



ARIZONA DEPARTMENT OF ECONOMIC SECURITY

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

Janet Napolitano
Governor

David A. Berns
Director

December 14, 2005

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

Dear Ms. Davenport:

The Department of Economic Security is pleased to provide the following comments to supplement the CPS Investigations Performance Audit conducted by your office.

The rights of children to remain safe and in the care of their parents are among the most fundamental. Child Protective Services protects children by investigating allegations of abuse and neglect, promoting the well-being of children in permanent homes, and coordinating services to strengthen families. The Department takes its mission seriously and appreciates the work of your office in identifying areas of practice requiring improvement, including investigation response time and timely date entry into the case management information system.

The Audit conducted by your office covers a thirty-three month time period, specifically from July 1, 2002 through March 31, 2005. During this almost three year period, our Department's Child Protective Services (CPS) received 91,267 CPS reports and assigned one hundred percent (91,267) of these reports for investigation. As you have acknowledged in your report, there has been a 27 percent increase in the number of reports received and assigned for investigation by CPS (from 29,290 reports in 2003 to 37,170 reports in 2005).

Your office reviewed a computer report that identified cases in the database that were missing two data elements: CPS response time and after investigation findings. Of the 91,267 reports assigned during this period, you found 920 CPS reports, (1 percent of the total number of CPS reports reviewed) that were missing these two data elements. This missing information in the computer system raises questions as to whether investigations had occurred for those reports. Your office selected 15 of those reports, reviewed additional electronic and paper records, and found that 3 of the 15 reports had not been investigated.

To ensure child safety, the Division reviewed the electronic and paper files of all 920 reports and determined that of the 920, an additional eight (8) reports had not been investigated. Investigators were immediately instructed to locate the families involved and complete safety and risk assessments of the children. In all but one case, investigators were able to locate the families and take steps to ensure the children's safety. In the remaining case, the child had turned 18 since the report had been received.

This Audit reinforced for the Department the findings of your office's recent report issued in May 2005, CHILDS Data Integrity Process, which identified the need for more timely CPS data entry into the case management information system. The Department is aggressively pursuing strategies to improve timely data entry, including continual modification of the case management information system to make it more efficient and easier to use and the implementation of a Business Intelligence Dashboard which allows management, supervisors and CPS staff to view collected data, analyze trends, and most importantly, monitor performance. CPS has prioritized the following for the initial data display for this new automated tool: response time for CPS investigations, timeliness of CPS investigations, and timeliness for case manager visitation with children and families.

The Audit also found that many CPS reports were not responded to within the timeframes established by our child welfare policy. Our policy was established to assist CPS supervisors and workers in prioritizing their response to all the CPS reports that have been assigned for investigation. Based upon additional information obtained by CPS, such as from the reporting source, hospital personnel, or law enforcement, CPS may determine that the child is safe and prioritize another CPS report for response, when the safety of that alleged child victim is unknown. This may result in an investigation being considered untimely according to our policy, but better ensures that children are safe.

CPS workers are committed to providing timely and quality investigations. The increased number of CPS reports that have been assigned for investigation over the past several years have impacted investigation timeliness and data integrity. In addition, staff turnover and vacancies have increased caseloads in some offices of the state. The Department is working diligently to implement strategies to improve the recruitment and retention of CPS staff, including participation in the Western Region Recruitment and Retention project headed by the University of Denver.

I have also directed CPS to review our:

- Quality Assurance processes to ensure that the CPS investigation process, including timeliness of initiating investigations, completion of after-investigation findings, and thoroughness of investigation, are reviewed and assessed on an ongoing basis.
- District tools used to monitor investigation status to ensure all areas of key activity are being captured until all elements can be tracked automatically in the Business Intelligence Dashboard.

We are committed to continued practice improvements, particularly as to data integrity, retention of CPS staff and supervisors, and the quality and availability of CPS training. All of these efforts will improve our investigation practice and documentation of those investigations in the case management information system.

We are providing an attachment which addresses our plans for implementing the recommendations suggested by your office. Please feel free to contact me at (602) 542-5678, or Tracy Wareing, Acting Deputy Director, Division of Children, Youth and Families, at (602) 542-3598.

Sincerely,

David A. Berns

David A. Berns

Attachment

**DEPARTMENT OF ECONOMIC SECURITY
RESPONSE TO AUDITOR GENERAL'S REPORT
CHILD PROTECTIVE SERVICES PERFORMANCE AUDIT
DECEMBER 14, 2005**

The Department of Economic Security (Department) is providing the following comments and responses to the finding and recommendations of the Office of the Auditor General's performance audit of Division of Children, Youth and Families' (Division) Child Protective Services (CPS) Investigations.

