to child abuse and neglect reports through the provision of family services. Arizona used a differential response system in the past called Family Builders, but this program ended in 2004. Under legislative direction, the Arizona Department of Child Safety (Department) developed recommendations in 2015 for implementing a new differential response system in Arizona. As it moves forward with implementing the differential response system, the Department should continue working with the Legislature to develop statutory changes allowing for differential response. It should also adopt common practices other jurisdictions have used to implement their differential response systems.

Differential response systems

A differential response system provides for either (1) a traditional investigative response to a report of child abuse or neglect or (2) an alternative response that focuses on engaging families to assess needs and then connecting them with appropriate services. The alternative response track is designed for cases where there is a low and/or moderate risk of imminent danger to a child, such as neglect. However, the system permits a change to the investigative response track if necessary.

General process for decisions about allegations of child abuse and neglect in a differential response system



The Department does not have a differential response system and must investigate all reports of child abuse or neglect. One potential advantage of differential response is that families may feel more engaged and satisfied with the child welfare system than they do going through an investigative response. Further, jurisdictions have found that using an alternative response did not compromise child safety. Although an alternative response may have higher up-front costs than an investigative response, it may be less costly over time.

Other jurisdictions' practices can help guide Arizona's re-implementation of differential response

Arizona formerly used differential response and may do so again using a new system—The Arizona Department of Economic Security (ADES) implemented a differential response program from 1998 to 2004 called Family Builders. Under this program, ADES referred low-risk child abuse and neglect reports to contractors for potential services, while it still investigated moderate- to high-risk reports. Family participation in the program was voluntary. The program had some positive outcomes, but ADES lacked information on whether contractors were providing adequate services at appropriate rates. After high-profile cases of child death or abuse, the program ended as an alternative response in 2004 but continued as a referral for services until 2010.



2016

In 2014, the Legislature directed the Department to examine a system that would permit an alternative to investigating all child abuse and neglect reports. In its July 2015 report to the Legislature, the Department recommended a two-track system including investigation of high- to moderate-risk reports and criminal conduct reports, and a family assessment response for low- and potential-risk reports. The recommendations also included a two-step process for assigning reports: (1) continue to screen allegations to determine those that require a department response and (2) determine an appropriate response, either investigation or family assessment, based on established criteria. The report also noted several actions needed to set up the infrastructure to support differential response.

Statutory changes needed to implement differential response—Statute requires the Department to investigate all child abuse and neglect reports, and statutory changes would be needed to allow for differential response. The Department has provided potential statutory changes to the Legislature, but it reported that it was working to address stakeholder concerns with the proposed language. The Department should continue to address stakeholder concerns and work with the Legislature to pursue any needed statutory changes that allow for differential response.

Common practices exist for implementing differential response—Although we did not identify a single best practice model for a differential response system, the Department should adopt common practices other jurisdictions used for implementing their differential response systems. Specifically:

- Like other jurisdictions, Arizona has criteria for determining whether to accept or screen out allegations of child abuse or neglect. Jurisdictions have also adopted criteria for determining which reports are ineligible for alternative response and must be investigated, and the Department has proposed such criteria. Jurisdictions' programs also permit switching from one response track to another track, which the Department has also recommended for its new differential response system.
- Some jurisdictions adopted a practice model that includes expectations and guidance for workers, and many jurisdictions also trained staff on their differential response systems.
- Although the services offered vary by jurisdiction, the Department will need to determine the array of services that should be available to families in the alternative response track, contract for these services as needed, and address any potential barriers to service accessibility. It should also monitor contracted service providers.
- Like other jurisdictions, the Department should decide on key implementation strategies, including determining whether additional funding is needed, dedicating staff positions to oversee implementation, phasing in the implementation, and determining whether additional peer expertise would be helpful.
- Internal and external stakeholders should be engaged in developing and implementing the differential response system, similar to other jurisdictions' practices. The Department has already used various strategies to include stakeholders, such as forming the initial multidisciplinary study team and drafting a communication plan that targets specific stakeholders.
- Similar to other jurisdictions, the Department should evaluate the differential response system to determine whether the system is implemented as intended and to measure program outcomes.

Recommendations

The Department should:

- Continue working with the Legislature on any necessary legislation that allows for differential response;
- Finalize and implement criteria and policies and procedures for making response assignment decisions and response track switching;
- Develop well-defined practices to guide workers and implement training for appropriate staff;
- Determine services that should be provided, address any potential barriers to service accessibility, and monitor contracted service providers;
- Decide on key implementation strategies such as phasing in the differential response system;
- Finalize its communication plan and allow stakeholder feedback during implementation; and
- Develop and implement processes for evaluating the differential response system.

TABLE OF CONTENTS



Introduction	1
Chapter 1: Other jurisdictions' practices can help guide Arizona's re-implementation of differential response	7
Arizona used differential response in the past and may do so again using a new system	7
Statutory changes needed to implement differential response in Arizona	10
Common practices exist for implementing differential response	12
Recommendations	21
Appendix A: Methodology	a-1
Agency Response	
Figure	
1 General process for decisions about allegations of child abuse and neglect in a differential response system	2
Table	
1 Comparison of some jurisdictions' differential response systems As of January 2016	3

INTRODUCTION

Scope and Objectives

As required by Laws 2015, Ch. 18, §6, the Office of the Auditor General has completed a special report addressing the use of a differential response system and case screening to manage reports of child abuse and neglect. As required by law, the report includes a review of the potential advantages and disadvantages of a differential response system (see pages 4 through 6) and the State's historical use of the Family Builders program (see pages 7 through 8). Additionally, the report addresses the use of set criteria in Arizona and other jurisdictions to screen out reports of child abuse or neglect from investigation (see pages 12 through 13). The report also identifies common practices from other jurisdictions in implementing a differential response system (see pages 12 through 21) and addresses jurisdictions' varied use of contractors in their differential response systems (see pages 2 through 4). Finally, the report contains recommendations for the Arizona Department of Child Safety (Department) as it moves forward with implementing a new differential response system (see pages 21 through 23).

Differential response systems

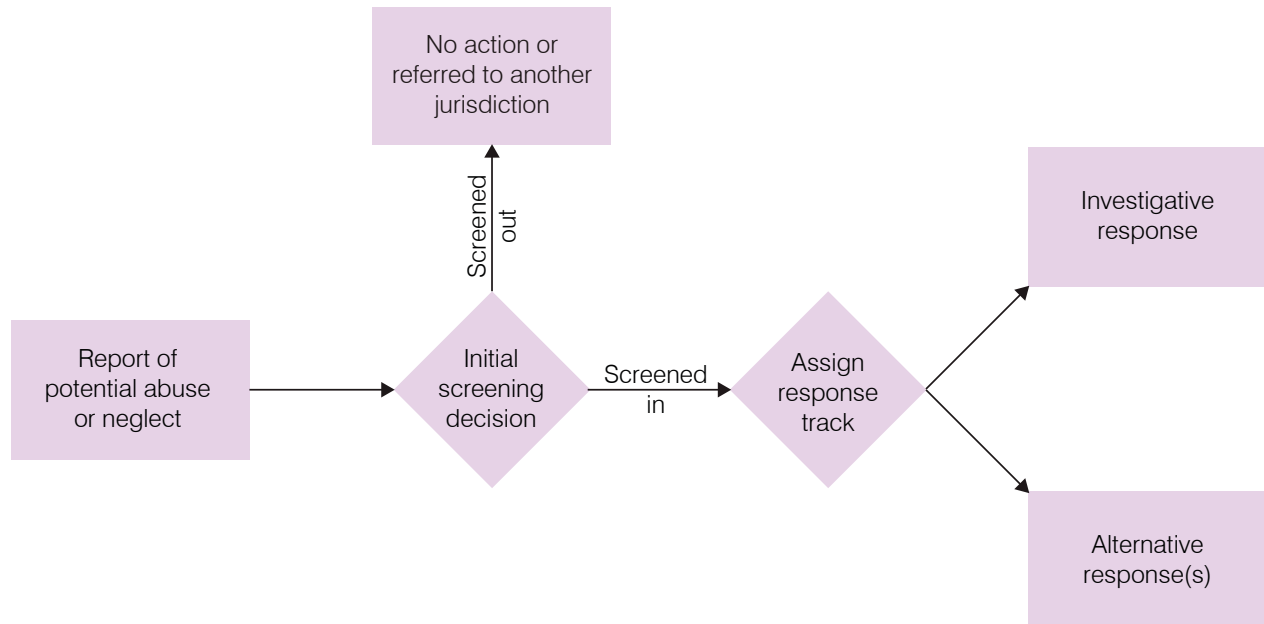
Differential response provides alternatives for responding to child abuse and neglect reports

