

A REPORT
TO THE
ARIZONA LEGISLATURE

Performance Audit Division

Performance Audit

Department of Economic Security—

Division of Children, Youth and
Families—Child Protective Services—
CHILDS Data Integrity Process

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Debra K. Davenport
Auditor General

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May 24, 2005

Members of the Arizona Legislature

The Honorable Janet Napolitano, Governor

Mr. David A. Berns, Director
Department of Economic Security

Transmitted herewith is a report of the Auditor General, a Performance Audit of the Department of Economic Security—Division of Children, Youth and Families—Child Protective Services—CHILDS Data Integrity Process. This audit was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1966.

The report addresses the need for the Division to improve its data integrity process and training program and to streamline its CPS processes to improve the reliability of data critical to CPS operations. The Division's comprehensive case management computer system, CHILDS, contains key information about the children involved in the State's child welfare system and the providers of services to these children and their families.

The report found that while the Division has implemented components of a data integrity process, some components should be improved to increase their effectiveness. For example, problems noted on exception reports and online alerts are not resolved in a timely manner and supervisory monitoring of that process is not fully effective. In addition, while the Division has recently taken steps to improve its training program, the Division needs to address the consistency of CHILDS field training throughout the State, provide mandatory refresher trainings focused on significant changes to CHILDS, and better evaluate the effectiveness of the training that is provided to case managers. Finally, since workload was frequently cited by case management staff as the reason data is not accurate, timely, or complete, the Division needs to comprehensively review CPS work processes to identify and address those that can be streamlined or eliminated to help ensure that staff have sufficient time to maintain CHILDS data.

As outlined in its response, the Department of Economic Security agrees with the finding and plans to implement all of the recommendations.

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

This report will be released to the public on May 25, 2005.

Sincerely,

Debbie Davenport
Auditor General

Enclosure

TABLE OF CONTENTS



Introduction & Background 1

Finding 1: Actions needed to improve critical CPS data 5

Data problems impact CPS operations 5

Improvements to data integrity process could help improve data reliability 8

Improvements to Division's training program could help improve data reliability 11

Comprehensive review to streamline CPS work processes needed 14

Recommendations 18

Agency Response

Table:

1 Number of CPS Case Management and Support Positions Requested and Authorized Fiscal Years 2002 - 2005 15

Figure:

1 Number of Offices by District Fiscal Year 2004 1

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INTRODUCTION & BACKGROUND

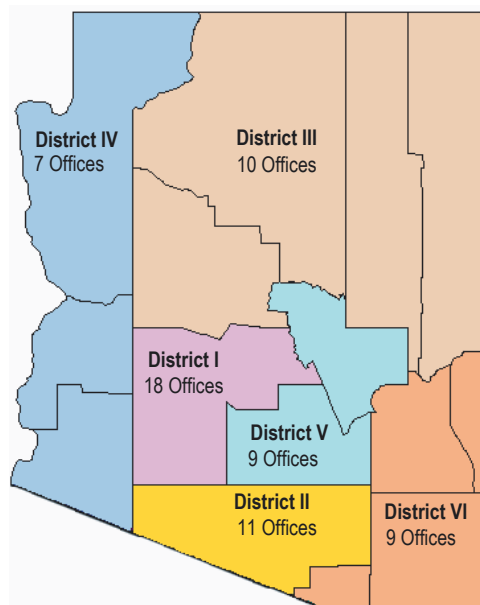
The Office of the Auditor General has conducted a performance audit of the process for ensuring the integrity of computerized child protective services data maintained on the Children's Information Library and Data Source (CHILDS) system. This audit was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1966.

Child Protective Services (CPS) is a program within the Department of Economic Security's Division of Children, Youth and Families (Division). The Division provides services to children and families, which includes protective services, family support and preservation services, foster care and kinship care services, adoption promotion and support services, child welfare services, and healthcare services. The majority of the Division's employees work within the CPS program. According to the Department, in fiscal year 2005, the Division had 1,793 authorized full-time equivalent (FTE) positions, of which 1,023 were CPS specialists and supervisors.¹ As of March 31, 2005, 107 of the 871 CPS specialist positions and 1 of the 152 supervisor positions were vacant. However, at the same time, there were also 91 staff undergoing training to fill the vacancies. CPS is organized into 64 offices within 6 regional districts (see Figure 1).

CHILDS supports CPS functions

In January 1998, the Division implemented a comprehensive case management computer system known as CHILDS. The system was intended to support CPS in its mission to provide services to children and families at risk by providing case

Figure 1: Number of Offices by District Fiscal Year 2004



Source: Auditor General staff analysis of the Division of Children, Youth and Families' Directory of Child Protective Services Offices.

¹ The 1,023 CPS specialist and supervisor FTEs do not include 47 FTEs allotted for CPS case manager trainees.

managers with timely and accurate information about their clients. Specifically, CHILDS contains information on the children involved in the child welfare system and providers of services to these children and their families, and supports the following functions:

- **Intake**, which involves screening and prioritizing calls from the public about suspected abuse or neglect. CHILDS is used to record information related to the calls, including the names of the alleged victim(s) and perpetrator(s) and their relationship to each other, the nature of the abuse or neglect allegation(s), a location where the victim(s) can be located, the name of the caller, and the time the call is received. The information entered in CHILDS is used by intake workers to decide whether an investigation is necessary. If so, the call is then ranked according to its seriousness and a decision is made about how quickly the investigation will begin.
- **Investigation**, which involves investigating calls regarding suspected child abuse or neglect and assessing whether services are needed to stabilize the family or protect the children. CHILDS is used to record information about the conditions that support or refute the alleged abuse or neglect, the risk of harm to the alleged victim(s) or other children in the home, and family strengths and weaknesses. The investigator uses this information to evaluate whether child abuse or neglect occurred and to determine if any services are needed to allow the children to remain safely in their home. However, if the children are in imminent danger of abuse or neglect, the CPS investigator may temporarily remove them from their home and place them in an approved foster care setting, such as with a relative or in a licensed foster or group home.
- **Case management**, which involves developing and monitoring a case plan focused on helping families address the problems that led to their abusing or neglecting their children. CHILDS is used to record the information in the plan including the case goal, objectives, tasks or services to be provided, persons responsible for completing the tasks or providing the services, and time frames. The case manager, parents, and others who are providing services to the family meet at least every 6 months until the case is closed to discuss progress, exchange ideas and suggestions, and work together to resolve family problems.
- **Eligibility determination**, which involves establishing whether children qualify for services funded through specific programs such as Title XIX, which provides medical assistance to those who have insufficient incomes. CHILDS is used to record required information needed to determine eligibility, such as household income and the children's legal status.
- **Resource management**, which involves maintaining and monitoring information on service providers. CHILDS is used to maintain a variety of information on service providers, including type of service(s) provided, contact information,