The rights of children to remain safe and in the care of their parents are among the most fundamental. Child Protective Services protects children by investigating allegations of abuse and neglect, promoting the well-being of children in permanent homes, and coordinating services to strengthen families. The Department takes its mission seriously and appreciates the work of the Auditor General in identifying areas of practice requiring improvement, including investigation response time and timely date entry into the case management information system.

Because audits may guide public policy discussions and decisions, it is important to understand the full context of the total number of CPS reports that were received and assigned for investigation during this review period. The Auditor General conducted an audit that covers a thirty-three month time period, specifically from July 1, 2002 through March 31, 2005. During this almost three year period, CPS received 91,267 CPS reports and assigned one hundred percent (91,267) of these reports for investigation. CPS was able to complete investigations on over 99.99 percent of these assigned 91,267 reports. As the Auditor General acknowledged, there has been a 27 percent increase in the number of reports received and assigned for investigation by CPS (from 29,290 reports in 2003 to 37,170 reports in 2005).

The Auditor General reviewed a computer report that identified cases in the database that were missing two data elements: CPS response time and after investigation findings. The Auditor General found 920 CPS reports, 1 percent of the total number of CPS reports reviewed, that were missing these two data elements and questioned whether investigations had occurred for those reports. Based upon that finding, the Auditor General selected 15 of those reports, reviewed additional electronic and paper records, and found that 3 of the 15 reports had not been investigated.

To ensure child safety, the Division reviewed the electronic and paper files of all 920 reports and determined that of the 920, an additional eight (8) reports had not been investigated. Investigators were immediately instructed to locate the families involved and complete safety and risk assessments of the children. In all but one case, investigators were able to locate the families and take steps to ensure the children's safety. In the remaining case, the child had turned 18 since the report had been received.

The Auditor General notes that the Division does not always initiate investigations within the required timeframes. These timeframes were established to assist CPS supervisors and workers in prioritizing CPS reports received and assigned for investigation. The Auditor General found that 54 percent of the CPS investigations were responded to within the required timeframes and 12 percent were not responded to within the required timeframes. The timeliness of the response in the remaining 34 percent of cases could not be determined, although investigations were completed in all those cases. For the cases that were not responded to within the required timeframes, 6,905 or 61 percent were identified as potential or low risk reports; 3,185 or 28 percent missed the timeliness standard by one day or less and an additional 4,185 or 37 percent missed the timeliness standard by 2 to 5 days.

The Division's paramount concern is child safety. CPS supervisors and workers prioritize the order in which CPS reports will be responded to from the information received from the statewide hotline and information about the child's immediate safety received from a variety of sources contacted after the report is received. These include, but are not limited to; the reporting source, which may provide additional information; the hospital, to determine a discharge date for a child that is hospitalized; and, when law enforcement has made the initial response, the officers responding that have information about the child's safety. Although these steps help to ensure child safety, these contacts are not considered the initial CPS response according to the Division's child welfare policy and its database system. If the child is determined safe, these initial actions allow CPS to prioritize other investigations that have been assigned, ones in which child safety cannot be determined through additional contact with others.

Many of the findings in this most recent Auditor General's report mirror findings in the Auditor's May 2005 report on the CHILDS Data Integrity Process. CPS staff are committed to providing timely and quality investigations. The increased number of CPS reports that are assigned for investigation impact investigation timeliness and data integrity. To address the issues raised in the May 2005 audit, the Department has committed to making practice improvements and increasing data integrity. In addition, the Department is pursuing strategies to improve the recruitment and retention of CPS supervisors and workers, and to increasing the quality and availability of CPS training. All of these efforts will improve CPS investigation practice and documentation of those investigations in the case management information system.

One example of these solutions, which will be implemented in January 2006, is the statewide use of a user-friendly on-line reporting tool (Business Intelligence Dashboard) which allows management, supervisors and CPS staff to view collected data, analyze trends, and most importantly, monitor performance from the statewide level down to the worker level. The Division has prioritized the following for the initial data display for this new automated tool: response time for CPS investigations, timeliness of CPS investigations, and timeliness for case manager visitation with children and families. Additional data elements will be added after full implementation of this reporting tool.