A differential response system provides child welfare agencies with alternatives for responding to reports alleging child abuse and neglect. Traditionally, a child welfare agency would respond to reports by conducting an investigation to determine, or substantiate, whether the alleged abuse or neglect occurred.¹ A differential response system allows for (1) a traditional investigative response to a report or (2) one or more alternative responses. In contrast to an investigative response, an alternative response does not require an investigation or substantiation of the child abuse or neglect allegation, but instead focuses on engaging families to assess their needs and then connecting them with needed services. Examples of services that are often provided through an alternative response include substance abuse treatment and mental health counseling, child care assistance, car maintenance, and rent assistance. A family's participation in alternative response services is voluntary after an assessment is completed.

In a differential response system, deciding whether to assign a child abuse or neglect report to the investigative or alternative response is based on the level of risk associated with the report and the potential for imminent danger to the child. The investigative response is typically used for high-risk reports, such as sexual abuse, while an alternative response is typically used for low-and/or moderate-risk reports, such as neglect. However, differential response systems commonly allow for changing the response track to which a report is initially assigned if staff learn new information about safety or risk issues (see pages 14 through 15 for additional information). Figure 1 (see page 2) illustrates the general decision-making process for screening reports and assigning them to the appropriate response in a differential response system.

¹ As in other jurisdictions, department staff screen calls received by its child abuse and neglect allegation reporting hotline (hotline) to determine whether or not the allegation(s) constitutes a report of child abuse or neglect. Some allegations are screened out for no action or referred to another jurisdiction, such as an Indian reservation or a military installation. In its December 2015 semi-annual report to the Legislature, the Department reported it received 78,531 calls between April 1, 2015 and September 30, 2015. Of the 78,531 calls received, 26,022 calls met the statutory criteria for a report (see pages 12 through 13 for criteria). The other 52,509 calls were either screened out or referred to other jurisdictions. Only allegations that are screened in for department action are considered reports of child abuse or neglect.

Figure 1: General process for decisions about allegations of child abuse and neglect in a differential response system



Source: Auditor General staff analysis of differential response screening processes as described in the Children’s Bureau’s *Child Maltreatment 2014* report and other jurisdictions’ decision-making processes, including Colorado, Illinois, Nevada, and Ohio.

Many jurisdictions use differential response

Many jurisdictions have implemented a differential response system. According to a 2014 Casey Family Programs report, 21 states and Washington, D.C., had a differential response system in place, and 11 states, including Arizona, were planning/considering implementing one.¹ As of February 2016, Arizona does not use differential response because statute requires the Department to investigate all reports of child abuse and neglect. However, Arizona had a differential response system in the past, and the Department has developed recommendations for implementing a new differential response system (see Chapter 1, pages 7 through 10, for additional information).

Differential response systems vary among jurisdictions (Table 1 on page 3 shows the variation in differential response systems for five jurisdictions auditors reviewed). For example, jurisdictions may have different numbers of alternative responses to investigation, with some jurisdictions having one alternative response and others having more than one alternative response in the jurisdictions auditors reviewed. Jurisdictions that have more than one alternative response to investigation often separate reports into more categories based on families’ varying levels of need. For example, Hawaii has three response tracks, including an investigative response

¹ Guterman, K., Solarte, K., & Myslewicz, M. (2014). *The differential response (DR) implementation resource kit: A resource for jurisdictions considering or planning for DR*. Seattle, WA: Casey Family Programs.

**Table 1: Comparison of some jurisdictions' differential response systems
As of January 2016**

Jurisdiction	Responses	Allowable response switching ¹	Use of private contractors
Colorado	Investigative and one alternative response	Alternative to investigative	Some family services ²
Hawaii	Investigative and two alternative responses	Both directions	Safety/risk assessment and family services ³
Minnesota	Investigative and two alternative responses	Both directions	Family services (in some counties) ⁴
Nevada	Investigative and one alternative response	Alternative to investigative	Safety/risk assessment and family services
Ohio	Investigative and one alternative response	Alternative to investigative	Family services (in some counties) ⁵

¹ Indicates whether a jurisdiction allows reports to switch from one response track to another after the initial response assignment (see Chapter 1, pages 14 through 15, for additional information).

² Colorado's differential response system uses private contractors and county agencies to provide services to families. Caseworkers attempt to connect families to private service providers before using the services provided by the county agency. Contracted services include substance abuse treatment, mental health treatment, counseling, therapy, and other services that counties do not directly provide.

³ Hawaii's differential response system uses contracted providers for their low- to moderate-risk cases for such things as assessment, service planning, monitoring, and counseling, with assistance from child welfare staff as needed.

⁴ Minnesota's differential response system is state-supervised and county-administered. Minnesota differential response staff reported that only some counties use private contractors to provide services.

⁵ In Ohio, counties are responsible for assessment and case management, and some counties use private service providers for post-assessment services.

Source: Auditor General staff analysis of jurisdictions' reports and evaluations and interviews with other jurisdictions' child welfare agency staff.

for high-risk reports; one alternative response for moderate-risk reports, where services such as counseling can be provided for up to 12 months; and another alternative response for low-risk reports, where services such as short-term counseling can be provided for up to 6 months. In addition, according to a 2014 Children's Bureau issue brief, jurisdictions vary in the extent to which private contractors are used in their differential response systems. Specifically, in some jurisdictions, the child welfare agency provides all assessments and services, while in other jurisdictions, contractors provide them or there is a combined approach.¹ The majority of jurisdictions auditors reviewed use contractors for service provision following a safety assessment conducted by the child welfare agency. However, Nevada also contracts out the initial safety assessment of families assigned to the alternative response. Hawaii similarly uses contracted providers to conduct safety assessments for the alternative response cases, with assistance from its child welfare agency as needed. Further, jurisdictions auditors reviewed allowed cases to switch from the alternative response

¹ Children's Bureau. (2014). *Differential response to reports of child abuse and neglect*. Washington, D.C. The Children's Bureau is part of the Office of the Administration of Children and Families within the U.S. Department of Health and Human Services.

to the investigative response if new safety issues were identified, but varied on whether cases are allowed to switch from the investigative response to the alternative response. Chapter 1, pages 10 through 21, provides additional information on ways in which jurisdictions' differential response systems vary.

Potential advantages and disadvantages of using differential response

Although there are potential advantages and disadvantages to using a differential response system, results differ across jurisdictions. For example, studies of some jurisdictions that have implemented differential response systems have found that families participating in an alternative response reported feeling more engaged and satisfied with the child welfare system. Families may also be more likely to receive services through an alternative response. In addition, jurisdictions have found that using alternative responses did not compromise child safety. However, an alternative response may have higher up-front costs than an investigative response, but may be less costly over time. Further, the impact of differential response on caseload is difficult to determine, and implementing a differential response system can be complicated and take time. Specifically:

- **Family experience may be improved with alternative responses**—A 2014 Children's Bureau issue brief reported that, in some jurisdictions, families that participated in the alternative response experienced higher levels of satisfaction with the child welfare agency and were more cooperative than families who participated in the investigative response track.¹ One potential explanation for the higher levels of satisfaction is that the alternative response emphasizes family engagement compared to the adversarial approach often used in the investigative response when substantiating child abuse and neglect. Specifically, experts stated that the focus of alternative response is to connect the family to services and provide support, whereas family members in the investigative response are more likely to be treated as perpetrators. Additionally, in a 2014 report, the National Quality Improvement Center on Differential Response in Child Protective Services found that families who participated in the alternative response were more likely to receive services than families who participated in the investigative response.²
- **Child safety not compromised with use of alternative responses**—Both literature and experts state that children are found to be as safe in the alternative response as in the investigative response based on child safety measures.³ These measures include the rate of re-referral of a child or a family back to the child welfare system and the rate of child removal. For example, according to a 2012 Casey Family Programs study of ten jurisdictions using differential response, all but one were able to demonstrate "...either a reduction in re-referral rates for families assigned to the [alternative response] compared to

¹ Children's Bureau, 2014.