licensure or certification status, and client preference(s). CPS staff can review provider information to help ensure an appropriate provider/child match when placing children.

- **Financial management**, which involves tracking and managing financial transactions. CHILDS is used to record and track financial transactions, such as payments to foster care providers for the maintenance of children placed in their care, and for contracted services, such as counseling.
- **Other operational and management support components**, which include an online CPS policies and procedures manual; multiple forms that staff can edit, save, and print; and a variety of reports, including mandated state and federal reports and management and financial reports.

Although CPS case management staff are the primary users of CHILDS, various external entities also use this information. For example, the Attorney General's Office uses CHILDS data in representing the Department in court cases regarding abused or neglected children, or in making a case to sever parental rights so that the children can be adopted. The local Foster Care Review Boards also use CHILDS information to determine what efforts the Division has made to carry out the case plans for the permanent placement of children in out-of-home care.

CHILDS designed to meet federal child welfare information system requirements

Although not mandated, the Division designed CHILDS in accordance with federal regulations regarding state-wide automated child welfare information systems (SACWIS).¹ The regulations require these systems to be capable of 1) improving the administration of the State's adoption and foster care programs, 2) reporting data to the Adoption and Foster Care Analysis Reporting System and the National Child Abuse and Neglect Data System, and 3) interfacing with the State's Temporary Assistance for Needy Families (TANF) and child support automated systems. In addition, federal guidelines encouraged states to add complementary functionality to these systems, such as functionality that supports child protective and family preservation services, thereby providing a unified automated tool to support most, if not all, of the State's child welfare services. Because federal law provided funding for the development and operation of systems complying with SACWIS regulations,

¹ Arizona was the second state in the nation to complete the federal SACWIS assessment review according to the federal Administration for Children and Families. Although the original assessment was performed in 1998, the Department was notified in September 2004 that a few issues remain to be addressed before the system can be considered completely in compliance with federal expectations and requirements, including enhancing CHILDS' functionality for determining programs for which funding support is available for clients receiving services. Division personnel report that they are currently working on modifications to CHILDS to meet the remaining federal issues.

approximately 62 percent of CHILDS' development cost, which totaled \$32.8 million, was paid for with federal Title IV-E monies.¹ Further, approximately one-half of its annual operating costs, which amounted to \$1.7 million in fiscal year 2004, are also paid with federal Title IV-E dollars. The remainder is covered by state and other funds.²

According to the Department, CHILDS is supported by 5 consultants and 32 FTEs including an administrator, project manager, 2 project leaders, a tech systems architect, 16 management analysts, 10 programmers, and a clerk-typist. As of March 2005, 6 of the agency FTEs were vacant.

¹ The Omnibus Budget Reconciliation Act of 1993 authorized the use of an enhanced FFP (federal financial participation) rate of 75 percent to help states plan, design, develop, and install state-wide automated child welfare information systems that support the administration of services offered under their child welfare programs. The enhanced FFP was available initially from federal fiscal years 1994 through 1996 and subsequently extended through federal fiscal year 1997. After 1997, states have received a 50 percent match for system-related activities, including system operation.

² Annual operating costs included personnel, hardware, software, and other overhead.

FINDING 1

Actions needed to improve critical CPS data

The Division needs to improve its data integrity process and training program, and streamline its CPS processes to improve the reliability of data critical to CPS operations. The Division's computerized CPS case management system, known as CHILDS, contains data that is critical to the functions performed by CPS, but many CPS case management staff report concerns with data quality. The Division has implemented components of a data integrity process for CHILDS, but some components should be improved to increase their effectiveness. Further, improvements to the Division's training program should be made that could also help improve reliability. Finally, since workload was frequently cited as the reason why data is not accurate, timely, or complete, the Division needs to comprehensively review CPS work processes to identify and address those that can be streamlined or eliminated to help ensure that staff have sufficient time to maintain CHILDS data.

Data problems impact CPS operations

Although reliable data is critical in a comprehensive system such as CHILDS, 62 percent of CPS case management staff who responded to an auditors' survey indicated concerns with the accuracy, timeliness, and/or completeness of CHILDS data.¹ This data is used for a variety of purposes, including ensuring child safety and well-being, supporting effective and efficient agency operations, providing accountability, and supporting funding decisions. Specifically:

- **Child safety and well-being**—The ability to easily access thorough, up-to-date information is crucial in assessing and ensuring child safety and is helpful to after-hours and other staff addressing urgent situations when the assigned investigator is not available. Because the appropriateness of decisions made using case data is contingent on the data's quality, inaccurate or incomplete information may lead to poor or dangerous decisions.

¹ Auditor General staff surveyed 992 CPS specialists (i.e., case managers), supervisors, and program specialists between December 28, 2004, and January 11, 2005. Four hundred and twenty-five valid responses were received, for a response rate of 43 percent.