The Department's specific response to the Auditor General's finding and recommendations follow in the next section.

RESPONSE TO REPORT FINDING AND RECOMMENDATIONS

The Department's response to the Auditor General finding and recommendations includes strategies that the Division is currently implementing or will begin implementing. Many of these strategies include modifications to the Division's case management information system. The Division will begin immediately to pursue the numerous steps necessary to modify an automated system. These modifications will be made on an aggressive schedule in order to implement the agreed upon recommendations of the Auditor General.

Recommendation 1:

To ensure the Division's reported investigation rate accurately reflects investigated reports, the Division should base the rate on the number of CPS reports received that have findings for all allegations and for which the supervisor has reviewed and approved the findings. This will require a modification to the automated case management system to capture supervisor approval of each of the allegation findings.

DES Response 1:

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

The Division currently reports on the number of communications that meet the criteria of a report and the number of those reports which have been dispositioned (assigned to a case worker) for investigation. The Division will modify the report to include the number of investigations that have been closed. The Division will modify the investigation closure process to require that all the findings of allegations of abuse or neglect be entered into the automated system before the supervisor can approve the closure of the investigation.

Target Completion Date: March 31, 2006

Recommendation 2a:

To ensure the Division can effectively monitor investigation timeliness, it needs to add edits to the case management system to prevent invalid dates being input.

DES Response 2a:

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

The Division will modify the automated system to ensure the following:

- 1) The response date cannot precede the communication received date.
- 2) The investigation cannot be closed unless a response date has been entered.

Target Completion Date: June 30, 2006

In addition, the Division will research what potential modifications can be made to the automated case management system to allow an "unknown" report to be assigned within the automated system and then later merged with a prior case when the names of family members become known. Currently, "unknown" CPS reports are assigned to the CPS worker who initiates the investigation but the CPS report is not assigned in the case management information system until the surname of the family becomes known. This prevents the creation of additional cases on the same family in the case management information system that are not linked to one another. However, this results in invalid dates in the case management information system.

Target Completion Date for Research: February 28, 2006

Recommendation 2b:

To ensure the Division can effectively monitor investigation timeliness, it needs to clarify policy to clearly indicate that it is the CPS investigator's response time that must be recorded in the automated case management system, even if emergency personnel are also involved.

DES Response 2b:

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

DES agrees that it is the CPS investigator's response time that must be recorded in the automated case management system. In addition, DES believes that it is also important to document when emergency personnel have provided first response and have ensured child safety.

The Division will clarify with CPS staff the policy when they can indicate someone other than CPS conducted the initial response and the subsequent time frame for CPS to initiate their investigation

Target Completion Date: December 31, 2005

In addition, the Division will modify the automated case management information system to allow entry of both the initial CPS response time and the initial response time of emergency personnel, when emergency personnel response has ensured child safety.

Target Completion Date: June 30, 2006

Recommendation 2c:

To ensure the Division can effectively monitor investigation timeliness, it needs to modify the automated case management system to allow the recording of the assignment of a report with an unknown family surname and then later merge it with any prior cases once the family surname becomes known.

DES Response 2c:

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

The Division will research what potential modifications can be made to the automated case management system to allow an “unknown” report to be assigned within the automated system and then later merged with a prior case when the names of family members become known. Currently, “unknown” CPS reports are assigned to the CPS worker who initiates the investigation but the CPS report is not assigned in the case management information system until the surname of the family becomes known. This prevents the creation of additional cases on the same family in the case management information system that are not linked to one another. However, this results in invalid dates in the case management information system.

Target Completion Date for Research: February 28, 2006

Recommendation 3:

To better ensure the safety and well being of child victims of abuse and neglect, the Division should investigate 100 percent of reports requiring investigation.

DES Response 3:

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

Recommendation 4:

To improve the usefulness of the investigation closing summary documentation, the Division should ensure investigators document consistent and comprehensive information.

DES Response 4:

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

The Division will incorporate the CPS supervisor's review of this requirement through the development and implementation of an “investigation case closure” template. This template will contain all the necessary elements the CPS supervisor needs to review prior to investigation case closure, including documentation of consistent and comprehensive information.

Target Completion Date for Template Implementation: January 31, 2006

Recommendation 5a:

To better ensure investigative performance is timely and thorough, the Division should establish three to five priorities that are most important to the investigative function and would demonstrate that the Division is performing efficiently and focus on these areas.