² National Quality Improvement Center on Differential Response in Child Protective Service. (2014). *Final report: QIC-DR cross-site evaluation*. Aurora, CO.

³ Children's Bureau, 2014. According to the Children's Bureau, this finding was maintained even when comparable lower-risk families were randomly assigned to response tracks.

the investigative track, or were able to show no difference (nonstatistically significant difference) between these two groups.”^{1,2} Similarly, the child removal rate for some jurisdictions, such as Minnesota, New York, and Ohio, was lower among alternative response families compared to families served through the investigative response.³ Additionally, according to a 2012 study published by the Institute of Applied Research, a potential benefit of a differential response system is that a caseworker may identify potential safety issues in addition to the original reported issue and connect the family to needed services because a caseworker spends more time with a family in the alternative response.⁴

- **Costs may increase upfront but potentially decrease over time**—Although auditors were not able to identify comprehensive cost analyses of implementing a differential response system, based on an evaluation conducted in Minnesota, the increased service provision in an alternative response can lead to higher up-front costs for a jurisdiction, but potential cost savings over time. Specifically, according to the Institute of Applied Research’s evaluations of Minnesota’s differential response system, the jurisdiction’s costs during initial contact with families were higher for families participating in the alternative response track, but a later followup showed the jurisdiction’s total costs were lower for these families over time.^{5,6} The study found that for the original evaluation conducted between 2001 and 2004, the jurisdiction’s initial contact costs for families that received an investigation were lower than the jurisdiction’s costs for the families that received an alternative response (\$905 compared to \$1,142).⁷ The higher costs for the alternative response families resulted from the cost of increased services and the increased time that staff spent with families. However, a follow-up evaluation found that the jurisdiction’s total costs through 2006 were greater for families that originally received an investigation than for the families that received an alternative response (\$4,967 compared to \$3,688). According to the evaluation, the average costs of additional staff time and contracted services during the follow-up period were less for the alternative response families than for the investigative response families, and the difference was large enough to offset the greater investment made during the initial contact for the alternative response families.
- **Impact of alternative response on caseload not easily determined**—The impact that a differential response system would have on worker caseload is not easily determined. Specifically, worker caseload depends on a variety of factors, such as the number of caseworkers assigned to the alternative response track and whether caseworkers work only on alternative response cases. However, according to a publication by the American Humane Association, alternative

¹ Casey Family Programs. (2012, p.9). *Comparison of experiences in differential response (DR) implementation: 10 child welfare jurisdictions implementing DR*. Seattle, WA. The ten jurisdictions examined were Contra Costa County, CA; Los Angeles County, CA; Hawaii; Illinois; Minnesota; Missouri; New York; North Carolina; Ohio; and Tennessee. This document contains a comparison of jurisdictions’ differential response systems compiled in 2012. Therefore, the time frames and methodology used differ between each jurisdictional evaluation.

² Evaluation results for one jurisdiction, Illinois, were not available at the time of the study’s publication.

³ Casey Family Programs. (2012). *Comparison of experiences in differential response (DR) implementation: 10 child welfare jurisdictions implementing DR*. Seattle, WA.

⁴ Siegel, G.L. (2012). *Lessons from the beginning of differential response: Why it works and when it doesn’t*. St. Louis, MO: Institute of Applied Research.

⁵ Siegel, G.L., & Loman, T. (2006). *Extended follow-up study of Minnesota’s family assessment response*. St. Louis, MO: Institute of Applied Research.

⁶ The study was designed as an experiment in which families that were eligible to receive an alternative response were randomly assigned to an experimental group—who participated in the alternative response track—or to a control group—who received a traditional investigation.

⁷ The authors state in the evaluation that one county was excluded from the study sample and cost analysis because data regarding purchased services was unavailable for that county.

response cases may be more time intensive for caseworkers because a caseworker may spend more time engaging with a family.¹

- **Implementing differential response can be complicated and take time**—There are many potential barriers to developing and implementing a differential response system that can make the process of doing so complicated and difficult for jurisdictions. According to two Casey Family Programs publications, barriers that can halt implementation of a differential response system include child safety concerns among stakeholders; inconsistent implementation in communities; a lack of buy-in and support for the differential response approach among stakeholders, such as law enforcement officials or judges; a lack of clearly defined practice expectations for caseworkers; and a lack of funding.^{2,3} For example, one study stated that Texas did not implement differential response throughout the jurisdiction due to difficulties with obtaining funding, despite a successful pilot program.⁴ Finally, experts recommend implementing a differential response system in phases over time and, because of this, full implementation of a differential response system can take several years (see Chapter 1, page 19).

¹ Brown, K.E., Cox, S.L., & Mahoney, N.E. (2012). From “pie in the sky” to the reality of implementation: Lessons learned by the SOAR consortium on the journey to differential response. *Protecting Children Journal*, 26(3), 21-31.

² Guterman, Solarte, & Myslewicz, 2014.

³ Casey Family Programs, 2012.

⁴ Casey Family Programs, 2012.

CHAPTER 1

Common practices from other jurisdictions' implementation of differential response systems can help guide Arizona's re-implementation of such a system. The State used differential response in the past through a program called Family Builders but ended this program in 2004. Under direction from the Legislature, the Arizona Department of Child Safety (Department) developed recommendations for a new differential response system and, as of February 2016, was moving forward with its implementation. As it does so, the Department will need to continue working with the Legislature to develop statutory changes that will allow for a differential response system. To further guide its implementation of differential response, the Department should also adopt common practices that other jurisdictions have used to implement their differential response systems. These practices include establishing formal criteria and policies and procedures for assigning cases to the appropriate response, establishing staff guidance and training, determining the services to be provided through the alternative response and monitoring service providers, phasing in the system, engaging stakeholders to help ensure buy-in, and developing processes for evaluating the system.

Other jurisdictions' practices can help guide Arizona's re-implementation of differential response

Arizona used differential response in the past and may do so again using a new system

Arizona has used a differential response system in the past and may do so again. Specifically, the State established a differential response system called Family Builders in 1997 but stopped the program in 2004. As required by the Legislature, the Department developed recommendations in 2015 for implementing a new differential response system and, as of February 2016, was moving forward with its implementation.

Prior differential response system ended in 2004—In 1997, the Legislature established a differential response pilot program called Family Builders within the Arizona Department of Economic Security (ADES), Division of Children, Youth and Families, the predecessor to the Department. Implemented in January 1998 in Maricopa and Pima Counties, Family Builders was established to address a backlog of uninvestigated child abuse and neglect reports and fill a need for early intervention services. Family Builders did not require a formal investigation, including a child safety assessment or the determination of findings of abuse or neglect. Under the program, the ADES referred potential- and low-risk child abuse and neglect reports to contractors for potential services, but still investigated moderate- and high-risk reports.¹ Upon a referral, a contractor had 48 hours to inform the family about the report and offer community-based services—such as parenting skills training, counseling, and utilities/rental assistance—aimed at reducing the family's problems that were contributing to the potential for abuse or neglect.² Families' participation in the program was voluntary, and if a family declined services, the contractor would close the case and inform the ADES. If a family accepted services, the contractor would work with the family to assess its strengths, prioritize needs, develop a service plan, and provide services. The contractor would close the case when the family completed the service plan or no longer desired services. In October 1999, the Department expanded the original service area to include all but five Arizona counties.³ By 2001, the Department was able to respond to 100

¹ Some reports, such as those alleging sexual abuse, were not eligible for Family Builders regardless of the risk level.

² If a contractor observed signs of abuse or neglect when contacting a family, the case was referred back to the ADES. Similarly, if the contractor observed signs of abuse or neglect while providing services to a family, the contractor was required to report this to the ADES.