Thirteen percent of CPS case management staff responding to an auditors' survey (55 of 425) indicated that problems with CHILDS data hindered their ability to ensure child safety and well-being. Case management staff provided the following illustrative comments:

- Inability to assess past occurrences and services put in place has made it difficult for me to assess present situations and needed interventions, which leaves open the potential for leaving a child at risk or removing a child when possibly not needed.
 - I had a case transferred to me. I reviewed case information recorded in CHILDS and the hard copy file. I found no record to indicate that the child had any mental or physical issues that needed to be addressed. However, after several months went by, it was brought to my attention that the child did have mental issues that were not being treated.
- **CPS operations**—In the survey of CPS case management staff, 48 percent of the respondents (205 of the 425 respondents) indicated that problems with CHILDS data hindered their ability to efficiently and effectively perform their job duties. Several of the respondents' examples addressed how unreliable data: 1) hampered their ability to make informed case decisions, 2) caused delays in working cases, and 3) caused difficulties in locating case participants, including children and their families. The following comments are typical of examples case management staff provided:
 - Not having current data requires me to wade through hard files to locate court dates and results. Also, having people far behind on entering data, specifically case notes, makes it very difficult for anyone covering a case or taking over a case from another worker to know what has happened. When case managers enter case notes long after the fact, important details are lost and an accurate picture of the case is impossible. As an ongoing case manager, I know how difficult it is to stay current on case notes, but they are vital to being effective at a later time.
 - I work for the after-hours investigation unit. The data which is not entered in a timely manner by field workers makes it difficult to make decisions regarding emergency case activity.
 - Out-of-date addresses in CHILDS lead to not being able to locate families. Once a family wasn't located until about a month after the referral was made.

When CPS case management staff who auditors surveyed were asked whether CHILDS data could be relied upon for making good case management decisions, 42 percent of respondents (177 of 425) indicated that it could not.

Moreover, 77 percent of these respondents indicated that, as a result, they had to resort to using noncomputerized sources such as paper files, handwritten notes, and telephone calls on a daily basis or once or twice a week.

- **Program accountability**—CHILDS data is also used to monitor program accountability. For example, the federal Administration for Children and Families used CHILDS data to assess Arizona’s conformity with federal requirements for child protective, foster care, adoption, family preservation and family support, and independent living services.¹ The Division also uses CHILDS data to prepare its semiannual Child Welfare Reporting Requirements report, which is provided to the Governor and Legislature and includes information on child abuse and neglect investigations, types of services provided, and visitation compliance.

However, issues have been noted that impact the use of CHILDS data for accountability purposes. Internal and external reviews have noted concerns with missing or inaccurate data. These problems not only prevent an accurate assessment of the Division’s performance; in some instances, they may result in the Division’s performance being assessed as worse than it actually is. For example, internal reviews of the Division’s performance on certain federal outcome indicators noted that performance seemed to be declining despite corrective actions being taken. However, after the Division intensified its review process to include additional information from case managers, service providers, parents, children, and caregivers that was not contained in CHILDS, performance ratings on the outcomes indicators improved.

- **Funding decisions**—CHILDS data is used to support various funding decisions. The Department uses CHILDS data to supports its CPS budget requests to the Legislature and to obtain federal funds. For example, CHILDS client and caseload information was used to support the Department’s fiscal year 2006 request for \$20 million in General Fund appropriations for additional CPS case management and support staff, and \$14.5 million for children’s services.²

¹ The Division underwent its first federal Child and Family Services Review in 2001 and was required to develop and implement a program improvement plan (PIP) to address the areas of nonconformity, or it would sustain penalties as prescribed in federal regulations. In December 2004, the Department was notified that it was one of the first states in the nation to have successfully completed all provisions of its PIP and that all applicable penalties for nonconformity, totaling \$885,269, were rescinded.

² The division staffing request includes 292 case managers, 187 support staff (i.e., supervisors, case aides, secretaries, and program managers), 3 human services program development specialists, and 2 trainers.

Improvements to data integrity process could help improve data reliability

The Division has implemented several components of a sound data integrity process to help ensure that its automated CHILDS data is complete, accurate, and timely, but some components should be improved to increase their effectiveness. The components are grouped as follows: exception reports and monitoring, online alerts, and supervisory review. In each area, auditors found problems and identified enhancements that would help to improve data reliability.

Exceptions not resolved in a timely manner and monitoring not fully effective—Although the Division has designed a series of exception reports to identify errors and omissions in CHILDS data and created a District Automation Liaison (DAL) position in each of the regional districts to coordinate the related data monitoring and correction efforts, auditors' analyses of exception reports found that exceptions identified on some reports were not corrected in a timely manner. A number of factors limit the effectiveness of this process, including workload, a lack of policies and procedures and related performance measures, and inadequate DAL training. Specifically:

- **Exception reports**—The Division has approximately 26 exception reports that it uses to identify data omissions or data that deviates from expected results so that appropriate individuals can follow up and take needed corrective action.

Auditors analyzed five exception reports, which division DALs indicated were routinely monitored, and found that exceptions identified on four of these reports were not corrected in a timely manner.¹ For example:

- Division policy requires that a case manager record the investigation findings into CHILDS within 21 days of receiving a report of suspected abuse or neglect. Auditors' analysis of the missing investigation findings exception report found that over a 5-month period an average of more than 5,000 out of almost 7,400 cases identified per month were missing the required finding one month later. Moreover, auditors found that nearly 3,100 of these cases were still missing the required information 3 months later.
- Similarly, auditors' analysis of the exception report identifying cases that did not have a case note recorded within the last 60 days found similar results. Specifically, over a 6-month period an average of nearly 3,900 of the more than 5,000 cases identified on this exception report in 1 month were still missing the information the following month. Further, almost 3,000 of these cases were still missing the information after 3 months.

¹ Auditors reviewed the "AFCARS Exception," "Missing Findings," "Missing Dispositions," "Children with No Identified Placement," and "No Case Notes for 60 Days" reports ranging from June 2004 through January 2005.

