

Special Audit

Arizona Department of Child Safety

Investigations of Noncriminal Child Abuse and Neglect Reports

Department did not always inform individuals under noncriminal investigation of their rights and/or specific allegations against them in writing or timely complete and/or properly document some key investigative activities, which could negatively impact children and families



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Audit staff

Jeff Gove, Director Christina Gallo

Jessika Hallquist, Manager Logan Johnson

Katie Peairs, Visual Communications Specialist Chloe Ralle

Contact information

(602) 553-0333

contact@azauditor.gov

www.azauditor.gov Phoenix, AZ 85018-7271

2910 N. 44th St., Ste. 410



Lindsey A. Perry, Auditor General

Melanie M. Chesney, Deputy Auditor General

September 23, 2025

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

Director Ptak Arizona Department of Child Safety

Transmitted herewith is a report of the Auditor General, A Special Audit of Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports. This report is in response to a September 18, 2024, resolution of the Joint Legislative Audit Committee. I am also transmitting within this report a copy of the Report Highlights to provide a quick summary for your convenience.

As outlined in its response, the Department agrees with all the findings and plans to implement or implement in a different manner all the recommendations. My Office will follow up with the Department in 6 months to assess its progress in implementing the recommendations. I express my appreciation to Director Ptak and Department staff for their cooperation and assistance throughout the audit.

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

Sincerely,

Lindsey A. Perry, CPA, CFE

Lindsey A. Perry

Auditor General



Arizona Department of Child Safety

Special Audit—Investigations of Noncriminal Child Abuse and Neglect Reports

Department did not always inform individuals under noncriminal investigation of their rights and/ or specific allegations against them in writing or timely complete and/or properly document some key investigative activities, which could negatively impact children and families

Audit purpose

To determine whether the Department investigated noncriminal child abuse and neglect reports it received in fiscal year 2024 as required by statute and Department policy.¹

Key findings

- Independent child welfare expert's review found Department policies and procedures for conducting investigations of allegations of child abuse and neglect include practices that support accountability, child safety, and transparent decision-making.
- Department made/attempted initial contact with alleged child victims within time frames required by its policies for 97% of all fiscal year 2024 noncriminal reports.
- Department did not always inform individuals under noncriminal investigation of their rights and/or the specific allegations against them in writing as required by statute and its policy, risking it being unable to demonstrate it did not violate individuals' rights and potentially hindering individuals' understanding of their rights and specific allegations against them.
- Department did not always complete, timely complete, and/or properly document some key activities required by statute and/or its policies in noncriminal child abuse and neglect investigations, including interviewing alleged child victims, developing plans to ensure substance-exposed newborns' health and well-being, and entering investigation findings into its case management system.
- Failure to complete/document investigative activities could impact children's welfare and impede subsequent investigations and prolonged noncriminal investigations may negatively impact the long-term welfare of families and trust in the Department.

Key recommendations to the Department

- Inform all individuals under investigation of their statutory rights and specific allegations against them in writing, as required by statute.
- Timely complete and document key noncriminal report investigation activities.

The Arizona Auditor General conducted this special audit of the Department pursuant to a September 18, 2024, resolution of the Joint Legislative Audit Committee and will conduct another special audit of the Department's processes, including for initiating and conducting investigations of criminal reports of child abuse and neglect, due September 30, 2026.

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- ▶ JLAC resolution directed us to assess Department's processes for investigating reports of child abuse and neglect and consider various potential audit questions related to these processes

FINDING 1

Department did not always inform individuals under noncriminal investigation of their rights and/or specific allegations against them in writing as required, putting the Department at risk of being unable to demonstrate it did not violate individuals' statutory rights and potentially hindering individuals' understanding of their rights and specific allegations against them

- Department did not inform individuals under noncriminal investigation of the specific allegations against them in writing in 78 of 125 sampled reports, and of their rights in writing in 6 of those 78 sampled reports, or properly document those notifications for 63 of 125 sampled reports we reviewed, as required by statute and/or Department policy
- Lack of documented notices and/or insufficiently documented allegations in notices puts the Department at risk that it will be unable to demonstrate it did not violate individuals' statutory rights, and failure to notify individuals in writing of their rights and specific allegations against them may hinder their understanding of these rights and allegations
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INTRODUCTION

The Arizona Auditor General has released the first report in a series of 2 special audit reports on the Arizona Department of Child Safety's (Department) processes for initiating and conducting investigations of reports of child abuse and neglect, pursuant to a September 18, 2024, resolution of the Joint Legislative Audit Committee (JLAC). This special audit provides information on the different types of child abuse and neglect reports that the Department investigates, including criminal and noncriminal, and determined whether the Department investigated noncriminal child abuse and neglect reports it received in fiscal year 2024 as required by statute and Department policy. The second special audit will review the Department's processes for initiating and conducting investigations of child abuse and neglect reports involving allegations of criminal conduct and investigations involving out-of-home caregivers who work at licensed child welfare agencies/group homes.

Department is responsible for investigating allegations of child abuse and neglect

Arizona Revised Statutes (A.R.S.) §8-451 established the Department with the primary purpose to protect children in Arizona, and the Department is statutorily responsible for investigating reports of alleged child abuse and neglect (see textbox, page 2, for a description of the types of reports the Department is responsible for investigating, and Figure 1, page 3, for information about the number of reports of alleged child abuse and neglect the Department received in fiscal year 2024).^{2,3} The Department was also established, in part, as a result of thousands of reports of child abuse and neglect not investigated by its predecessor agency, Child Protective Services within the Department of Economic Security.⁴

Statute requires the Department to:

▶ Operate a centralized hotline for the public to report alleged child abuse and neglect.⁵

Pursuant to the September 18, 2024, JLAC resolution, we will conduct 2 special audits of the Department's processes for initiating and conducting investigations of reports of child abuse and neglect, with the second audit due September 30, 2026.

Pursuant to A.R.S. §8-201(2), abuse is the infliction or allowing of physical injury, impairment of bodily function or disfigurement, or the infliction of or allowing another person to cause serious emotional damage as evidenced by severe anxiety, depression, withdrawal, or untoward aggressive behavior and which is diagnosed by a medical doctor or psychologist and is caused by the acts or omissions of an individual who has the care, custody, and control of a child. Abuse includes inflicting or allowing sexual abuse, sexual assault, child sex trafficking, or other sexual exploitation of a child; physical injury resulting from allowing a child to enter or remain in a structure or vehicle with toxic chemicals or equipment for purpose of manufacturing dangerous drugs; and unreasonable confinement of a child.

Pursuant to A.R.S. §8-201(25), neglect is the inability or unwillingness of a parent, guardian, or custodian of a child to provide that child with supervision, food, clothing, shelter, or medical care if that inability or unwillingness causes substantial risk of harm to the child's health or welfare, except if the inability to provide services to meet the needs of a child with a disability or chronic illness is solely the result of the unavailability of reasonable services; allowing a child to enter or remain in a structure or vehicle with toxic chemicals or equipment for the purpose of manufacturing dangerous drugs; a determination by a health professional that a newborn was exposed prenatally to certain drugs or substances and the exposure was not the result of a medical treatment administered to the mother or newborn; a diagnosis by a health professional of an infant with fetal alcohol syndrome or fetal alcohol effects; deliberate exposure of a child to sexual conduct or explicit sexual materials; and the committing of sexual acts with reckless disregard as to whether the child is physically present.

Prior to the Department's establishment, the State's child welfare functions were conducted by Child Protective Services within the Department of Economic Security's Division of Children, Youth, and Families. According to Arizona Senate documentation, in November 2013, the Department of Economic Security identified thousands of allegations of child abuse and neglect that were classified by Child Protective Services as not investigated. The Department of Economic Security's Division of Children, Youth, and Families was terminated by a Governor executive order in January 2014. Laws 2014, 2nd S.S., Ch. 1, §20, established the Department, effective May 2014.