³ The five counties not served by Family Builders were Gila, La Paz, Mohave, Pinal, and Yuma.

percent of all child abuse and neglect reports state-wide, either through investigation or by referring reports to Family Builders.

Prior audits of the Family Builders program by the Office of the Auditor General in 2000 and 2001 found that although Family Builders offered a larger scope of services to families compared to traditional ADES services, the program had similar outcomes with regard to subsequent abuse and neglect reports.¹ Specifically, the percentage of families with a subsequent abuse or neglect report was comparable for families participating in Family Builders who completed their service plans to low-risk families investigated by the Department. Further, the number of abuse and neglect reports per 10,000 persons was comparable for areas served and not served by Family Builders. Despite these similar outcomes, the 2001 Auditor General's report found some positive differences. For example, families participating in Family Builders who completed their service plans had fewer subsequent reports of abuse or neglect than families who initially accepted services but did not complete their service plans. Additionally, families receiving services through Family Builders reduced their risk for child maltreatment based on a caseworker assessment of child-centered, parent-centered, and economic risk factors.

However, these audits also found that the ADES needed to improve its monitoring and oversight of the Family Builders program. For example, the ADES lacked the necessary information to determine if contractors were delivering adequate services and being paid at appropriate rates. In addition, the ADES lacked complete and accurate information on the type, number, and cost of services delivered, and also experienced problems with missing, inaccurate, and duplicative program data.

In 2003, in response to high-profile cases of child death or abuse, the Legislature revised the Family Builders program by requiring the ADES to investigate every report and then determine which services Family Builders contractors could provide to the family. This change became effective June 30, 2004. As a result, Family Builders was used as a referral for services rather than a formal alternative response. In fiscal year 2010, the Legislature stopped funding Family Builders, effectively ending the program.

Department has developed recommendations for implementing a new differential response system—Under the direction of the Legislature, the Department developed recommendations for a potential new differential response system in Arizona. Specifically, Laws 2014, 2nd S.S., Ch. 1, §156, required the Department to “...examine the necessity of and requirements for protocols for not conducting a full investigation [of child maltreatment reports]” and to report its recommendations to legislative leaders by July 1, 2015. The legislation also required the Department to seek input from the Child Safety Oversight Committee and hold public meetings to obtain community comment on any recommendations. To help meet this requirement, the Department established a multidisciplinary design team to develop the recommendations for an alternative response to investigation referred to as the family assessment response. Design team members included representatives from the Department, Casey Family Programs, the Children's Action Alliance, and law enforcement, among others. As part of its research, the Department reported that it also conducted interviews with jurisdictions that had implemented differential response and visited two jurisdictions where differential response was in use—Washington, D.C., and the state of Washington—to observe their

¹ See Auditor General Report Nos. 00-4 (March 2000) and 01-30 (November 2001).

differential response systems. As required by the legislation, the Department reported that it also held public meetings in Phoenix, Flagstaff, Yuma, and Tucson to obtain community comment on proposed recommendations for the family assessment response. Additionally, in May 2015, the Department sought input from the Child Safety Oversight Committee.

The Department's report to the Legislature made several recommendations for a differential response system (see textbox for a summary of recommendations). Specifically, the Department recommended a two-track response system, including (1) its existing investigative response for high- to moderate-risk reports and criminal conduct reports; and (2) a family assessment response for low- and potential-risk reports. To ensure child safety, the Department proposed that its staff conduct a child safety assessment for both response types, as well as work with the family to identify strengths and resources that exist within the family and community and to assess the family's needs. Under the investigative response, the Department would still determine whether allegations of child abuse and neglect occurred and enter perpetrators in the Central Registry, a confidential database of substantiated child abuse and neglect reports. Under the family assessment response, the Department would not substantiate allegations of abuse or neglect, but would provide an array of department and community-based services to the families. The Department also recommended developing a third response track in the future focused on prevention services that could be added after the initial implementation of the two-track system, if there were sufficient funding and statutory changes to support this track. This proposed third track would address calls received at the hotline that do not meet the criteria for a report and would otherwise be screened out, including self-reports made by parents in need of services.

Department recommendations for differential response in Arizona

- Two-step process for screening allegations and assigning reports to a response track:
 - Step 1: Hotline workers would continue to screen reports to determine whether a department response is required.
 - Step 2: Department staff would determine which response, investigation or family assessment, to assign reports to.
- Two-track response system:¹
 - Investigative response for high- to moderate-risk reports and criminal conduct reports. The investigative response determines whether allegations occurred, and perpetrators are entered in the Central Registry.
 - Family assessment response for low- and potential-risk reports. The family assessment response does not substantiate allegations but provides services to families.
 - Department staff would conduct child safety assessments for both response types, as well as work with the family to identify strengths and resources that exist within the family and community and to assess the family's needs.
- Allow for reassignment of reports from the family assessment to the investigative response, and possibly the reverse, to help ensure assignment of cases to the appropriate response track.

¹ The Department also proposed an eventual third response track that would provide prevention services to families for calls that would otherwise be screened out, if there were sufficient funding and statutory changes to support this track.

Source: Auditor General staff analysis of the Department's *Family Assessment Response Protocols* report to the Legislature submitted on July 1, 2015, and interviews with department staff.

The Department also made recommendations for a two-step process for assigning reports to the most appropriate response track. In the first step, department hotline workers would continue to screen allegations to determine which allegations require a department response. The second step would be to determine if the accepted report is appropriate for the family assessment response based on criteria established by the Department, or if it requires an investigative response (see pages 13 through 14 for additional information about the Department's recommended criteria for determining the initial response). Department staff would also be responsible for making this second decision. To further ensure a report is assigned to the appropriate response, the Department also recommended allowing a report to be re-assigned from the family assessment to investigative response. This decision to switch tracks would be based on identified circumstances, such as when a new report of child abuse and neglect is received that requires an investigation or allegations containing criminal conduct are discovered during the family assessment response. The Department also identified the need for potential rule changes to allow cases to switch from the investigative to the family assessment based on new information learned during the investigation, as the Department may eventually include this option.

Finally, the Department's report noted that several actions were needed to establish the necessary infrastructure to support differential response. These actions include developing the necessary intake and family assessment tools, identifying in-home services needed to support the family assessment response, staff training requirements, policies and procedures, plans for ensuring the differential response system is implemented as designed, procedures for continuous quality improvement, and a potential phase-in schedule. The Department also reported that it would follow implementation science as it worked toward implementing the differential response system, which includes conducting exploratory research and analysis, creating the needed infrastructure, and conducting an initial implementation in select areas followed by a full implementation. As of February 2016, the Department reported that it was moving forward with implementing differential response and had begun drafting the necessary policy changes for the family assessment response. According to the Department, the new differential response model is not being developed to address a backlog of incomplete investigations but rather to better serve families. The Department has also been developing potential statutory changes that would allow it to implement differential response (see the next section for additional discussion on statutory changes).

Statutory changes needed to implement differential response in Arizona

As the Department moves forward with implementing a differential response system, it should continue working with the Legislature to develop statutory changes that allow for differential response. As discussed previously, statute requires the Department to investigate all child abuse and neglect reports; therefore, statutory changes are necessary to change the investigation requirement and allow for an alternative response. In its report to the Legislature, the Department included potential statutory changes that would allow the Department to respond to reports with either an investigation or family assessment, while excluding allegations containing criminal conduct from being eligible for the family assessment response track. Additionally, as

of February 2016, the Department had provided statutory language to the Legislature allowing for differential response, but it reported that it was working to address stakeholder concerns with the proposed language and may pursue legislation in the 2017 legislative session. The Department should continue to address stakeholder concerns and work with the Legislature to pursue any needed statutory changes that allow for differential response.