The Division has not established formal policies and procedures outlining the roles and responsibilities of all staff involved with exception reports, nor has it established state-wide performance measures for correcting the problems listed in the reports. Some of the individual districts, however, have established some performance measures. For example, District III recently developed an action plan with specific performance measures to eliminate its backlog of open cases awaiting closure. The plan includes specific steps to complete the needed documentation on the cases awaiting closure and weekly goals, such as number of cases to close. District management monitors the number of open cases each month and follows up with the unit staff on how well they are meeting their goals. Further, District I has included measures in some of its performance evaluations to rate individual data correction efforts. For example, the deputy program managers are expected to follow up on the missing dispositions and findings reports to ensure that exceptions are corrected within 60 days.

- **District automation liaison (DAL)**—Although DALs in each district play a key role in coordinating data correction and monitoring, a number of factors keep them from being as effective as they could be. For example, the districts have assigned the DALs many additional responsibilities such as providing CHILDS technical assistance to case management staff, identifying and providing CHILDS user training, and evaluating hardware and software requirements and resources. Many of the DALs indicated that these other duties prevent them from completing their data monitoring and correction responsibilities in a more timely manner. In addition, a number of DALs indicated that the Division has not provided adequate training on how to perform their data monitoring and follow-up duties, including how to use some of the exception reports provided to them. To strengthen the DALs' effectiveness in monitoring and following up on data errors and omissions, both division and district management should evaluate the current DAL responsibilities and prioritize them, as appropriate. In addition, the Division should provide additional training to give the DALs a better understanding of how it expects them to perform their data monitoring and follow-up duties.

Online alerts not resolved in a timely manner—The Division has designed online alerts in CHILDS to notify case managers and supervisors of missing or erroneous data. However, auditors' analysis of online alerts found that many of the alerts were not being resolved in a timely manner. Workload was commonly cited by supervisors as a contributing problem. The Division's lack of formal online alert monitoring and correction policies and procedures, and related performance measures, keep the process from being as effective as it could be.

The Division has designed 38 online alerts, known as missing mandatory data alerts. Many of the online alerts identify errors and omissions that case managers and supervisors have made in case data used to make decisions about child safety and well-being, case planning and permanency, and services provided to the children

and families. The online alerts also address data needed to meet federal funding eligibility requirements and state and federal reporting requirements. Each time system users log onto CHILDS, they are notified of any conditions of missing or erroneous data in their cases that require corrective action. For example, division policy requires that a case manager record investigation findings into CHILDS within 21 days of receiving a report. Case managers will receive an online alert 15 days after getting the report to remind them to record the investigation findings. The online alert will remain until case managers record the investigation findings. To help ensure that case managers and supervisors take corrective action on their outstanding online alerts, unit supervisors and assistant program managers have the capability to review their staffs' outstanding online alerts.

Auditors analyzed online alerts issued to case managers and supervisors in December 2004. The alerts identified a variety of issues including notification that a child's case plan had not been recently updated, information on whether an investigation allegation had been substantiated was missing, and whether a required child safety assessment was missing. Auditors' analysis found that nearly 46 percent of the past due alerts (4,947 of 10,819 alerts) were more than 60 days past due, meaning that the problem identified had not been corrected within 60 days of when policy required the data to be entered into CHILDS. Auditors' analysis also found that 62 percent of the past due alerts (6,760 of 10,819) were 30 or more days past due. Additionally, auditors found that 36 case managers and supervisors had 85 alerts each, the maximum number that can be recorded in CHILDS, while an additional 34 case managers and supervisors had 50 or more alerts.¹

Although the unit supervisors have the ability to monitor these online alerts, several supervisors indicated that their workload, as well as case manager workload, hinders their ability to resolve online alerts in a timely manner. Additionally, the Division has not established formal online alert monitoring and resolution policies and procedures that identify the roles and responsibilities of all individuals involved in this process or performance measures to help monitor and evaluate those efforts' effectiveness.

Supervisory review not completed for many cases—While supervisory review helps to ensure CHILDS data is complete and accurate, the Division's internal peer record reviews found that supervisor case record reviews are not being completed for about half of the cases. Supervisors indicated that workload and the time it takes to complete the reviews are barriers to completing them as division policy requires.

Supervisory review is designed to monitor case activity at key decision points, to monitor service plan implementation and the appropriateness of services, and to ensure consistency of policy application, documentation, and recordkeeping. For example, supervisors are required to review case activity and to ensure that certain information in CHILDS is complete and accurate at the time of case transfer and case closure, and at least once every 6 months for ongoing cases. The Division has

¹ Once the maximum number of online alerts is reached, any subsequent alerts are not accumulated or presented.

developed supervisory case record review guides to assist supervisors in performing these reviews. For example, these guides require that supervisors ensure that the child safety assessment, the family strengths and risk assessment, and the investigation findings have been properly recorded in CHILDS.

Auditors determined what percentage of cases had been reviewed by examining the Division's internal peer record review reports for the quarters ended June 30, 2002 through June 30, 2004.¹ Auditors found that the supervisory case record review guide was not completed in an average of 51 percent of the cases reviewed. Supervisors cited their workloads and the time it takes to complete the case record review guides as barriers to completing them.

According to division management, the Division has recently received authorization to develop a new computer reporting tool to enhance CHILDS' reporting and supervisory monitoring capabilities. Initially, the tool will be used to provide supervisors the ability to monitor and help ensure that visitations are performed, reports are investigated, and investigations are completed in a timely manner. The tool also will provide district and division management with the capability to monitor the Division's overall progress toward meeting its objectives. Ultimately, the Division plans to use this tool for future CHILDS report development. According to division management, the Division plans to develop and implement the initial phase of this new tool by June 2005.

Improvements to Division's training program could help improve data reliability

In addition to the components of a sound data integrity process mentioned above, training is also a key element of the Division's data reliability efforts. The Division provides core training to new case managers and ongoing training to existing staff and is in the process of enhancing its training efforts. However, because several concerns with the training program still exist, additional changes should be made that could help improve data reliability.