A.R.S. §8-455 requires the Department to operate a centralized hotline all hours every day to receive allegations of child abuse and neglect. Department hotline intake specialists are responsible for receiving the allegations and determining if the information in the allegation meets the statutory criteria for a report, the priority level of the report, and whether the report contains criminal or noncriminal allegations (see pages 4 through 5 for more information).

- Investigate reports of child abuse and neglect.
- Determine the nature, extent, and cause of any condition that supports or refutes an allegation that the child is a victim of abuse or neglect.

Alleged child abuse and neglect report types investigated by Department

According to Department policy and procedures and pursuant to A.R.S. §8-455(G), the Department classifies and investigates reports alleging a child was abused or neglected as either criminal or noncriminal.¹

Criminal²

Investigations of reports alleging criminal conduct can include allegations such as:3

- Domestic violence that involves a weapon occurring with a child present in the room.
- Threat to a child with a deadly weapon such as a bat, pipe, firearm, or knife.
- Sexual abuse and/or sexual exploitation of a child, including sex trafficking.
- Untimely death of a child, excluding car accidents and alleged suicides, unless the alleged suicide involved a firearm.
- Nonaccidental or unexplained serious injuries, such as burns and substantial bruising.

Noncriminal

Investigations of reports alleging noncriminal conduct can include allegations such as:

- Domestic violence that does not include a weapon occurring with a child present in the room.
- Not being willing or able to meet a child's needs.
- Living environment is a threat to a child's safety.
- Verbal threats to a child made without a weapon in hand.
- Newborn exposed to alcohol, or controlled legal or illegal substances in utero.
- Not protecting a child from child-on-child sexual contact.
- Untimely death of a child from a car accident or alleged suicide that did not involve a firearm.

Source: Auditor General staff review of Department policies and procedures for child abuse and neglect investigations and A.R.S. §§8-201 and 8-455.

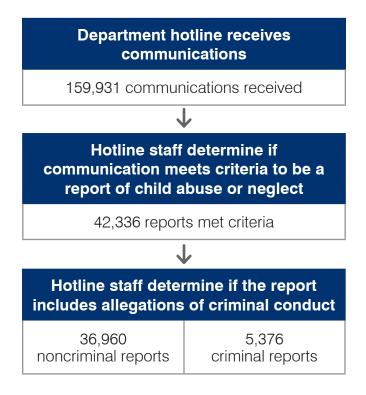
According to A.R.S. §8-455, the suspected child victim must be a resident of the State or present in the State.

As discussed on page 1, we will review the Department's practices for investigating criminal child abuse and neglect allegations in our second special audit report, due September 30, 2026.

A.R.S. §8-201(8) defines a criminal conduct allegation as an allegation of conduct by a parent, guardian, or custodian of a child or an adult member of the victim's household that, if true, would constitute a felony offense that constitutes domestic violence as defined in A.R.S. §13-3601; a violation of A.R.S. §13-3623 involving child abuse, A.R.S. §\$13-1404 or 13-1406 involving a minor, or A.R.S. §\$13-1405, 13-1410, or 13-1417; an offense that constitutes domestic violence as defined in A.R.S. §13-3601 and that involves a minor who is a victim of or was in imminent danger during the domestic violence; or any other act of abuse that is classified as a felony.

Figure 1

Department hotline staff determined that 36,960 communications the Department received in fiscal year 2024 met the criteria to be a noncriminal report of child abuse or neglect¹



See page 4 for more information about how the Department determines whether communications regarding suspected child abuse or neglect meet the criteria to be a report of child abuse or neglect.

Source: Auditor General staff review of Department policies, procedures, and written guidance for child abuse and neglect investigations, the Department's June 2025 Monthly Operational Outcomes Report, and Department-reported case-management system data as of December 2024.

Department policies outline requirements for Department staff to respond to and investigate noncriminal allegations of child abuse and neglect

The Department has developed policies and procedures to help its staff comply with federal and State laws that govern the Department.⁶ Department policies, procedures, and/or guidance for conducting investigations require investigators to (1) complete and document various steps intended to protect children during the noncriminal investigation process and (2) obtain sufficient evidence to determine whether to substantiate an allegation of noncriminal child abuse or neglect.^{7,8}

According to the Department, it updates its policies and procedures on an ongoing basis to respond to new or revised federal and State laws, changes in accepted standards of practice, and State initiatives.

Department policy requires investigators to document all communications, required documents, notes, and contacts for noncriminal child abuse and neglect investigations in the Department's case-management system within 10 days that the related activity occurred, and Department policies require all documentation to be complete, accurate, and current.

⁸ Department policy refers to its staff as specialists, and investigative specialists are one type of Department specialist. See Auditor General report 20-105 *Arizona Department of Child Safety—Caseworker Caseload Standards*, page 2, for more information.

Key requirements in the Department's noncriminal investigation process include:

Hotline staff required to determine if communications regarding suspected child abuse or neglect meet statutory definition of a report the Department must investigate

The Department's hotline staff are responsible for determining if communications regarding suspected child abuse or neglect meet the statutory criteria to be a report of alleged child abuse or neglect.^{9,10} If the communication meets the statutory criteria to be a report, A.R.S. §8-456 requires the Department to investigate it. The date and time that the determination is made is the report's receipt date/time, beginning the investigation.

Hotline staff required to assign priority levels to reports of alleged abuse or neglect

The Department's hotline staff are responsible for assigning priority levels to each report based on the type and severity of the child abuse or neglect allegation (see textbox, page 5, for descriptions of Department priority levels).¹¹ After prioritization, the hotline staff then assign noncriminal reports to 1 of the Department's local field offices for noncriminal investigation.^{12,13}

Field office investigators required to make reasonable efforts to contact the child victim in-person at their known or probable location within specific time frames

Department policy requires investigators to make efforts to contact the child victim in person within specified time frames established in Department policy (see textbox, page 5, for investigator response time frames by priority level). Department efforts to contact the child victim can include visits to the child's home or school. Investigators may also conduct public record reviews and Arizona Department of Public Safety background checks to identify a potential address to help locate the child victim.

Per A.R.S. §8-455(D), an allegation must meet the following criteria to become a report: the suspected victim is under 18 years old; the suspected conduct would constitute abuse or neglect by the victim's parent, guardian, custodian, or an adult member of the victim's household; the suspected victim is a resident of or present in Arizona; and the identity or current location of the child victim, the child's family, or alleged perpetrator is known or can be reasonably ascertained. According to Department policy, if an allegation does not meet the criteria to become a report, the hotline staff should inform the reporting source that the information they provided did not meet the criteria to be a report and document the communication in the Department's case-management system. Additionally, according to Department policy, every 3 days, a hotline supervisor should review communications concerning child abuse or neglect that did not meet the criteria to be a report to verify that the communication was properly classified.

¹⁰ Statute does not include a definition for noncriminal report but includes definitions for abuse, neglect, and criminal conduct allegations.

Hotline staff will also determine whether the allegation(s) includes issues of criminal conduct, and if so, they mark the report as involving criminal conduct.

¹² Hotline staff generally assign criminal reports to the Department's Office of Child Welfare Investigations for a criminal conduct investigation.

The Department has established field offices in locations throughout Arizona to administer and coordinate the Department's child welfare services and casework. See Auditor General report 23-115 Arizona Department of Child Safety—Sunset Review, pages 38 through 39, for more information.

Child abuse and neglect report priority levels and required response time frames

The Department is statutorily required to identify the priority level of reported allegations.¹ Department policy establishes priority levels for reported allegations and requires investigators to respond with in-person contact/attempted contact with the child victim within specific time frames (see Other Pertinent Information 2, pages 41 through 43, for information on the Department's initial response time for noncriminal reports of abuse and neglect in fiscal year 2024).