In addition, the Department should work with the Legislature to determine the extent to which the differential response system should be outlined in legislation. According to the Casey Family Programs' Differential Response Implementation Resource Kit (Resource Kit), nearly every jurisdiction surveyed had established their differential response systems through legislation, although this legislation varied in scope from jurisdiction to jurisdiction.^{1,2} Some jurisdictions used broad legislative language that gave child welfare administrators flexibility in shaping the differential response system with little legislative oversight. Similar to Arizona's implementation of the Family Builders program, other jurisdictions used a series of bills outlining pilot programs and system-wide implementation of differential response that offered more detailed guidance to child welfare administrators and allowed for more legislative engagement and oversight. For example, Ohio's legislation initially authorized an 18-month pilot program for differential response. Following this pilot, the legislation was revised to allow for system-wide implementation of differential response. Despite this variation in legislation, the Resource Kit identified various key components found in differential response legislation across the United States.³ These components include:

- **Establishment of a pilot program**—Nearly half of the jurisdictions surveyed in the Resource Kit had laws that required implementing differential response pilot programs prior to implementing differential response system-wide. Prior to system-wide implementation, all but one jurisdiction with a pilot program required formal recommendations regarding differential response be given to legislators and passage of additional legislation authorizing system-wide implementation (see page 19 for additional information about phasing in differential response implementation).
- **Key definitions of alternative responses**—The majority of jurisdictions surveyed in the Resource Kit defined their alternative response in legislation. Within the definition of alternative response, several jurisdictions also specified that no determination of abuse or neglect would be made. Jurisdictions also enacted legislation specifying the criteria that would mandate an investigative response rather than an alternative response (see pages 13 through 14 for additional information about decision criteria).
- **Service provision and community partnerships**—The majority of jurisdictions surveyed in the Resource Kit addressed service provision in legislation. Generally, jurisdictions kept language concerning service provision at a general level, such as authorizing child protection agencies to provide services to reduce future child maltreatment. However, some jurisdictions included

¹ Guterman, K., Solarte, K., & Myslewicz, M. (2014). *The differential response (DR) implementation resource kit: A resource for jurisdictions considering or planning for DR*. Seattle, WA: Casey Family Programs.

² Casey Family Programs looked primarily at 16 jurisdictions to identify variation in basic design components and features they considered important in the implementation of a differential response system. The jurisdictions included Colorado, Connecticut, Hawaii, Kentucky, Louisiana, Massachusetts, Minnesota, Missouri, Nevada, New York, North Carolina, Ohio, Virginia, Los Angeles County, San Francisco County, and Santa Clara County. For some aspects of differential response systems, Casey Family Programs also surveyed additional jurisdictions.

³ The Resource Kit notes that jurisdictions often establish further rules and guidelines for differential response within child welfare agency policies and procedures.

greater detail, such as the process for sharing case information between the public and private agencies.

- **Allowing response track switching**—To help ensure cases receive the most appropriate response, all jurisdictions surveyed in the Resource Kit allowed for track switching from the alternative to the investigative response, and some jurisdictions also allowed for the reverse (see pages 14 through 15 for additional information). Jurisdictions' laws addressed response track switching in over half of the jurisdictions surveyed. The remaining jurisdictions allowed for this switch within child welfare agency policy.

Common practices exist for implementing differential response

As the Department moves forward with implementing a differential response system, it should follow common practices used in other jurisdictions to guide its implementation of the system. Although auditors did not identify a single best practice model for a differential response system, common practices for implementing differential response exist. Many of these practices are outlined by Casey Family Programs in its Resource Kit and include establishing formal criteria and policies and procedures for assigning child abuse and neglect reports to the appropriate response and establishing practice expectations, staff guidance, and training to help ensure consistency and competence within the differential response system. Additional practices include determining which services should be provided through the alternative response, ensuring services are accessible, and monitoring service providers; considering key implementation components, such as phasing in the system; engaging stakeholders to help ensure buy-in; and developing processes for evaluating the differential response system.

Formal policies should guide response decisions—Like other jurisdictions, Arizona has established criteria for screening in reports of child abuse or neglect for department response, but as it moves forward with implementing a differential response system, it needs to establish criteria and policies and procedures for assigning reports to the appropriate response. These policies and procedures should allow for switching reports from one response track to another, as appropriate and consistent with any legislative direction. Specifically:

- **Report screening**—Similar to Arizona, other jurisdictions have established specific criteria for determining which allegations to accept, or screen in, as a report requiring a child welfare agency response. Although specific screening criteria varies among jurisdictions in terms of scope and detail, the Children's Bureau's *Child Maltreatment 2014* report lists common elements among jurisdictions' screening criteria.¹ These may include one or more of the following:
 - The report relates to potential child abuse and neglect;
 - The report includes adequate information for a child welfare agency response to take place;

¹ Children's Bureau. (2016). *Child maltreatment 2014*. Washington, D.C.

- The response by the child welfare agency is considered more appropriate than a response from a different agency;
- The children involved were not the responsibility of a different agency or jurisdiction, such as a military installation or Indian reservation; and
- The children involved are under the age of 18.

Arizona’s screening criteria, which are directed by statute and included in department policy, contain similar elements. Specifically, Arizona Revised Statutes (A.R.S.) §8-455 requires a hotline worker to accept an allegation for investigation if the alleged conduct constitutes abuse or neglect as defined in statute; the alleged victim is under 18; the alleged victim is a resident of or present in the State or any act involved in the alleged maltreatment occurred in the State; and the alleged perpetrator is a parent, guardian, or custodian of the alleged victim or an adult member of the victim’s household. However, legislation proposed in the 2016 legislative session would alter this criteria. Specifically, if passed, House Bill 2522 would also require that an allegation not be screened in as a report if the alleged conduct occurred more than 3 years before the communication to the hotline and if there is no information or indication that the child victim is currently being abused or neglected. This legislation also proposes alterations to screening criteria so that the identity or current location of the child victim, the child’s family, or the person suspected of abuse or neglect must be known or reasonably ascertained for a call to meet report criteria. As of March 30, 2016, the bill was still under legislative review.

- **Initial response assignment**—Many jurisdictions auditors reviewed had established criteria for determining which reports would be appropriate for the investigative response and, therefore, ineligible for an alternative response. Specifically, in many jurisdictions, high-risk reports—such as sexual abuse, criminal conduct, severe neglect, and child fatality—are assigned for investigation. Similarly, in its report to the Legislature, the Department recommended that the following reports automatically receive investigation:
 - High-risk reports alleging serious harm to a child;
 - Reports alleging sexual abuse of a child;
 - Reports alleging criminal conduct;
 - Reports involving children in department custody; and
 - Reports indicating a current physical abuse injury.

The Department also recommended including additional criteria that staff could use at their discretion to decide whether a report should be ineligible for the family assessment response. These recommended discretionary criteria may include but are not limited to the presence of frequent, similar, or recent past reports; a history of declined services by a parent or caregiver; and a demonstrated inability or unwillingness by a parent or caregiver to achieve child safety in the past.

In addition to developing criteria to guide the initial response assignment, most jurisdictions surveyed in the Resource Kit established processes identifying at what point during intake a response decision is made and which staff are responsible for making the decision. However, there is variation among jurisdictions with regard to when the decision is made and those responsible for making it. For example, the Resource Kit reported that, for the majority of jurisdictions surveyed, the assignment decision was made at the intake/hotline stage by a hotline worker in consultation with a supervisor.¹ In comparison, the Resource Kit noted that some jurisdictions rely on teams composed of multidisciplinary staff for making the assignment decision. For example, Colorado uses a team decision-making process called a RED (Review, Evaluate, and Direct) Team in making response assignment decisions.²

- **Switching response tracks**—Finally, if changes in safety or risk factors are identified when working with a family, allowing a report to switch from one response to another can help ensure reports are placed in the most appropriate response track. All jurisdictions surveyed in the Resource Kit allowed cases to switch from the alternative response to the investigative response when safety or risk issues were discovered. According to the Resource Kit, allowing cases to switch from the alternative response to the investigative response acts as a safeguard if staff learn new information regarding child safety that was unknown when the report was assigned.³

Conversely, not all jurisdictions surveyed in the Resource Kit allowed cases to switch from the investigative response to the alternative response.⁴ The Resource Kit stated several reasons jurisdictions were less likely to allow response switching from the investigative to the alternative response. For example, during their differential response pilot programs, both Ohio and Colorado found that allowing for this switch created complicated data entry and tracking issues. The capacity of jurisdictions' data systems is another common barrier for this type of response switching. Once a case has been assigned and open for investigation, significant changes in the data system can be necessary to reassign it to the alternative response. These changes can be both time consuming and expensive. Thus, some jurisdictions surveyed in the Resource Kit stressed the importance of planning for data system changes early on in the differential response implementation process.⁵ If this track switch is allowed following an initial investigation, it is most often because the child protection agency has assessed that the child's safety is not at risk and the family can be better served through an alternative response. However, this switch generally requires a review process to ensure the correct response assignment.