Division training provided to caseworkers—The Division has identified its training program as another key element of its data integrity process. In addition to providing core training to its case managers, the training program is intended to help minimize data entry errors by providing workers with information about, and experience working with, CHILDS. The Division provides case manager core training to new case managers and includes material on how to use CHILDS to administer

¹ The Division's quarterly peer record review examines a sample of cases across the State and assesses them on several measures addressing child safety, permanency, well-being, documentation, and supervision. Its goal is to identify strengths and areas needing improvement within the State's child welfare system, including supervisory review, and is accomplished through reviews of case records and telephone interviews with case participants on selected in-home and out-of-home cases.

cases. Case managers simulate practical experiences in a computer lab by inputting child welfare case information into the CHILDS training module. Once the case managers are assigned to the field, the field training supervisors and unit supervisors are responsible for monitoring and assessing the case managers' CHILDS training needs and ensuring that appropriate CHILDS field training is provided to them. The Division also provides CHILDS refresher training to its case managers as needed and to its supervisors upon request.

Improvements to training program needed—Some CPS caseworkers and supervisors indicate that problems with the training program are affecting data quality. For example, 23 percent (97 of 425) of case management staff who responded to the auditors' survey indicated that inadequate training impacted their ability to maintain up-to-date, complete, and accurate CHILDS data. Auditors' interviews with several case managers who had completed the training program between January 2004 and August 2004, and with several unit supervisors, indicated that training concerns primarily related to inconsistency in field training between districts and insufficient refresher training. Although the Division has been working to improve its training program, these problems still exist. Additionally, while the Division has not had an effective assessment tool to measure the training program's success, it recently developed one and is in the first year of administering the tool to determine whether case managers have demonstrated increased skills and knowledge development. Specifically:

- **Inconsistent field training**—A 2003 Auditor General report on CPS caseloads and training noted that field training differed from trainee to trainee and recommended that the Division continue to take steps to ensure that the field portion of training is implemented consistently state-wide (see Report No. 03-09). Auditors' interviews with new training program graduates and supervisors found that CHILDS field training continues to be inconsistent. For example, one case manager indicated that her field training supervisor and unit supervisor spent a considerable amount of time assisting her with CHILDS field training to ensure that she understood how to perform her duties and use CHILDS. But another case manager indicated that the extent of her CHILDS field training consisted of her unit supervisor referring her to the CHILDS user manual and directing her to do her job. The Governor's Office action plan for CPS reform includes consistent implementation of training state-wide as one of its goals.¹ According to the Division, it is redesigning its training program in response to the Governor's action plan. The planned revisions include evaluating the consistency of field training throughout the State, developing an action plan to make the field training more consistent state-wide, and implementing the plan by July 2005.

¹ Governor's Office. *Action Plan for Reform of Arizona's Child Protection System*. Action 5.3, Sept. 2003.

- **Insufficient refresher training**—The Division provides CHILDS refresher training to case managers as needed and to supervisors upon request. However, auditors’ interviews with case managers and supervisors found that they want more CHILDS training to address the ongoing enhancements and program changes to CHILDS. Some case management staff also suggested that these trainings should be provided at least quarterly or semiannually. Case management staff expressed similar concerns in the auditors’ survey. For example, among the comments auditors received were the following:
 - CHILDS changes frequently and case managers are not trained in the new windows, so the new additions are not always completed or completed correctly.
 - We have a tendency to change and revise our system over and over without proper training.

CPS staff indicated that concerns with workload impacted their ability to provide or attend refresher trainings. Specifically, one trainer indicated that workload did not allow the Division to provide regularly scheduled CHILDS refresher trainings. Similarly, two case management staff indicated that although the refresher training is a good idea, because of their workloads, they avoid attending it for fear they would develop a data entry backlog on their cases.

The Governor’s Office action plan for CPS reform includes a recommendation for providing continuing professional education to all CPS staff. As part of this continuing education, the Division should provide mandatory refresher trainings focused on significant changes to CHILDS.

- **Assessment tool is being implemented**—Until recently, the Division did not have an assessment tool to determine whether case manager classroom and field training was effective and the skills and knowledge were transferred to the job. As part of its redesign of the case manager training, the Division developed an assessment tool and in February 2005 began administering it. The Division plans to administer the tool four times during the case managers’ first year with CPS. The first and second assessments will be administered prior to and upon completion of the core classroom training, and the remaining assessments will be administered by the field training supervisor and unit supervisor during the remainder of the year. The Division should use the results to further revise and enhance its training.

Comprehensive review to streamline CPS work processes needed

To better ensure CHILDS data reliability, the Division will also need to address case management staff's workload concerns. Throughout auditors' review of the Division's data integrity process, staff frequently cited difficulty managing workload as a barrier to entering complete and timely information into CHILDS and to the effective implementation of the Division's data integrity processes. Although the Division has taken some actions to help address workload concerns, it can further expand its effort by conducting a comprehensive analysis of all CPS work processes to address those that can be streamlined or eliminated.

Workload frequently cited by staff as a barrier to data reliability—

Difficulty managing workload is often cited by case management staff as impacting their ability to enter case data into CHILDS. For example, in an auditors' survey, 80 percent of respondents (338 of 425) indicated that workload impacted their ability to maintain up-to-date, complete, and accurate CHILDS data. As one respondent explained:

- CHILDS data is limited because of the time available to enter the data. We are not documenting incidents verbatim because we do not have the time to do this. There are important issues that are not being entered into CHILDS because there is not enough time.

Division management indicated that they understand the need for complete, accurate, and timely data; however, because of workload concerns, they have notified case management staff that documenting information in CHILDS is a secondary priority to ensuring child safety. While some staff expressed a similar view in their survey comments, some also acknowledged the risk associated with this view. For example, another respondent explained:

- I make a choice to lag on entering data to address child safety issues and provide the services families and children need. Therefore, if you have questions on my cases, don't think you can get a "picture" from CHILDS. However, we all know that if it is not documented, it didn't happen, so this is a HUGE risk for the agency.