Examples of allegations by priority and the required response time frames according to Department policies and procedures are as follows:²

Priority 1 (2-hour response time)

A criminal or noncriminal report alleging death, near fatality, or other serious injury to a child; that a child may be the victim of sexual abuse or is alone and unable to care for themself or others; or that a substance-exposed newborn is expected to be discharged from the hospital within 24 hours.

Priority 2 (48-hour response time)

Any criminal report not labeled as a priority 1, and any noncriminal report alleging abuse or neglect of a child under 3 years old or an allegation in which the alleged perpetrator or vulnerable child are the subject of a prior report.³

Priority 3 (72-hour response time)

A noncriminal report alleging abuse or neglect of a child within the 12 months preceding the report.

Priority 4 (7-day response time)

A noncriminal report alleging abuse or neglect of a child more than 12 months prior to the report.⁴

Source: Auditor General staff review of Department policies, procedures, and written guidance for child abuse and neglect investigations and A.R.S. §8-455.

A.R.S. §8-455(B)(4) requires the Department to determine the appropriate priority level based on the report-screening assessment. According to Department policies and procedures, hotline staff use the report-screening assessment to determine the appropriate priority level based on the allegation information.

² Department policy establishes initial response time frames.

According to Department guidance, a vulnerable child includes a child who is under 5 years old, has diminished mental or physical capacity, has medical or emotional needs, or lacks visibility in the community such as through school or daycare.

⁴ According to A.R.S. §8-455(F), the Department is not required to investigate a noncriminal report if all the following apply: (1) the suspected conduct occurred more than 3 years before the communication to the hotline and (2) there is no information or indication that a child is currently being abused or neglected.

Investigators must assess if the child is in present danger

Department policy requires investigators, upon contact with an alleged child victim and any other children residing in the home, to assess and determine if the child is in present danger (see textbox for more information about present danger). If a child is found to be

in present danger. Department policy further requires that the investigator develop and implement, with supervisor approval, a Present Danger Plan before the investigator leaves the child. A Present Danger Plan is intended to ensure the child's immediate safety while the investigator completes the investigation and their assessment of the child's longer-term safety and household stability, referred to as the Family Functioning Assessment (see pages 7 through 8 for more information about the Department's Family Functioning Assessment). According to Department policy, the Present Danger Plan must identify responsible adult(s) who will ensure the safety of the child, action items to manage the safety threats, level of contact between child and caregiver(s), and how the investigator will oversee the plan. 14

Key term

Present danger: Immediate, significant, and clearly observable conditions that obviously endanger the child in that moment or threaten to endanger the child at any moment, requiring immediate intervention. For example, present danger may exist when a caregiver is unable to perform essential responsibilities due to substance use; a child who is incapable of care for themself is alone and unsupervised; or physical conditions of the home are hazardous to the child's health and safety, such as a building that is at risk of collapse or drugs being manufactured in the home.

Source: Auditor General staff review of Department policies and procedures for child abuse and neglect investigations.

Investigators may take a child into temporary custody if probable cause exists to believe removal will protect the child from suffering abuse or neglect, and must comply with temporary custody statutory requirements when doing so

If the investigator and their supervisor determine that a child must be taken into Department custody to ensure their safety, statute and Department policy require that prior to taking the child into temporary custody, the investigator (1) gets parent or guardian consent to place the child in the Department's custody temporarily, (2) obtains a court order, or (3) serves a Temporary Custody Notice without court authorization if exigent circumstances exist. ^{15,16,17} According to A.R.S. §8-823 and Department policy, the child's

¹⁴ The Department has various options for how present danger can be managed depending on the child's and family's needs. For example, the Present Danger Plan can include requiring a threatening person to leave the home, requiring a responsible adult to move into the home, or placing the child in the Department's temporary custody.

According to Department policy, exigent circumstances exist when there is probable cause to believe that a child is likely to suffer serious harm in the time it would take to obtain a court order, and either there is no less-intrusive alternative to taking the child into temporary custody or the child is suspected to be the victim of a sexual offense or serious injury that can only be diagnosed by a medical professional with forensic training.

¹⁶ A.R.S. §§8-821 through 8-823.

According to statute, the Department can take a child into temporary custody pursuant to an order of the superior court.

parent or guardian must be notified immediately, or within 6 hours if the Department takes a child into temporary custody while the caregiver is not present.^{18,19} According to A.R.S. §8-821, a child cannot be held in the Department's temporary custody for more than 72 hours unless the Department files a dependency petition.²⁰

Investigators must interview family and others living in the child's home and inform individuals under investigation of their rights during the investigation

Department policy requires investigators to conduct in-person interviews of the alleged child victim(s), any other children residing in the home, the alleged perpetrator(s), and all adults living in the home where the alleged abuse or neglect occurred, including the child's parent(s)/guardian(s)/custodian(s) (caregiver). A.R.S. §8-809.01 and Department policy require the investigator to inform the individual(s) under investigation of their statutory rights during the investigation, and Department policy requires the investigator to provide them with a Notice of Duty to Inform, which is an acknowledgement of receipt of the notice of their rights (see Appendix C, pages c-2 through c-3, for an example of a Notice of Duty to Inform).²¹

Investigators must determine the safety of children and household stability using the Family Functioning Assessment and, if necessary, develop a safety plan for the child

According to Department policy, investigators must complete a Family Functioning Assessment to determine whether a child is safe or unsafe using 16 specific indicators of safety threats within 45 days of the report being assigned to a field office. For example, the Family Functioning Assessment is required to identify the extent and circumstances of the alleged abuse or neglect as well as the dynamics within the home, including child and adult functioning, parenting, behavior management, and discipline. If the investigator determines in the Family Functioning Assessment that a child is unsafe, Department policy requires the investigator to develop and implement a Safety Plan, which outlines the

According to A.R.S. §8-823, if the parent or guardian does not reside in Arizona, then the investigator must provide written notice within 24 hours, and if their residence is not ascertainable, then reasonable efforts must be made to locate and notify the parent/guardian as soon as possible.

¹⁹ If a child who is removed from their home is eligible for membership in or a member of a Native American tribe (tribal member), federal law requires the tribe to be notified. Specifically, the tribal member child's removal is subject to the Indian Child Welfare Act (ICWA), a federal law that outlines requirements for the removal and out-of-home placement of Native American children. Additionally, the Department has Memorandums of Agreement with 4 Native American tribes in Arizona—the Navajo Nation, the Pascua Yaqui Nation, White Mountain Apache Tribe, and Salt River Pima-Maricopa Indian Community—with additional requirements for notifying those Native American tribes of a child's removal, including time frames for that notification.

According to A.R.S. §8-823, if the child is in temporary custody due to exigent circumstances for the purposes of an examination, the child must be returned within 12 hours unless the medical professional diagnoses that abuse or neglect occurred.

A.R.S. §§8-803 and 8-809.01 require investigators to inform those who are under investigation of their statutory rights verbally and in writing, such as notification that they are under investigation and the specific complaint or allegation being investigated, as well as their rights to deny child safety workers entry into their home, to seek the advice of an attorney or have an attorney present when questioned, to appeal determinations made by the Department, and to refuse to consent to a drug or alcohol test, submit to a mental health evaluation, or sign a release of information document.