DES Response 5a:

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

Based up the Auditor General's recommendation, the Division established and set the following priorities: Response Timeliness, Investigation Completion, and Documentation.

The first two priorities are key performance indicators that are in the Business Intelligence Dashboard. The Business Intelligence Dashboard will record an investigation as completed when all the allegation findings are entered. The third priority, documentation, is addressed within the Division's response to the Auditor General's number 4 recommendation.

Target Completion Date: January 31, 2006

The Division will continue to look for opportunities to better ensure timely and thorough investigations.

Recommendation 5b:

To better ensure investigative performance is timely and thorough, the Division should develop and use additional management reports or other mechanisms to keep Division administration apprised of investigative performance in the established priority areas so that timely corrective action can be taken if needed.

DES Response 5b:

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

The Division has taken the following steps to improve the development and use of management tools to monitor performance:

- The Division is implementing a user-friendly on-line reporting tool (Business Intelligence Dashboard) which will allow management, supervisors and CPS staff to view collected data, analyze trends, and most importantly, monitor performance. The Division has prioritized the following for the initial data components for this new automated tool: response time for CPS investigations, timeliness of CPS investigations, and timeliness for case manager visitation with children and families. This new tool will be available in January 2006, and will portray data on a statewide, district, unit, and individual worker basis.
- In October 2005, the Division initiated monthly learning sessions with the Practice Improvement Specialists (including Central Office and District staff), District Automation Liaisons (DALs), Division Reports & Statistics staff, the Program Administrator for Finance and Business Operations, and the District Program Managers to train staff on the use of data. The initial training was provided by the National Resource Center for Child Welfare Data and Technology and the National Resource Center for Organization Improvement on October 6th & 7th. The focus of the first learning session was to develop a baseline of knowledge and understanding around child welfare data. The second session occurred on November 16, 2005 and focused on some of the current reports which are

distributed to the Districts, including exception reports. One of the goals of these sessions is to develop the knowledge and expertise of the staff whose responsibility it is to use data and management reports to inform and monitor practice.

- Case Reviews are completed on a random sample of cases in each district to monitor performance based upon the federal Child and Family Service Review. This review includes timeliness of investigations and other critical functions. After each district review, the findings are reviewed with Division and District staff. The Case Review mirrors the federal Child and Family Service Performance measures and identifies the percentage of investigations initiated within state policy timeframes. These reviews have not identified any uninvestigated reports.

The Division will continue to implement the above strategies and look for other opportunities to monitor CPS performance.

Recommendation 5c:

To better ensure investigative performance is timely and thorough, the Division should hold staff accountable for achieving the Division's priorities and expectation by requiring the Division's personnel unit to implement a centralized tracking system to record when staff evaluations are due and conducted and each person's overall performance rating so that management can readily identify those workers in need of corrective action.

DES Response 5c:

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

DES concurs that the timely completion of performance evaluations (ESTEEM) for staff is a critical component of management. Unfortunately, there is no automated system that can generate reports to identify which staff have past due ESTEEMs or which staff have upcoming ESTEEMs. DES is working with the Department of Administration (ADOA) to determine if it is possible to establish an interface between the ADOA Human Resource Information System (HRIS) and the DES Financial Management Control System (FMCS) Data Warehouse to generate these reports. DES understands that ADOA is also exploring an automated tracking system for PASE which is the staff evaluation format being used by ADOA and most other state agencies. If that evaluation process can be automated more easily and quickly than developing an interface for HRIS and FMCS, DES would prefer to change to the PASE evaluation process, rather than developing a duplicate staff evaluation tracking system.

Recommendation 6:

Because of the negative impact that untimely, inaccurate, and incomplete documentation can have on a child's continued safety and well-being, as well as an investigator's ability to investigate CPS reports and substantiate allegations of abuse and neglect where appropriate, Division management should communicate the importance of recording timely, accurate, and complete documentation in the automated case management system.

DES Response 6:

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

The Division will continue to communicate the importance of accurate and timely case documentation. During initial case manager core training, accurate and timely case documentation is trained and the importance emphasized.

The Division will send a reminder to CPS staff regarding the importance of recording timely, accurate, and complete documentation in the automated case management system.

Target Completion Date: December 16, 2005

The Division will develop and distribute documentation guides for CPS supervisors and workers.

Target Completion Date: February 15, 2006

The Division will develop and implement an advanced training class on documentation. All CPS supervisors and workers will be required to attend this training.

Target Completion Date Curriculum Development: February 28, 2006