Staff also cited difficulty managing workload as impacting the effectiveness of some of the Division's data integrity mechanisms. For example, district DALs and CPS supervisors indicated that workload limited their availability to monitor and follow up on needed data correction. Likewise, CPS staff indicated that workload impacted their ability to provide or attend CHILDS refresher trainings.

Division can further expand current efforts to help workers better manage workload—Although the Division has taken actions to help case management staff manage their workload, including requesting additional CPS staff, establishing internal workgroups to identify ways to streamline case management tasks, and having a process to update CHILDS to meet state and federal mandates and user needs, it should expand its efforts. Specifically, the Division has:

- Requested additional CPS staff**—The Division has requested authorization from the Legislature for additional CPS case management and support positions to address staff workload concerns. For example, the Department’s fiscal year 2006 budget decision package requests an additional 292 CPS case managers and 187 support staff. The number of CPS case management and support positions the Division requested and the Legislature authorized between fiscal years 2002 and 2005 is presented in Table 1.

However, additional staffing is not the only answer to help resolve workload issues. In April 2004, the Division established a workgroup to develop an investigative caseload standard.¹ The workgroup determined that, given all of the tasks and activities an investigator should perform, an investigator would only be able to investigate 2.4 cases per month, assuming a mix of cases.^{2,3} However, the current Child Welfare League of America investigative caseload standard is 12 cases per month. Therefore, part of the solution must lie with changing factors that affect case management staff’s ability to manage their workload.

- Made efforts to streamline work**—The Division formed two workgroups charged with developing recommendations for reducing CPS case management staff’s tasks while still ensuring children’s safety. The workgroups were intended to be of a limited duration and composed of CPS case managers and supervisors, division policy and CHILDS staff, and representatives from the Attorney General’s Office. One workgroup focused on the investigation function and the other focused on the ongoing casework function. Workgroup members were asked to solicit and provide feedback to their coworkers regarding potential areas for streamlining CPS work.

Table 1: Number of CPS Case Management and Support Positions Requested and Authorized Fiscal Years 2002-2005¹

Fiscal Year	Staff Requested by Division	Staff Authorized by Legislature
2002 ²	137	104
2003 ²	-	-
2004 ³	235	160
2005	366	75

¹ Adoption staffing positions are not included in the information presented in this table.
² Fiscal year 2002 and 2003 staffing requests submitted in fiscal year 2002 as a 2-year request.
³ FTEs were requested and received through special session.

Source: Auditor General staff analysis of the Department of Economic Security *Schedule 3DP-Decision Package Justification* for fiscal years 2002 and 2003 prepared September 1, 2000; fiscal year 2004 prepared September 20, 2002; and fiscal year 2005 prepared December 1, 2003, provided by the Division, and the *State of Arizona Appropriations Reports* for fiscal years 2002 through 2005.

1 National Resource Center on Child Maltreatment. *Final Report of the Investigation Caseload Standard Workgroup*. Albuquerque: National Resource Center on Child Maltreatment. July 2004.

2 The standard is based on the following mix of cases: 1) Cases that close once the investigation is completed with no services being provided (55 percent of the standard), 2) Cases that remain open for up to 3 months following completion of the investigation so that services can be provided (30 percent of the standard), and 3) Cases where a dependency petition is filed with the court (15 percent of the standard).

3 The investigative caseload standard this group developed for Arizona ranged from a low of 1.2 cases per month if all the cases involved a dependency petition being filed to 3.8 cases if the cases were closed after the investigation was completed with no services being provided.

The two workgroups developed various recommendations addressing the investigative and ongoing case management functions. For example,

- The investigative workgroup, which began meeting in November 2002, provided division management with a list of 16 recommendations in March 2003, including streamlining paperwork for kinship care cases and giving CPS supervisors discretion to waive investigator interviews with parents or adults who do not reside in the home of the child(ren). According to division staff, while the majority of the recommendations were implemented in May 2003, a few were never followed through on and completed. For example, the workgroup recommended the family history and social history forms be combined to eliminate duplicative data entry. However, although staff developed a combined form, it was never uploaded onto CHILDS.
- The ongoing case management workgroup, which began meeting in September 2003, provided division management with a list of six recommendations in June 2004, including streamlining the format of court reports and modifying CHILDS to improve its functionality. Division staff indicated that the majority of the recommendations are in the process of being implemented. For example, division staff are currently working with staff from the Office of the Attorney General to streamline the format of various court reports. In addition, the Division plans to implement a number of changes to improve CHILDS functionality during regular system update cycles scheduled throughout 2005.

However, while the workgroups made several recommendations to help streamline work, more can be done. For example, the workgroups focused only on those processes in the investigative and ongoing case management areas, thus excluding processes in other critical areas such as intake, which involves receiving and screening calls of suspected child abuse and neglect. Moreover, according to workgroup participants, they did not perform a comprehensive review of all the work processes impacting the investigations and ongoing case work areas. Further, while the Division develops processes to be implemented state-wide, each district may also develop additional processes that take into account factors unique to them, such as dispersion of their client population, available staff resources, etc. Yet the workgroups focused only on the state-wide processes. A more comprehensive review of all CPS processes, both at the state-wide and district level, may have identified other areas where efficiencies could have been realized. Therefore, the Division should conduct such a comprehensive review.

Other agencies and states have initiated reviews of their processes to identify ways to streamline work. For example, in 2002 the Arizona Department of Health Services implemented an initiative to streamline the intake and assessment process for persons receiving behavioral health services. This resulted in

improved engagement of clients in treatment while reducing contractors' required paperwork by 3.3 million sheets, thus saving them 99,981 staff hours devoted to paperwork annually.¹ In addition, in 2004 the Iowa Department of Human Services contracted with the Center for the Support of Families, Inc. of Silver Spring, Maryland, to streamline its entire CPS documentation process. About half of the money for the \$486,000 contract came from a federal match, with the rest coming from monies set aside by the legislature when it ordered the redesign of Iowa's child welfare system.