According to the Department, if a new noncriminal report regarding the family is received prior to the investigation being closed, the Department's general practice is to combine the open noncriminal reports for the family into 1 Family Functioning Assessment. The Department does not have guidance, such as time frames, for when a noncriminal report should or should not be combined into 1 Family Functioning Assessment, and a new noncriminal report can be combined with a previous noncriminal report even if the first noncriminal report received is already over the 45-day time frame for completing the Family Functioning Assessment (see Finding 3, page 37, for more information about the Department's practice of combining noncriminal reports).

actions to be taken to ensure the child's basic needs and safety are met.^{23,24} Department policy requires supervisors to be involved in the development and approval of the Safety Plan.²⁵

Investigators must determine investigation findings within 45 days of abuse or neglect report receipt, as required by statute

Investigators must submit their written investigation findings into the Department's case-management system within 45 days of receipt of the report, as required by A.R.S. §8-456. The investigator must either propose to substantiate the allegations, unsubstantiate the allegations, or determine that the family is unable to be located by the Department (see key investigative finding terms textbox).²⁶

Investigators must make efforts to close the investigation within 60 days of the Department's receipt of the abuse or neglect reports and must notify the alleged perpetrator of the investigation finding once the investigation is closed

Key investigative finding terms

Proposed to substantiate: Used when the evidence gathered throughout the investigation supports an incident of abuse or neglect occurred.

Unsubstantiate: Used when the evidence gathered throughout the investigation does not support an incident of abuse or neglect occurred.

Unable to locate: Used if the child victim cannot be located despite reasonable efforts and there is insufficient evidence to conclude abuse or neglect occurred without interviewing or observing the child.

Source: Auditor General staff review of Department policies and procedures for child abuse and neglect investigations.

Investigators must make efforts to close the investigation within 60 days of receipt of the report, as required by Department policy.^{27,28} The investigator must also notify the alleged perpetrator of the investigation finding determination once the investigation is closed by providing them with an official notice of proposed substantiation or unsubstantiated,

According to Department policy, the Department may arrange, provide, and coordinate programs and services for the family without removing a child from their home if the investigator determined in the Family Functioning Assessment that the child is safe and is not in present or impending danger in the home, but is at risk of abuse or neglect. The Department has various services and supports that it can provide to families, such as making referrals for parenting classes, domestic violence education, nutrition and home-management services, and community resources to help address the family's specific needs.

According to Department policy, the Department must file a petition for an out-of-home dependency with the juvenile court when the child is assessed as unsafe; the safety plan includes out-of-home care or separation of the child from 1 or both parents; and there are legal grounds for a dependency. The juvenile court may adjudicate a child dependent and place them under the legal custody of the Department. See Auditor General report 23-115 *Arizona Department of Child Safety—Sunset Review*, for more information about the dependency process and out-of-home care.

According to Department policy, supervisors are required to confirm that the actions in the Safety Plan are the least intrusive actions that are sufficient to control the danger to the child.

According to Department policy, for reports where the investigator has proposed to substantiate the allegations, supervisors have 5 days to approve or modify the investigator's submitted investigation findings.

The Department's policy does not define "make efforts."

Pursuant to A.R.S. §8-456(F), after the investigation, the investigator must determine whether any child is in need of child safety services based on the investigation's findings and, if appropriate, offer the child's family those services to correct unresolved problems that could indicate a reason to adjudicate the child as a dependent of the Department.

according to Department policy (see Appendix C, pages c-4 through c-5, for examples of the Department's notices informing the alleged perpetrator of the investigation finding determination).²⁹

According to the Child Welfare League of America (CWLA), the Department's investigative process sets clear standards for timeliness and risk management and places a strong emphasis on legal and procedural safeguards (see Other Pertinent Information 1, pages 39 through 40, for CWLA's review of the Department's policies and procedures and recommended practices).³⁰

Department had 8,198 open reports as of March 2025

As of March 2025, the Department had 8,198 open reports, with the oldest report, a criminal report, open for almost 2 years (see key term textbox for the definition of open report and Table 1 for more information about these open

Copen report: Report that is open for investigation. Source: Auditor General staff review of Department data.

reports). Of the 8,198 open reports, 1,144 had allegations of criminal conduct, and the remaining 7,054 were noncriminal. Additionally, as shown in Table 1, 5,725 of the 8,198 (70%) open reports were priority 2 and 3 reports the Department received between January and March 2025.

Table 1

Majority of Department's 8,198 open reports were received in calendar year 2025 and were priority 2 and 3 reports¹

As of March 2025

	Priority level				
Year	1	2	3	4	Total
2023 open repor	ts				12
Noncriminal	0	0	0	0	_
Criminal	3	9	0	0	_
2024 open repor	ts				1,808
Noncriminal	102	408	879	23	_
Criminal	74	319	3 ²	0	
2025 open repor	ts				6,378
Noncriminal	432	1,509	3,637	64	_
Criminal	156	574	5 ²	12	_
Total	767	2,819	4,524	88	8,198

Although the Department has an additional investigation finding determination of unable to locate, Department policy only requires investigators to notify the alleged perpetrator of the investigation finding determination for proposed substantiation or unsubstantiated. As of September 2024, the Department changed this notification requirement to only apply if the investigation finding does not include a proposed dependency petition.

CWLA is a coalition of public and private agencies whose mission is to advance equity through policies and practices that ensure the well-being of children, youth, families, and communities.

Table 1 continued

Source: Auditor General staff review of Department provided report data as of March 2025.

Department's 12% investigator vacancy rate at end of fiscal year 2024 increased to 16% at end of fiscal year 2025

The Department reported it had 448 investigators and 82 investigative supervisors as of the end of fiscal year 2024, with more than half of those located in Maricopa County (see Table 2). Additionally, the Department reported it had 61 vacant investigator positions (12% vacancy rate) and no vacant investigative supervisor positions at the end of fiscal year 2024.

Table 2
Department had 61 vacant investigator positions at the end of fiscal year 2024, but all investigation supervisor positions were filled

	Investigator positions		Supervisor positions	
County	Filled	Vacant	Filled	Vacant
Cochise	7	4	1	0
Coconino	6	5	2	0
Gila	3	1	2	0
Graham/Greenlee	2	1	1	0
Maricopa	270	32	45	0
Mohave/LaPaz	17	0	3	0
Navajo/Apache	8	0	1	0
Pima	92	10	17	0
Pinal	13	6	4	0
Santa Cruz	2	0	1	0
Yavapai	16	1	3	0
Yuma	12	1	2	0
Total	448	61	82	0

Source: Auditor General staff review of Department-provided staffing information as of June 28, 2024.

Department's 8,198 open reports as of March 2025 include both noncriminal and criminal reports.

As discussed on page 5, criminal reports should be prioritized as a priority 1 or 2. According to the Department, the 9 criminal reports that were prioritized as priority 3 and/or 4 were prioritization mistakes. As discussed on page 1, our second special audit will review the Department's processes for initiating and conducting investigations of child abuse and neglect reports involving allegations of criminal conduct.

The Department reported that its investigator position vacancy rate increased to 16% at the end of fiscal year 2025. The Department also reported it increased the number of investigative supervisor positions as of the end of fiscal year 2025 (see Table 3).

Table 3
Department vacant investigator positions increased from 12% to 16% from fiscal year 2024 to 2025, but all investigation supervisor positions were filled

Position type	FY 2024	FY 2025	1-year change
Investigator positions			
Filled	448	439	- 9
Vacant	61	83	+ 22
Vacancy rate	12%	16%	
Supervisor positions			
Filled	82	88	+6
Vacant	0	0	No change
Vacancy rate	0%	0%	

Source: Auditor General staff review of Department-provided staffing information as of June 2024 and June 2025.

JLAC resolution directed us to assess Department's processes for investigating reports of child abuse and neglect and consider various potential audit questions related to these processes

The September 18, 2024, JLAC resolution directed us to assess the Department's processes for initiating and conducting investigations of reports of child abuse and neglect to be completed as 2 audit reports and indicated we could consider various potential audit questions related to these processes.

Pursuant to this resolution, this first audit report answered the following questions:

What are the different types of child abuse and neglect investigations that the Department conducts?