Multiple experts auditors interviewed echoed the importance of establishing criteria to allow for cases to switch response tracks. According to one expert, the initial assignment decision is often made with limited information collected during the report intake process, making it dependent on the quality and quantity of information provided by reporters and gathered through other administrative databases. However, once a worker is able to

1 Guterman, Solarte, & Myslewicz, 2014.

2 Guterman, Solarte, & Myslewicz, 2014.

3 Guterman, Solarte, & Myslewicz, 2014.

4 Guterman, Solarte, & Myslewicz, 2014.

5 Guterman, Solarte, & Myslewicz, 2014.

interact with a family, additional information is collected that provides for a better assessment of the situation. Another expert stated that after collecting additional information, caseworkers should have the ability to assign a report to the best response if the initial response assignment was not appropriate.

As stated previously, the Department's report to the Legislature recommended allowing a report to be re-assigned from the family assessment to the investigative response and, potentially in the future, from the investigative to the family assessment response.

As the Department moves forward with implementing differential response, it should finalize and implement its criteria and policies and procedures for making response assignment decisions, including policies and procedures regarding when the response assignment decision will be made and who will be responsible for making it. These policies and procedures should allow for response track switching, as recommended by the Department, and should include criteria or guidance for making re-assignment decisions, such as a review process. Further, the Department should ensure that its data system can accommodate any response assignment changes.

Practice expectations, staff guidance, and training help ensure consistency and competence—When implementing a differential response system, some jurisdictions developed practice models to provide staff guidance and expectations, and many jurisdictions provided training for caseworkers and supervisors. These practices help ensure consistency of social work practice and staff competence. Specifically:

- **Developing practice expectations and guidance for workers**—In order for jurisdictions to avoid potential barriers to differential response implementation, such as employee distrust or resistance to change, some jurisdictions have developed and implemented a practice model that establishes expectations and guidance for workers (see textbox). Such a model helps to outline the jurisdiction's expectations for the differential response system and aids in shifting caseworker practice to a more engaging, less adversarial approach of working with families in the child welfare system. Additionally, consistent with implementation best practices, staff performance should be evaluated to assess adherence to practice expectations and help ensure the competence of differential response workers.

Practice model

A practice model connects the conceptual approach of an agency to the everyday application of practice. It contains definitions and explains how workers will interact with various stakeholders throughout the process. A practice model helps to guide daily interactions and explains standards for practice in completing everyday work tasks.

Source: The Child Welfare Information Gateway.

For example, according to the Resource Kit, Ohio implemented a differential response practice model that was behavior-based, such that the model could be taught, learned, and measured.¹ Ohio's practice model specified ten worker skill sets considered crucial to the implementation of differential response.² Within each of these skill set areas, the model

¹ Guterman, Solarte, & Myslewicz, 2014.

² The ten worker skill sets are: engaging, assessing, partnering, planning, implementing, evaluating, advocating, communicating, demonstrating cultural and diversity competence, and collaborating.

provides for a way to evaluate skill proficiency by assessing whether staff fall into three possible categories: ideal practice, developmental practice, and unacceptable practice. See textbox for an example of the skill set “assessing.”

Example from Ohio’s practice model worker skill set “assessing”

Assessing includes gathering information about reported concerns and family needs, evaluating the relevance of that information, and identifying family strengths and community resources that may be applied to address those concerns and needs.

- **Ideal practice**—Conducts an assessment of child safety with all family members present, unless separate interviews are indicated or required by Ohio laws, and jointly plans with the family for any immediate safety needs.
- **Developmental practice**—Conducts an assessment of child safety with the caregiver and the child present, and addresses any immediate safety needs both with and without family input.
- **Unacceptable practice**—Conducts the initial assessment with minimal or no family participation. Pays insufficient attention to the child’s (children’s) safety concerns.

Source: Fundamentals of Ohio’s Differential Response System and Child Welfare Practice Model.

As the Department moves forward with implementing differential response, it should develop and implement well-defined practices that establish expectations for and guide the social work practices of caseworkers within the differential response system. The Department should also develop and implement policies and procedures for assessing staff adherence to the defined practices and help ensure the competence of differential response workers.

- **Training staff to work in a differential response system**—Training staff is an important practice in a differential response system. However, jurisdictions vary in how training is provided and who receives training. For example, the Resource Kit reports that 7 of the 16 jurisdictions surveyed provided the same training to both the alternative response and investigative response workers.¹ The Resource Kit also found that in 6 other jurisdictions, all caseworkers received the same core training, but differential response workers received additional training specific to the jurisdictions’ differential response systems.² Additionally, according to child welfare agency managers who were interviewed by Casey Family Programs regarding the implementation of differential response systems, one training regarding differential response is not enough, and caseworkers need to be immersed in differential response through ongoing trainings, shadowing opportunities, and coaching, which should include both supervisors and workers.³ Further, experts auditors spoke with also noted the importance of training supervisors because of their influence during implementation of a differential response system.

¹ Guterman, Solarte, & Myslewicz, 2014.

² Guterman, Solarte, & Myslewicz, 2014.

³ Casey Family Programs. (2012). *Comparison of experiences in differential response (DR) implementation: 10 child welfare jurisdictions implementing DR*. Seattle, WA.

As the Department moves forward with implementing differential response, it should develop and implement training for all appropriate staff, including supervisors, regarding the differential response system, which the Department noted would need to be done in its report to the Legislature.

Department should determine services to be provided, ensure service accessibility, and monitor service providers—In its report to the Legislature, the Department reported that community partnerships and contractors will be needed to provide an array of individualized and culturally sensitive services to families in the alternative response track. Service provision is a main focus of differential response. Although the array of services offered in differential response systems varies across jurisdictions, experts noted the importance of having a robust set of community services for families. Further, services provided through the alternative response are more likely to address families’ material needs—such as support for housing, food, transportation, clothing, job training, and child care—than services provided through the investigative response.¹ Arizona provided similar services in the past through its Family Builders program, including child day care, housing relocation, parenting skills training, transportation, respite services, and guidance counseling.² As with Family Builders, the Department should determine the array of services that should be available to families in the alternative response track and contract for these services as needed.

The Department would also need to ensure that these services would be accessible to families throughout the State.³ According to literature, children and families in rural areas often face barriers to obtaining services, including lack of access to transportation and an inability to pay fees for services.⁴ As a way to help ensure services are accessible, the National Advisory Committee on Rural Health and Human Services (Committee) recommends that, in rural areas, many services could be housed in one location, with one central administrative “anchor organization” helping to lead coordination efforts and ensure cohesion of services among various service providers.⁵ Additionally, the Committee identified various models of anchor organizations used in rural communities, including government agencies and nonprofit organizations. As the Department moves forward with implementing differential response, it should identify any potential barriers to service accessibility throughout the State and take steps to address those barriers, as appropriate.

Finally, the Department would need to monitor contracted service providers to ensure that children and families receive needed services and to monitor program costs. As discussed previously, prior audits of the Family Builders program by the Office of the Auditor General found inadequate contract monitoring of the program by the Department’s predecessor, ADES. For example, the program lacked the necessary information to determine if contractors were delivering adequate services and being paid at appropriate rates. In addition, the program lacked complete and accurate information on the type, number, and cost of services delivered.

¹ Guterman, Solarte, & Myslewicz, 2014.

² Statute listed the minimum services that contractors needed to provide under the Family Builders program.

³ Past audit findings and an independent evaluation of the Department show challenges with service provision, including inadequate access to behavioral health services, concerns with service capacity, and inadequate service availability to implement in-home safety plans. See Office of the Auditor General Report Nos. 14-107, 15-118, and 15-CR1.