The Governor's Office CPS reform plan also directs that CPS streamline its case management process, eliminate unproductive tasks, and assign appropriate tasks to support workers.

- **Modified CHILDS to better meet users' needs**—The Division has a process in place to update CHILDS to meet state and federal mandates and user needs. Through the process, ideas for enhancing and streamlining CHILDS are gathered on an ongoing basis from system users. The proposed changes are prioritized by division management and some are assigned for programming and implementation into CHILDS each quarter. The number of changes implemented in any one quarter is dependent on their complexity and the availability of resources to make the programming changes.

However, despite this process, some case management staff indicated concerns with the functionality and user-friendliness of CHILDS. Thirty-seven percent of respondents (159 of 425) to an auditors' survey indicated that the complexity of CHILDS impacted their ability to maintain reliable CHILDS data. This applied to both new as well as experienced workers. Specifically, respondents said that they had to spend additional/excessive time on their CHILDS data entry because of inefficiencies in how they had to navigate through the system, having to enter the same data multiple times, and so on. Following are some typical examples of case management staff comments:

- There are many investigation windows that are repetitive. We copy and paste the same information into several windows. This seems like a waste of time. It is time-consuming to get to some of the windows that are "deep" into CHILDS, i.e., you can only get to some windows by going through several other windows first.
- CHILDS is very nonuser friendly. We shouldn't have to constantly open and close out windows to go from one operation to another. This uses so much time that it doubles the time spent entering information. We should be able to go from window to window or have more than one window open to work in without opening and closing and going back to main windows to get to appropriate windows for data entry. This seems like a simple programming

¹ Office of the Governor. State of Arizona Efficiency Review. *Creating a More Efficient State Government: From Analysis to Action*. Phoenix: Office of the Governor. Dec. 2003.

function to implement and should be done to save the State lots of money on wasted time.

Staff's concerns with data entry requirements and CHILDS complexity are not new. In 2001, the Division underwent a federal review, which found that, among other things, there was a need to reduce the amount of time case management staff spend entering data into CHILDS and a need to simplify the flow of CHILDS program windows to improve ease of use.¹

The Division indicates that it has scheduled some changes for CHILDS in 2005 that should help facilitate easier navigation of CHILDS and reduce data entry requirements. For example, a change is scheduled for implementation that will allow workers to go from one location in CHILDS to another without having to sequentially move through several windows. Another change, scheduled for June 2005, will pre-populate some fields of information in the "child safety assessment" to prevent redundant data entry. The Division anticipates that this will save staff hours of work on a weekly basis. The Division should continue to look for ways to further improve CHILDS' functionality and user-friendliness.

Recommendations

1. The Division should develop formal division-wide data monitoring and correction policies and procedures that
 - a. identify the roles and responsibilities of all individuals involved in the exception reports and online alerts,
 - b. develop performance measures for timely exception report data correction and online alert resolution, and
 - c. provide for monitoring staff's performance.
2. Division and district management should evaluate district automation liaisons' (DAL) duties and prioritize them, as appropriate. In addition, the Division should provide additional training to give the DALs a better understanding of how it expects them to perform their data monitoring and follow-up responsibilities.

¹ U.S. Department of Health and Human Services. *Arizona Child and Family Services Review Final Report*. San Francisco: DHHS, Feb. 2002.

3. The Division should explore ways to streamline the case record review process and make it more efficient and strengthen the effectiveness of supervisory review for ensuring quality case data.
4. The Division should evaluate the consistency of CHILDS field training throughout the State, develop an action plan to make field training more consistent state-wide, and implement the plan by July 2005.
5. As part of the continuing professional education recommended by the Governor's Office action plan, the Division should provide mandatory refresher trainings focused on significant changes to CHILDS.
6. The Division should administer its training assessment tool at least four times within the first year of doing so, determine if the skills and knowledge that case managers learn during classroom and field training are transferred to the job, and revise and enhance its training based on the results.
7. To help division staff better manage their workloads, the Division should:
 - a. Conduct a comprehensive and systematic review of all its CPS processes to identify and address those processes that can be streamlined or eliminated.
 - b. Implement the CHILDS changes, scheduled for 2005, to facilitate easier navigation of CHILDS and to reduce data entry requirements, and review the process it uses to identify and implement additional changes that would further improve CHILDS' functionality and user-friendliness.

AGENCY RESPONSE



ARIZONA DEPARTMENT OF ECONOMIC SECURITY

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Janet Napolitano
Governor

David A. Berns
Director

May 19, 2005

Debra K. Davenport, CPA
Auditor General
2910 North 44th Street Suite 410
Phoenix, AZ 85018

Dear Ms. Davenport:

The Office of the Auditor General provided a revised preliminary draft report of the performance audit of the Department of Economic Security, Division of Children, Youth and Families (DCYF), Data Integrity Process on May 12, 2005. Following is the Department's response to the seven recommendations that were made.

Recommendation 1:

The Division should develop formal division-wide data monitoring and correction policies and procedures that:

- a. Identify the roles and responsibilities of all individuals involved in the exception reports and online alerts;
- b. Develop performance measures for timely exception report data correction and online alert resolution; and
- c. Provide for monitoring staff's performance.

DES Response:

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

The Division will work with the six district program managers, the six district automation liaisons, the six district practice improvement specialists, the reports and statistics staff and the CHILDS automation team to develop corrective policies and procedures. Included as part of the policies and procedures, we will be defining staff's roles and responsibilities with regards to the exception reports and the online reports. The procedures will include performance measures for the timely exception report data and online alert resolution which will allow for monitoring of staff's performance.