According to Department policy and procedures and pursuant to A.R.S. §8-455(G), the Department classifies and investigates reports alleging a child was abused or neglected as either criminal or noncriminal (see page 2 for more information on criminal and noncriminal reports). During this first audit, we reviewed the Department's investigations of noncriminal reports of child abuse and neglect.

What are the applicable requirements related to initiating, conducting, and completing child abuse or neglect investigations?

The Department has developed policies and procedures to help its staff comply with federal and State laws that govern the Department, and its policies, procedures, and/or guidance for conducting investigations require investigators to (1) complete and document various steps intended to protect children during the noncriminal investigation process and (2) obtain sufficient evidence to determine whether to substantiate an allegation of noncriminal child abuse or neglect (see pages 4 through 9 for more information on key requirements in the Department's noncriminal investigation process).

What are the applicable time frames for initiating, conducting, and completing child abuse or neglect investigations?

Department policy establishes priority levels for reported allegations and requires investigators to respond with in-person contact/attempted contact with the alleged child victim within specific time frames (see textbox on page 5 for more information on these time frame requirements). In addition, pursuant to A.R.S. §8-456, Department investigators must submit their written investigation findings into the Department's case-management system within 45 days of report receipt, and Department policy requires investigators to make efforts to close the investigation within 60 days of report receipt.

How do the Department's processes for investigating noncriminal reports compare to recommended practices?

CWLA's independent review of the Department's process for conducting investigations of noncriminal allegations of child abuse and neglect relied on various recommended practices and found the Department's investigative policies and procedures include practices that support accountability, child safety, and transparent decision-making, and 2 time frames are consistent with practices in other states (see Other Pertinent Information 1, pages 39 through 40).

Has the Department initiated, conducted, completed, and documented noncriminal child abuse and neglect investigations in accordance with its policy requirements and associated time frames?

Our review of Department investigations data and/or case files found the Department's 8,198 open reports as of March 2025 was a 75% decrease from the Department's 33,245 open reports as of April 2015, and the Department largely complied with time frames for initial contact with child victims for noncriminal reports it received in fiscal year 2024. Specifically, our review of Department data for all 36,960 noncriminal reports it investigated in fiscal year 2024 found that the Department made or attempted to make initial contact with the alleged child victims within the Department's required time frames in approximately 97% of all noncriminal reports the Department received in fiscal year 2024 (see Other Pertinent Information 2, pages 41 through 43). However, we identified multiple issues related to its compliance with other investigation policy requirements and time frames. Specifically, our review of a stratified random sample of 125 of 36,960 reports of noncriminal child abuse or neglect the Department received in fiscal year 2024 identified at least 1 instance of Department policy noncompliance in 123 of 125 noncriminal reports we

reviewed, or approximately 98% (see textbox for information on the number of noncriminal reports we selected from each Arizona county).

These instances of noncompliance included:

- Discrepancies with documenting that the individuals involved in the noncriminal report investigations were informed of their statutory rights and the specific allegations made against them (see Finding 1, pages 14 through 19).
- Discrepancies with documenting key investigatory steps as required by Department policy (see Finding 2, pages 20 through 27).
- Failures to complete key investigatory steps within statutory and/or Department policy time frames (see Finding 3, pages 28 through 38).

Appendix A, pages a-1 through a-13, provides detailed information about the issues we found for each of the 125 noncriminal reports we reviewed.

Noncriminal child abuse and neglect reports sampled by county

To obtain geographic coverage, our sample of 125 noncriminal reports consisted of between 5 and 49 randomly sampled reports from each of the State's 15 counties based on the population distribution of each county relative to the entire State population, as follows:

► Apache County: 5 of 154 ► Mohave County: 5 of 1,233

Cochise County: 5 of 680 Navajo County: 5 of 555

► Coconino County: 5 of 586 ► Pima County: 11 of 6,047

▶ Gila County: 5 of 276 **▶ Pinal County:** 5 of 2,464

▶ Graham County: 5 of 164 ▶ Santa Cruz County: 5 of 143

► Greenlee County: 5 of 63 ► Yavapai County: 5 of 1,020

La Paz County: 5 of 86 Yuma County: 5 of 947

Maricopa County: 49 of 22,542

Source: Auditor General staff review of Department fiscal year 2024 noncriminal child abuse and neglect-investigation data.

Department did not always inform individuals under noncriminal investigation of their rights and/or specific allegations against them in writing as required, putting the Department at risk of being unable to demonstrate it did not violate individuals' statutory rights and potentially hindering individuals' understanding of their rights and specific allegations against them

Department did not inform individuals under noncriminal investigation of the specific allegations against them in writing in 78 of 125 sampled reports, and of their rights in writing in 6 of those 78 sampled reports, or properly document those notifications for 63 of 125 sampled reports we reviewed, as required by statute and/or Department policy

Our review of a stratified random sample of 125 of 36,960 noncriminal child abuse and neglect reports the Department received in fiscal year 2024 found Department investigators did not inform some alleged perpetrators under investigation of their rights and/or specific allegations against them in writing and/or document those actions in the Department's case-management system, as required by statute and/or Department policy.¹ Consistent with statute, Department policy requires investigators to inform individuals who are under investigation of their statutory rights and the specific allegations made against them (rights and specific allegations) verbally and in writing, make efforts to obtain their signatures on a Notice of Duty to Inform, and document the signed Notice of Duty to Inform in the Department's case-management system as evidence the Department informed the individual(s) of their rights and specific allegations (see Appendix C, pages c-2 through c-3, for the Department's Notice of Duty to Inform).²

To assess the Department's compliance with statute and policy, we reviewed a stratified random sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024. Specifically, we randomly sampled 49 noncriminal reports from Maricopa County, 11 noncriminal reports from Pima County, and 5 noncriminal reports each from Arizona's remaining 13 counties to obtain geographic coverage of the State based on the population distribution of each county relative to the entire State's population. See Introduction, pages 12 through 13, for more information about our sample.

A.R.S. §§8-803 and 8-809.01 require investigators to inform those who are under investigation of their statutory rights verbally and in writing, such as notification that they are under investigation and the specific complaint or allegation being investigated, as well as their rights to deny child safety workers entry into their home, to seek the advice of an attorney or have an attorney present when questioned, to appeal determinations made by the Department, and to refuse to consent to a drug or alcohol test, submit to a mental health evaluation, or sign a release of information document.

However, Department investigators did not inform individuals of their statutory rights and/or specific allegations made against them in writing consistent with statute and/or Department policy for 78 of 115 noncriminal reports we reviewed that should have included a Notice of Duty to Inform as follows:³

- ▶ 6 of 115 noncriminal reports lacked any evidence either in the Department's case-management system or its hard copy files that individuals under investigation were informed of their rights and specific allegations in writing, as required by Department policy (see Appendix A, pages a-2 through a-13, for more information about which noncriminal reports lacked evidence of a Notice of Duty to Inform or had a Notice of Duty to inform that was not compliant with Department policy). These 6 noncriminal reports included allegations such as a caregiver being physically or verbally imposing or threatening, a caregiver being unable to perform parental responsibilities, and a caregiver being unwilling or unable to meet a child's medical healthcare needs.
- ▶ 72 of 115 noncriminal reports did not provide the individual(s) under investigation with the specific allegation(s) made against them in writing, inconsistent with A.R.S. §8-803 and Department policy. Specifically, in these 72 noncriminal reports, investigators provided a Notice of Duty to Inform to the individual(s) that did not include all allegations under investigation, or included only a Department case-management system number associated with the noncriminal report or vague allegation information, such as neglect or physical abuse. As such, individuals were not informed in writing that they were under investigation for specific allegations such as allowing a known sexual predator access to a child, being absent, being unwilling or unable to meet a child's needs, exposing a child to domestic violence, and being unable to perform parental responsibilities.