⁴ Belanger, K., & Stone, W. (2008). The social service divide: Service availability and accessibility in rural versus urban counties and impact on child welfare outcomes. *Child Welfare*, 87(4), 101-124.

⁵ National Advisory Committee on Rural Health and Human Services. (2014). *The intersection of rural poverty and federal human services programs*. Rockville, MD: HRSA Office of Rural Health Policy.

During the audit, the Department was taking steps to improve contract monitoring department-wide by developing a contract monitoring unit (unit) and was in the process of developing practices and standards to guide the unit's operations. The unit will monitor contract requirements, fiscal operations, and operating processes by conducting on-site reviews and desk reviews of contractors and by offering technical assistance to contractors. Based on review findings, department management will take action as needed, such as requesting a corrective action plan. As part of this unit's development, the Department has created a form to help department staff report on performance issues with service contractors. This form is used to document any reported concerns or issues for the Department to review and take appropriate action. As it moves forward with implementing differential response, the Department should ensure that contractors providing alternative response services are monitored by this contract monitoring unit.

Key implementation strategies should be decided—Prior to implementing a differential response system, the Department should decide, in consultation with the Legislature as needed, several key implementation strategies such as determining funding needs and sources, staff needed to oversee implementation, how to phase in the implementation, and whether additional peer research is needed. Specifically:

- **Funding differential response implementation and operation**—Jurisdictions vary in how they fund differential response implementation and operation. For example, although some jurisdictions had access to additional external funding, such as federal and private grants, for implementing differential response, other jurisdictions did not have access to such funding and implemented differential response with no additional funding. Although funding levels for overall implementation vary, according to the Resource Kit, "...[d]ifferential response often requires additional up-front investments in implementation and front-end services, and then may return cost savings over time through reductions in foster care maintenance costs, as well as future family involvement in child welfare."^{1,2}
- **Dedicating staff to oversee differential response implementation**—Most jurisdictions surveyed in the Resource Kit created dedicated staff positions or redirected staff responsibilities to oversee the implementation of their differential response systems. According to the Resource Kit, of the 16 jurisdictions surveyed, 8 reported having at least 1 dedicated staff position whose sole focus was to manage the implementation of the differential response system, while an additional 6 jurisdictions had at least 1 primary staff member who focused on differential response implementation but also had other assigned duties. Additionally, one expert cited in the Resource Kit explained that dedicated positions are just as important to the success of a differential response system as the design of the program and that dedicated positions are needed because new programs do not run themselves.³

¹ Guterman, K., Solarte, K., & Myslewicz, M. (2014, p.57). *The differential response (DR) implementation resource kit: A resource for jurisdictions considering or planning for DR*. Seattle, WA: Casey Family Programs.

² As discussed in the Introduction (see page 5), according to the Institute of Applied Research's evaluation of Minnesota's differential response system, the jurisdiction's costs during initial contact were higher for families participating in the alternative response track, but a later followup showed the jurisdiction's total costs were lower for these families over time.

³ Guterman, Solarte, & Myslewicz, 2014.

- **Phasing in differential response**—Experts auditors contacted recommended that differential response be implemented in phases over time. Additionally, implementation research suggests that implementing any new practice should include conducting an initial implementation followed by a full implementation.¹ According to the Resource Kit, 11 of the 16 jurisdictions surveyed implemented their differential response systems in phases, such as through pilot programs followed by system-wide implementation. The majority of these jurisdictions phased in their systems over a period of at least 5 years. For example, Ohio took 7 years to implement differential response across its 88 counties. Only 5 of the 16 jurisdictions surveyed in the Resource Kit implemented their differential response systems without phasing them in.
- **Using peer expertise to inform differential response implementation**—Learning from peers who have implemented differential response systems is a common practice. Specifically, according to the Resource Kit, “[d]ifferential response systems have largely been built on the shoulders of those who have gone before, capitalizing on important lessons learned, as well as barriers to avoid.”² Peer expertise can be obtained from a variety of sources, including other states, county-to-county assistance, external consultants, or federally funded Training and Technical Assistance Centers.³ For example, prior to implementation, child welfare agency leadership from Colorado worked closely with individuals from Minnesota to learn from and consult with that jurisdiction about its experiences implementing differential response. Additionally, jurisdictions commonly seek peer expertise to assist with drafting legislation, developing assessment tools, planning implementation, defining changes to practice, developing staff, and modifying data systems. As discussed previously, the Department has conducted interviews with jurisdictions that had implemented differential response and visited other jurisdictions where differential response was in use to learn more about implementation.

As the Department moves forward with implementing differential response, it should determine, in consultation with the Legislature as needed, the following:

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

Stakeholders should be engaged to help ensure buy-in—The Resource Kit indicates that engaging internal and external stakeholders when implementing differential response helps

¹ Fixsen, D.L., Naoom, S.F., Blase, K.A., Friedman, R.M., & Wallace, F. (2005). *Implementation research: A synthesis of literature*. Tampa, FL: University of South Florida, Louis de la Parte Florida Mental Health Institute.

² Guterman, K., Solarte, K., & Myslewicz, M. (2014, p.57). *The differential response (DR) implementation resource kit: A resource for jurisdictions considering or planning for DR*. Seattle, WA: Casey Family Programs.

³ According to the Resource Kit, federally funded Training and Technical Assistance Centers include the Quality Improvement Center for Differential Response (QIC-DR), the National Resource Center for In-Home Services (NRC-IHS), or the National Resource Center for Child Protective Services (NRC-CPS).

ensure their buy-in and may help overcome potential barriers, including distrust of the system or resistance to change. For example, in Illinois, unmet expectations about differential response outcomes resulted in resentment and frustration among caseworkers. Specifically, according to an evaluation of Illinois' differential response implementation, supervisors and department investigators reported that they understood that a benefit of differential response would be a reduction in investigative caseloads due to cases being diverted to an alternative response.¹ Investigative supervisors said that caseloads did not decrease because too few cases were diverted to an alternative response and because staff investigator positions were not filled after investigators transferred to become alternative response caseworkers. As a result, caseloads for investigation caseworkers increased, which led to resentment and friction between caseworkers in the alternative and investigative tracks.

According to the Resource Kit, jurisdictions have used various strategies to communicate to stakeholders during differential response implementation. Some strategies have included scheduling in-person and webinar meetings, giving presentations in-person and online, and distributing newsletters to gain community acceptance of differential response. Additionally, some jurisdictions tailored communications for specific audiences and used research-based material regarding child safety outcomes to address stakeholder concerns about child safety in the differential response system. Specific audiences included internal staff and external stakeholders, such as school personnel, medical professionals, and law enforcement. For example, in Ohio, counties used a variety of methods to reach various audiences including newsletters, individual letters to community partners, informational sessions offered in hospitals, schools, and mental health agencies in the community, and regular informal updates and presentations about differential response. In contrast, nearly half of the 16 jurisdictions reviewed in the Resource Kit did not dedicate substantial resources to communicating with stakeholders about differential response, and, in hindsight, some wished they had devoted more time to doing so during implementation.

In addition, a majority of the 16 jurisdictions surveyed in the Resource Kit had established processes for allowing stakeholders to provide feedback about differential response implementation. Strategies used to solicit stakeholder feedback included holding community forums, meeting directly with stakeholders, and conducting surveys of workers and supervisors. Further, the Casey Family Programs jurisdiction comparison states that organizations can "...incorporate feedback from caseworkers, families, and stakeholders, as well as research findings, to improve practices and create more efficient processes."² In one jurisdiction, although no formal feedback process was established, differential response workers decided they needed an outlet to share how the implementation process was progressing and started meeting informally on their own to share information about the new program and implementation.

As discussed previously (see pages 8 through 9), the Department used various strategies to engage stakeholders in the process of developing its recommendations for differential response that it submitted to the Legislature. For example, the Department established a

¹ Fuller, T., Kearney, K.A., & Lyons, S. (2012). *Differential response in Illinois: 2011 site visit report*. Urbana, IL: University of Illinois, School of Social Work, Children and Family Research Center.