Recommendation 2:

Division and district management should evaluate district automation liaisons' (DAL) duties and prioritize them, as appropriate. In addition, the Division should provide additional training to give the

DAL's a better understanding of how it expects them to perform their data monitoring and follow-up responsibilities.

DES Response:

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

The Division has already started to evaluate the duties of the district automation liaisons. Currently, the six district automation liaisons are updating their Position Description Questionnaire (PDQ's) and will be working on developing new performance expectations for their positions.

In addition, the Division is working with our National Resource Center to provide some training to our district automation liaisons, district practice improvement specialist and our reports and statistics staff.

Recommendation 3:

The Division should explore ways to streamline the case record review process and make it more efficient and strengthen the effectiveness of supervisory review for ensuring quality case data.

DES Response:

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

The State's Practice Improvement Case Review (formerly Peer Record Review) was significantly changed beginning with the July 2004 review. The new Practice Improvement Case Review process differs from the former Peer Record Review in the following ways:

- The period from which cases are randomly selected and the period under review are more current, so the information gathered describes current practice.
- Each district participates in a case review annually, as opposed to the prior schedule of quarterly statewide reviews. This schedule gives districts more time to analyze data and make improvements between reviews.
- The number of cases reviewed has been adjusted to be both manageable and informative. In rural districts, the number of cases reviewed increased from four to fifteen of each case type. Twenty cases of each type will be reviewed in District II (Tucson), and thirty of each type will be reviewed in District I (Phoenix/Maricopa County).
- The Practice Improvement Case Review Instruments were revised to include greater rating standard guidance. The instruments continue to include the items and instructions from the CFSR On-Site Review Instrument. Guidance based on State policy and best practices has been added to clarify when a case should be rated strength versus area needing improvement.
- The initial review of each case can be conducted by any DCYF district or central office employee, including case managers, supervisors, policy specialists, or program managers. Expanding the pool of reviewers allows the workload to be shared, and allows a greater number of staff to become familiar with the outcomes and practice standards assessed during the case review. The initial review also provides opportunities for supervisors to increase their knowledge about case review and worker expectations.
- The hard copy records are reviewed and all item ratings are finalized during an on-site review week. In advance of the on-site review week, staff search the automated record and contact

case participants to fill gaps in the initial review and read the completed instruments to ensure accuracy and consistent application of the rating standards. At the end of the on-site review, the district is provided the final data and an exit teleconference is held to discuss the findings and begin the practice improvement plan phase. This process provides the district immediate feedback and provides maximum time for action planning and practice improvement.

- Following the on-site review week, the district develops a practice improvement plan to address areas needing improvement identified during the case review. These plans are developed with district case-carrying staff input, using the CQI Team process and other staff meetings. Implementation of each district practice improvement plan is monitored by a district Practice Improvement Specialist, who reports progress and barriers to central office practice improvement staff.

In addition to revising its case record review process, from March to May 2005, the Division provided a series of three (3) Critical Decision-Making Seminars to all supervisors and others through the National Resource Center for Child Maltreatment. The purpose of the seminars was to provide key safety decision-making concepts and processes and enhance supervisors' abilities to coach their staff in the safety decision-making process. The seminars were led using case examples developed by the trainer and case examples submitted by the participants. In addition, Training of Trainer sessions were held to enable the Division to further enhance Critical Decision-Making skills and practice with supervisors and staff.

The Division will explore other ways to strengthen the effectiveness of supervisory review for ensuring quality case data. This will include exploring the feasibility of using the new computer reporting tool referred to in the Auditor General's draft report; assessing other automated options for supervisors to obtain needed information to monitor critical case data; determining the possibility of streamlining the process to make supervisory review more efficient; and, assessing whether additional training of supervisors in the completion of the record review tool will increase the completion rate.

Recommendation 4:

The Division should evaluate the consistency of CHILDS field training throughout the State, develop an action plan to make field training more consistent state-wide, and implement the plan by July 2005.

DES Response:

The finding of the Auditor General is agreed to. The same method of dealing with the finding will be implemented; however, the date for implementation will be September 2005.

Recommendation 5:

As part of the continuing professional education recommended by the Governor's Office action plan, the Division should provide mandatory refresher trainings focused on significant changes to CHILDS.

DES Response:

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

Recommendation 6:

The Division should administer its training assessment tool at least four times within the first year of doing so, determine if the skills and knowledge that case managers learn during classroom and field training are transferred to the job, and revise and enhance its training based on the results.

DES Response:

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

Recommendation 7:

To help division staff better manage their workloads, the Division should:

- a. Conduct a comprehensive and systematic review of all its CPS processes to identify and address processes that can be streamlined or eliminated.
- b. Implement the CHILDS changes, scheduled for 2005, to facilitate easier navigation of CHILDS and to reduce data entry requirements, and review the process it uses to identify and implement additional changes that would further improve CHILDS' functionality and user-friendliness.

DES Response:

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

The Division will develop a plan for a comprehensive and systematic review of its CPS processes in coordination with its current plans for a comprehensive review and revision of its CPS processes to include family centered principles and practices.

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

The Division has already completed some of the changes in CHILDS scheduled for 2005 and will continue to review and implement changes throughout the year.

The Division will review the process it uses to identify and implement additional changes to CHILDS.

The Department of Economic Security appreciates the opportunity to respond to the recommendations contained in the Auditor General's Report. If you have any questions, please contact Mary Lou Hanley, Deputy Director for the Division of Children, Youth and Families at (602) 542-3598, or me at (602) 542-5678.

Sincerely,

David A. Berns

CPS Performance Audits and Information Briefs Issued

IB-0401 Federal IV-E Waiver Demonstration Project Proposal

Future CPS Performance Audits

Investigation Rates and Timeliness
Caseworker and Supervisor Training

Future CPS Information Briefs

Family Foster Care Homes and Placements
Impact of Revenue Maximization
Types of Federal Monies Available