Additionally, Department investigators did not properly document it made these notifications consistent with policy for 63 of 115 noncriminal reports we reviewed that should have included a Notice of Duty to Inform, as follows:

- ▶ 13 of 115 noncriminal reports lacked a Notice of Duty to Inform, as required by Department policy, despite information in the Department's case-management system indicating the investigator provided and/or read the individual the Notice of Duty to Inform. These 13 noncriminal reports included allegations such as a child being injured due to a caregiver failing to supervise, caregiver failing to protect a child or placing a child in a dangerous situation, a child being exposed to domestic violence, and a caregiver being unwilling or unable to meet a child's needs.
- ▶ 50 of 115 noncriminal reports had the Notice of Duty to Inform stored in hard copy files rather than in the Department's case-management system, as required by Department policy.^{4,5} These 50 noncriminal reports included allegations such as a child's living

In 10 of 125 noncriminal reports we reviewed, the Department was unable to locate or contact the alleged perpetrators despite multiple attempts to do so consistent with Department policy, or the alleged perpetrators refused engagement with the Department, and therefore, it was unable provide a Notice of Duty to Inform to the individuals under investigations.

In these 50 noncriminal reports, the Notice of Duty to Inform was provided to individuals involved in investigations and stored in the Department's hard copy files after the Department's policy requiring the document to be stored in the Department's case-management system went into effect on October 30, 2023.

⁵ Of these 50 noncriminal reports with a Notice of Duty to Inform that was not stored in the Department's case-management system, 32 noncriminal reports also lacked the specific allegations made against the individual under investigation.

environment being a threat to their safety, a caregiver being unwilling or unable to meet a child's medical healthcare needs, and a caregiver allowing a known sexual predator access to a child.

Lack of documented notices and/or insufficiently documented allegations in notices puts the Department at risk that it will be unable to demonstrate it did not violate individuals' statutory rights, and failure to notify individuals in writing of their rights and specific allegations against them may hinder their understanding of these rights and allegations

Absent documentation of the specific allegations in the notices and/or the required notices in the Department's case-management system, as required by its policy, the Department is at risk of being unable to demonstrate it informed individuals of their rights and specific allegations and thus did not violate individuals' rights, such as if the hard copy document cannot be located or was damaged in storage. Specifically, individuals under investigation have the right to know the specific allegation(s) made against them; have an attorney present during questioning; refuse Department investigators entry to their home; make complaints against the Department without fear of reprisal from the Department; refuse to consent to a drug or alcohol test; and appeal determinations made by the Department.

Additionally, providing individuals with their rights and the specific allegations against them in writing can help the individuals better understand the investigation against them and not rely on their memories of verbal conversations with the Department investigator. For example, research indicates that stressful events could negatively impact memory formation, retention, and recall, such as impacting an individual's ability to learn or process new information. As a result, having their rights and specific allegations in writing could help allow the individuals to review and better consider their rights and the specific allegations against them after the potential emotions and shock from the Department's initial contact has passed.

Further, the Arizona Ombudsman Citizen's Aide (State Ombudsman) conducts investigations into complaints it receives from citizens regarding administrative actions taken by the Department, such as whether the Department informed individuals under investigation of their rights and specific allegations in writing, as required by statute.⁷ According to the State Ombudsman's fiscal year 2024 annual report, it investigated a citizen's complaint that the Department provided them a blank Notice of Duty to Inform and did not provide them with information about the specific allegations made against them. According to the State Ombudsman's report, the citizen initially refused to cooperate with the Department. The State Ombudsman

Quaedflieg, C., & Schwabe, L. (2018). Memory dynamics under stress. Memory, 26(3), 364-376. Retrieved 8/25/2025 from https://doi.org/10.1 080/09658211.2017.1338299; Guenzel, F. M., Wolf, O. T., & Schwabe, L. (2013). Stress disrupts response memory retrieval. Psychoneuroendocrinology, 38(8), 1460-1465. Retrieved 8/25/2025 from http://dx.doi.org/10.1016/j.psyneuen.2012.12.010; and Shields, G. S., et al. (2017). The effects of acute stress on episodic memory: A meta-analysis and integrative review. Psychological Bulletin, 143(6), 636–675. Retrieved 8/25/2025 from https://doi.org/10.1037/bul0000100

In accordance with A.R.S. §§41-1376.01(C)(4) and 41-1378(D)(4), the Department must provide the State Ombudsman with access to Department records, including confidential records, with some exceptions, such as sealed court records without a subpoena, active criminal investigation records, records that could lead to the identity of confidential police informants, and attorney work product and communications that are protected under attorney-client privilege. Further, according to A.R.S. §41-1376(A)(7), the State Ombudsman has direct remote access to any automated case-management system used by the Department and access to Department records except as outlined in A.R.S. §41-1378.

could not identify any documentation or correspondence in the Department's records that the Department had informed the individual under investigation of their specific allegations, both verbally and in writing. The State Ombudsman requested the Department inform the individual both orally and in writing of the specific allegations against them, and the State Ombudsman followed up with the Department until the Department investigator informed the individual of the specific allegations, which the State Ombudsman confirmed approximately 1 month after the Department's investigation was opened. According to the Department, the State Ombudsman and the Department communicated about issues regarding the content of allegations included in the Notice of Duty to Inform, and as a result of that collaboration, the Department implemented Notice of Duty to Inform policy changes in October 2023, which included the requirement to upload the Notice of Duty to Inform into the Department's case-management system.

Department's communications concerning documentation and policy changes, and a lack of written guidance outlining its expectations likely contributed to noncompliance with required notifications to individuals under investigation

Various factors likely contributed to investigators not complying with statute and/or Department policies for informing individuals under investigation of their rights and specific allegations.

Specifically:

Department may have inadvertently led investigators to believe they must choose between taking action and documenting that actions have occurred

Although the Department reported that documentation is important and Department policy includes documentation requirements, the Department's prioritization of first completing actions and then documenting those actions may have inadvertently led investigators to believe that they have to and/or can make a choice between taking action or documenting.8 For example, Department policies require that investigators document all communications, required documents, notes, and contacts for noncriminal child abuse and neglect investigations in the Department's case-management system, but this documentation is not required to be completed until 10 days after the related activity occurred. Additionally, the Department reported during this audit and a previous audit that documentation is secondary to action.9 By conveying that action is primary and documentation is secondary, the Department could have inadvertently led investigators to misunderstand the importance the Department places on documentation, which may have led to the documentation issues we identified.

As discussed in Other Pertinent Information 2, pages 41 through 43, the Department's prioritization of actions, specifically actions related to determining the child's immediate safety, is evidenced by the Department meeting time frames for initial contact or attempted contact with alleged child victims for 97% of all 36,960 noncriminal reports the Department received in fiscal year 2024.

For example, in response to our September 2021 special audit report related to missing and runaway children, the Department stated in its response that documentation is secondary to action. Our September 2021 special audit report compared the Department's practices for classifying and locating runaway or missing children with best practices and found that the Department did not always comply with Department documentation requirements in cases we reviewed involving children missing from care in calendar year 2020. Our recommendations included that the Department expand its case review process to include determining whether cases have been timely documented in case notes. For more information on our report, see Arizona Auditor General report 21-113 Arizona Department of Child Safety—Comparing Department practices for classifying and locating children missing from care to best practices.