² Casey Family Programs. (2012, p.13). *Comparison of experiences in differential response (DR) implementation: 10 child welfare jurisdictions implementing DR*. Seattle, WA.

multidisciplinary design team that included stakeholders to help develop the recommendations and held public meetings to obtain community comment. Further, the Department has developed a preliminary communication plan that targets specific internal and external audiences such as department staff, courts, and service providers, and includes strategies to communicate about differential response implementation. As the Department moves forward with implementing differential response, it should finalize and implement its strategic communications plan and develop and implement processes to allow stakeholders to provide feedback during implementation.

Differential response system should be evaluated—Evaluation of a differential response system can provide valuable information about the system over time. For example, according to the Children’s Bureau, new jurisdictions that move forward with implementing differential response can benefit from the lessons learned from evaluation and practice experiences across various jurisdictions. Additionally, the Children’s Bureau states that many jurisdictions have started implementing differential response with a pilot test and an accompanying evaluation. Further, after initial implementation, many jurisdictions continue to modify the practices, processes, and structures of their approach to differential response.¹

According to the Children’s Bureau, common components of differential response evaluations include examining whether the differential response system is implemented as intended and measuring outcomes such as family satisfaction, employee satisfaction, types of services delivered to families, re-referral rates of families, child removal rates, and cost to implement (see Introduction, pages 4 through 6, for additional information about what studies have found). Further, at least 20 jurisdictions have completed evaluations of their differential response systems to measure these common outcomes.²

As the Department moves forward with implementing differential response, it should develop and implement processes for evaluating its differential response system. These processes should review and determine whether the differential response system is being implemented as intended and include an assessment of performance measures such as family satisfaction, employee satisfaction, types of services delivered to families, re-referral rates of families, child removal rates, and cost to implement.

Recommendations:

As the Department moves forward with implementing a differential response system, it should:

1. Continue to address stakeholder concerns and work with the Legislature to pursue any needed statutory changes that allow for differential response.
2. Work with the Legislature to determine the extent to which the differential response system should be outlined in legislation.

¹ Children’s Bureau. (2014). *Differential response to reports of child abuse and neglect*. Washington, DC.

² Children’s Bureau, 2014.

3. Finalize and implement its criteria and policies and procedures for making response assignment decisions, including policies and procedures regarding when the response assignment decision will be made and by whom. These policies and procedures should allow for response track switching, and the Department should develop and implement criteria or guidance, such as a review process, to help ensure that decisions to switch response tracks are appropriate and should ensure that its data systems can accommodate these changes.
4. Develop and implement well-defined practices that establish expectations for and guide the social work practices of caseworkers within the differential response system.
5. Develop and implement policies and procedures for assessing staff adherence to the defined practices and help ensure the competence of differential response workers.
6. Develop and implement training for all appropriate staff, including supervisors, regarding the differential response system.
7. Work to:
 - a. Determine the array of services that should be available to families in the alternative response track and contract for these services as needed;
 - b. Identify any potential barriers to service accessibility throughout the State and take steps to address those barriers, as appropriate; and
 - c. Ensure that contractors providing alternative response services are monitored by its contract monitoring unit.
8. Determine the following, in consultation with the Legislature as needed:
 - a. Whether additional funding will be needed to implement the differential response system and how the funding will be obtained;
 - b. Whether staff should be dedicated to oversee the differential response system's implementation;
 - c. An appropriate and reasonable time frame for phasing in the differential response system; and
 - d. Whether additional peer research would be helpful prior to implementation.
9. Finalize and implement its strategic communications plan and develop and implement processes to allow stakeholders to provide feedback during implementation.

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

APPENDIX A

Methodology

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

Auditors used the following methods to meet the report objectives:

- Interviewed department staff and reviewed applicable state and federal laws and rules, department policies and procedures regarding hotline intake and decision making, and other information obtained from the Department, including plans regarding the development of a contract monitoring unit and the Department's July 2015 report to the Legislature containing its recommendations for family assessment response protocols.
- Reviewed literature related to the use, implementation, and evaluation of differential response systems in child welfare agencies to identify other jurisdictions' practices and best practices, as cited throughout the report. As part of this literature review, auditors reviewed a 2014 Casey Family Programs publication entitled *The Differential Response (DR) Implementation Resource Kit: A Resource for Jurisdictions Considering or Planning for DR*, which involved a survey of 16 jurisdictions across the United States regarding their implementation of differential response.¹ Auditors also interviewed child welfare agency staff in select jurisdictions to confirm their differential response practices as reported in literature, including Colorado, Hawaii, Minnesota, Nevada, and Ohio.
- Interviewed child welfare experts regarding best or common practices in differential response systems from Action for Child Protection, the Institute of Applied Research, The Kempe Center for the Prevention and Treatment of Child Abuse and Neglect, the University of Illinois, and Casey Family Programs.
- Conducted two observations of the Department's hotline intake process in January 2016.

¹ Guterma, K., Solarte, K., & Myslewicz, M. (2014). *The differential response (DR) implementation resource kit: A resource for jurisdictions considering or planning for DR*. Seattle, WA: Casey Family Programs.

AGENCY RESPONSE



March 29, 2016

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

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

Dear Ms. Davenport:

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

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

Sincerely,

Gregory McKay
Director

Enclosure

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



ARIZONA DEPARTMENT OF CHILD SAFETY

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

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

RECOMMENDATION 1

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

DCS Response:

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

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

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

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

RECOMMENDATION 2

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

DCS Response:

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

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

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

RECOMMENDATION 3

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

DCS Response:

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

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

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

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

RECOMMENDATION 4

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

DCS Response:

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

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

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

RECOMMENDATION 5

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

DCS Response:

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

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

RECOMMENDATION 6

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

DCS Response:

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

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

RECOMMENDATION 7

Work to:

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

DCS Response:

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

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

RECOMMENDATION 8

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

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

DCS Response:

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

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

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

RECOMMENDATION 9

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

DCS Response:

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

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

RECOMMENDATION 10

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

DCS Response:

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

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

Performance Audit Division reports issued within the last 12 months

15-101	Arizona Department of Child Safety—Child Abuse or Neglect Reports, Substantiation Rate, and Office of Child Welfare Investigations
15-102	Arizona Department of Administration—State-wide Procurement
15-103	Arizona Medical Board—Licensing and Registration Processes
15-104	Arizona Department of Transportation—Motor Vehicle Division
15-105	Arizona Department of Revenue—Use of Information Technology
15-CR1	Independent Review—Arizona’s Child Safety System and the Arizona Department of Child Safety
15-CR1SUPP	Supplemental Report to the Independent Review—Arizona’s Child Safety System and the Arizona Department of Child Safety
15-106	Arizona State Retirement System
15-CR2	Independent Operational Review of the Arizona State Retirement System’s Investment Strategies, Alternative Asset Investment Procedures, and Fees Paid to External Investment Managers
15-107	Arizona Sports and Tourism Authority
15-108	Arizona Department of Administration—Personnel Reform Implementation
15-109	Arizona Department of Administration—Sunset Factors
15-110	Arizona Foster Care Review Board
15-111	Public Safety Personnel Retirement System
15-CR3	Independent Operational Review of the Public Safety Personnel Retirement System Investment Strategies, Alternative Asset Investment Procedures, and Fees Paid to External Investment Managers
15-112	Arizona Commerce Authority
15-113	Arizona Department of Transportation—Transportation Revenues
15-114	Arizona Department of Transportation—Sunset Factors
15-115	Arizona Radiation Regulatory Agency, Arizona Radiation Regulatory Hearing Board, and Medical Radiologic Technology Board of Examiners
15-116	Arizona Department of Revenue—Security of Taxpayer Information
15-117	Arizona Department of Revenue—Sunset Factors
15-118	Arizona Department of Child Safety—Child Safety, Removal, and Risk Assessment Practices
15-119	Arizona Department of Environmental Quality— Vehicle Emissions Inspection Program
15-120	A Comparison of Arizona’s Two State Retirement Systems
15-121	Alternatives to Traditional Defined Benefit Plans
16-101	Arizona Department of Education—K-3 Reading Program

Future Performance Audit Division reports

Arizona State Board of Respiratory Care Examiners