Documenting that all required steps of an investigation have been completed helps the Department ensure that investigators are complying with its policies, which are in place to ensure not only immediate child safety and child welfare but also that the Department is not violating the statutory rights of individuals under investigation and to defend itself against any claims to the contrary. When actions are not documented, it is not clear that the required investigatory steps were performed or the required notifications, including notifying individuals under investigation of the specific allegations made against them, have been made, and thus the Department risks not being able to demonstrate that it did not violate individuals' rights because the evidence will not exist for it to demonstrate that it has done so. For example, the Department reported that investigators would have verbally informed individuals under investigation of the specific allegations made against them during the course of an investigation; however, as discussed on page 16, providing the individual with their rights and specific allegations in writing can help the individual better understand and process this information.

Department policy does not provide guidance to investigators on the Department's expectation that a new Notice of Duty to Inform is provided when a new noncriminal report is received

The Department's policy does not specify Department expectations that a Notice of Duty to Inform should be provided for new allegations. Of the 6 noncriminal reports we reviewed that lacked any evidence that individuals under investigation were informed of their rights and specific allegations in writing (see page 15), 4 were noncriminal reports received involving families that already had a pending open noncriminal report (see Finding 3, page 37, for more information about the Department's process to combine multiple noncriminal reports into 1 investigation).¹⁰ In 3 of those 4 noncriminal reports, the Department provided a Notice of Duty to Inform for a noncriminal report that was combined with our sampled noncriminal report.¹¹ According to the Department, a new Notice of Duty to Inform containing the new allegation(s) would need to be provided to ensure the Department is meeting its obligation to inform those individuals about the new allegation(s).¹²

Department did not clearly communicate documentation policy changes to its staff In October 2023, the Department modified its policy for storing the Notice of Duty to Inform to require them to be stored in the Department's case-management system; however, the Department email notification to staff related to this change did not communicate the details of the policy modification and instead requested that staff read the modified policy. Additionally, staff may not have been trained on this change, as March 2024 staff training

¹⁰ The other 2 noncriminal reports we reviewed that lacked any evidence of a Notice of Duty to Inform involved families without pending open noncriminal reports.

The Department provided a Notice of Duty to Inform for a noncriminal report received prior to our sampled noncriminal report for 2 of these 4 combined noncriminal reports. For 1 combined noncriminal report, the Department provided a Notice of Duty to Inform for a noncriminal report that was received after our sampled noncriminal report. For the 1 remaining noncriminal report, the Department did not provide a Notice of Duty to Inform for any of the noncriminal reports combined with our sampled noncriminal report. Instead, the Department provided a Notice of Duty to Inform for a report involving the same alleged perpetrator that was received approximately 2 months after our sampled noncriminal report was closed.

According to the Department, investigators may provide only 1 Notice of Duty to Inform that includes the allegations from multiple combined noncriminal reports if an investigator had not yet made initial contact with the alleged perpetrator when a new noncriminal report is combined with a previously opened noncriminal report.

documentation regarding policy changes for notifying individuals of their rights did not reference the documentation storage requirement.

Recommendations to the Department

- 1. Inform all individuals under investigation of their statutory rights and specific allegations against them verbally and in writing and upload all Notices of Duty to Inform as evidence of these notifications to the Department's case-management system, as required by statute and/or Department policy.
- 2. Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of informing individuals under investigation of their statutory rights and specific allegations made against them verbally and in writing and properly documenting that notification in the Department's case-management system, as required by Department policy.
- **3.** Update Department policies and procedures to specify when a Notice of Duty to Inform is required.

Department response: As outlined in its **response**, the Department agrees with the finding and will implement the recommendations.

Department did not always complete and/or properly document some key investigative activities in noncriminal child abuse and neglect reports, which could impact children's welfare and impede subsequent investigations

Department did not always complete and/or properly document key investigative steps intended to protect children and obtain sufficient evidence to determine whether or not to substantiate an allegation as required by its policy for noncriminal child abuse and neglect investigations we reviewed

Our review of a stratified random sample of 125 of 36,960 reports of noncriminal child abuse or neglect (noncriminal reports) the Department received in fiscal year 2024 found that Department investigators did not always complete and document various assessments, plans, or steps intended to protect children during the investigation process and to obtain sufficient evidence to determine whether to substantiate an allegation of noncriminal child abuse or neglect (see Introduction, pages 3 through 8, for more information about Department policy requirements).¹

Specifically:

Investigators did not always complete and/or partially completed and/or supervisors did not always review key assessments or plans that help ensure child welfare, contrary to Department policy for noncriminal reports we reviewed

Department investigators did not always complete or included incomplete information in some Family Functioning Assessments, Present Danger Plans, and Infant Care Plans for substance-exposed newborns, and included incorrect information in 2 Family Functioning Assessments, contrary to Department policy (see Introduction, pages 7 through 8, for more information about Family Functioning Assessments and Present Danger Plans).² Each of these key assessments and plans require specific information that the Department is to use to help ensure the welfare of children who may be in danger or at risk.

To assess the Department's compliance with statute and policy, we reviewed a stratified random sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024. Specifically, we randomly sampled 49 noncriminal reports from Maricopa County, 11 noncriminal reports from Pima County, and 5 noncriminal reports each from Arizona's remaining 13 counties to obtain geographic coverage of the State based on the population distribution of each county relative to the entire State's population. See Introduction, pages 12 through 13, for more information about our sample.

⁴² U.S. Code (USC) 5106a(b)(2)(B) requires that the governor of each state provide an assurance that the state has policies and procedures to address the needs of substance-exposed newborns, including a requirement to develop a plan of safe care for the affected infants as part of receiving federal grants for child abuse or neglect prevention and treatment programs.

However, our review found that Department investigators:

 Omitted key information or included incorrect key information required by Department policy for 14 of 123 noncriminal reports we reviewed that required a Family Functioning Assessment³

Specifically, for 12 noncriminal reports we reviewed, the Family Functioning Assessments were missing or contained incomplete information on key items required by Department policy, such as the extent of the alleged abuse or neglect, circumstances surrounding the alleged abuse or neglect, child functioning, adult functioning, and discipline and behavior management, including not documenting whether there was a safe sleeping environment for a child under the age of 1. Additionally, for 2 other noncriminal reports, the assessments included information that erroneously applied to a different family not involved in the investigation.

 Omitted key information and/or did not approve Present Danger Plans in accordance with Department policy for 3 of 10 noncriminal reports we reviewed that required a Present Danger Plan

Department policy requires investigators to include key information in Present Danger Plans to ensure a child's welfare during an investigation and supervisors to document approval of these plans in the Department's case-management system to demonstrate that the appropriate actions were taken to ensure the child would no longer be in present danger. However, for 2 noncriminal reports we reviewed that included allegations of a caregiver unable to perform their parental responsibilities and a child living in unsafe living conditions, the Present Danger Plans did not include key information, such as how the investigator would oversee the implementation of the plan, and 1 of these 2 was also not approved by a supervisor.⁴ Additionally, a Department supervisor did not document their approval of a Present Danger Plan for 1 additional noncriminal report we reviewed.

 Did not develop and implement Infant Care Plans to ensure the health and well-being of substance-exposed newborns for 4 of 11 noncriminal reports we reviewed involving substance-exposed newborns

Our review found the Department's case-management system lacked an Infant Care Plan for 4 of 11 reports that involved allegations of newborns prenatally exposed to controlled legal or illegal substances, including heroin, fentanyl, methamphetamines, and marijuana, and required Department investigators to develop them. When asked to provide evidence that these plans were developed, the Department could not explain why these plans were not documented in the Department's case-management system and could not locate physical copies of these plans in its hard copy files.

For 2 of 125 noncriminal reports we reviewed, a foster parent was the alleged perpetrator of abuse or neglect of a foster child. Department policy states that a Family Functioning Assessment does not need to be completed for a noncriminal report involving a foster parent unless the alleged child victim is the foster parent's biological or adopted child.

⁴ Specifically, in 1 noncriminal report, a Present Danger Plan for a child living in unsafe conditions was missing information on how the investigator would oversee its implementation. In the second noncriminal report, the Present Danger Plan for children whose caregiver was unable to perform parental responsibilities was missing information on action items to keep children safe, level of contact with the children and caregiver, and how the investigator would oversee the implementation of the plan.

 Did not approve Safety Plans in accordance with Department policy for 3 of 13 noncriminal reports we reviewed that required a Safety Plan

Department policy requires supervisors to document approval of Safety Plans, which outlines the actions to be taken to ensure the child's basic needs and safety are met for children determined in the Family Functioning Assessment to be unsafe, and to document the supervisor's confirmation that the actions in the Safety Plan are the least intrusive actions that are sufficient to control the danger to the child. However, Department supervisors did not document their approval of Safety Plans for 3 of 13 noncriminal reports we reviewed that required a Safety Plan, including for a noncriminal report that involved allegations that a child suffered injuries due to their caregiver's neglect and/or failure to supervise after the child's adult sibling kicked and hit the child.

Investigators did not always complete and/or properly document some key investigatory steps as required by Department policy for noncriminal reports we reviewed

Despite Department policy requiring investigators to complete and then document key investigatory steps in the Department's case-management system, our review found that Department investigators did not do 1 or the other or both for some noncriminal reports we reviewed (see textbox for more information on the specific policy requirements). For example, in addition to not conducting some of the key investigatory steps, the case-management system did not include case notes or scanned documents.

Department documentation requirements

Department policy requires the following key investigatory steps to be documented in the Department's case-management system:

- Attempts to make initial contact with alleged child victims.
- Assessments of the alleged child victims' safety.
- Interviews conducted with children, caregivers, and or alleged perpetrators involved in the investigation about the specific allegations.
- Notifications made to individuals under investigation of the investigation outcomes, including a copy of the Notice of Proposed Substantiation of Child Safety Report/Notice of Unsubstantiated Child Safety Report (finding notice).
- Completed Infant Care Plans.

Source: Auditor General staff review of Department policies and procedures for investigations.

Specifically:

- 2 of 125 noncriminal reports we reviewed lacked descriptive information in the Department's case-management system regarding the investigator's attempts to make initial contact with the alleged child victim(s), including a child victim who was alleged to have been exposed to domestic violence. For example, there was no descriptive information of all reasonable efforts to locate and contact individuals, such as the date, time, and location of contact or attempted contact, as required by Department policy.
- 10 of 120 noncriminal reports we reviewed had concerns related to the interviews with children, caregiver(s), and/or alleged perpetrator(s) involved in investigations for which these interviews should have occurred. For 5 of these 10 noncriminal reports, the Department's case-management system had no indication that interviews occurred, and these 5 noncriminal reports alleged various concerns such as a child being exposed to domestic violence, a caregiver recklessly or deliberately exposing a child to sexually explicit material or acts, and that a caregiver was unwilling or unable to meet the child's medical healthcare needs. For 1 noncriminal report, the investigator did not document the interviews in narrative form with the date, type, time, location, who was present, and information collected as required by Department policy, despite the Family Functioning Assessment indicating that interviews had occurred. Additionally, in 4 noncriminal reports, the interviews were conducted by phone, inconsistent with Department policy, and did not include any documentation regarding why the interviews were not conducted in person.
- 28 of 120 noncriminal reports we reviewed where notifications informing individuals under investigation of investigation outcomes should have been made lacked such notices. Of these 28 noncriminal reports, investigators unsubstantiated the allegations in 14, including allegations that a caregiver allowed a known sexual predator access to the child, a child's living environment was a danger to their safety, and a caregiver was unwilling or unable to meet the child's medical healthcare needs. In response to our special audit, the Department sent a notice to alleged perpetrators for 9 of the 28 noncriminal reports for which it lacked a documented notice.^{6,7}
- 1 of 7 noncriminal reports we reviewed where an Infant Care Plan was completed for a newborn who was alleged to have been exposed to marijuana lacked a documented plan in the Department's case-management system. However, during the audit, the Department identified this document in its hard copy files.

For 5 of 125 noncriminal reports we reviewed, the Department was unable to conduct interviews with the noncriminal report's alleged child victim(s) and alleged perpetrator(s) because it was unable to make contact with the family despite multiple efforts or the alleged child victim and/or alleged perpetrator(s) refused to be interviewed.

⁶ In 5 of 125 noncriminal reports we reviewed, the Department was unable to locate individuals under investigation or could not identify a valid address and therefore was unable to send a notice of investigation outcomes to these individuals.

For the remaining 19 noncriminal reports where there was no evidence of a notice sent to alleged perpetrators, the Department reported that it believed it provided notices for 6 noncriminal reports but did not document copies of the notices in the Department's case-management system and/or hard copy files, and it did not send a notice for 5 noncriminal reports because a dependency petition was filed. The Department did not provide additional information for the remaining 8 noncriminal reports we reviewed that lacked a documented notice.

Investigators did not document more than half of the notices informing individuals under investigation of investigation outcomes in its case-management system in accordance with Department policies for noncriminal reports we reviewed

Contrary to Department policies, for the 120 noncriminal reports we reviewed where notifications informing individuals under investigation of investigation outcomes should have been made, investigators stored notices informing individuals under investigation of the investigation outcomes for 63 noncriminal reports in hard copy files. Of these 63 noncriminal reports, 58 included notices informing the individuals that the investigation unsubstantiated allegations, such as a caregiver being absent, a child being exposed to domestic violence, and a child's living environment being a threat to their safety. Department policies require investigators to maintain required documents for child abuse or neglect investigations in its case-management system. However, during our audit, the Department identified these documents only in its hard copy files.

Department's failure to complete or document key assessments, plans, and investigatory steps could negatively impact its ability to ensure child welfare, impede subsequent investigations, and increase the risk that key investigatory information will be lost

Absent Department investigators completing and accurately documenting key assessments, plans, and investigatory steps in the Department's case-management system, including initial contact with the alleged child victim, key child safety assessments and plans, and interviews with individuals involved in the investigation, the Department risks the following:

Department may not have ensured children's health and well-being were protected

The Department may not have ensured children's welfare during investigations, as it was unable to provide complete and/or accurate investigation documentation indicating that it performed key assessments or investigatory steps meant to ensure child welfare. For example, the Department had no documentation indicating that required interviews with children, caregiver(s), and/or alleged perpetrator(s) occurred for 5 noncriminal reports we reviewed or that Infant Care Plans to ensure the health and well-being of substance-exposed newborns were developed for 4 noncriminal reports we reviewed. Without performing and documenting key assessments and investigatory steps related to ensuring child welfare, the Department lacks assurance that child welfare-related actions are occurring in the manner required by Department policies and procedures, potentially hindering the Department's ability to correct deficiencies and provide support to children in situations where their health and/or well-being are at risk.

Subsequent investigators and investigations may be impeded

Without accurate and complete documentation within the Department's case-management system, the Department is at risk of hindering in-process investigations that are reassigned

As discussed in footnote 6, in 5 of 125 noncriminal reports we reviewed, the Department was unable to locate individuals under investigation or could not identify a valid address and therefore was unable to send a notice of investigation outcomes to these individuals.

due to investigative staff turnover, especially if no hard copy investigative notes were taken. The Department is also at risk of impeding future investigators' ability to complete Department policy-required reviews of all prior reports before making initial contact with a child to identify patterns of abuse or neglect, previous investigation outcomes, patterns of escalation, and changes in familial composition, especially when responding to priority 1-level reports, which have a 2-hour response requirement that likely would not allow an investigator time to locate and obtain documentation from hard copy files. According to the Department's June 2025 *Monthly Operational and Outcome Report*, in fiscal year 2024, 23% of children who were the subject of a report were the subject of another report within 12 months, underscoring the importance of having this information documented for future investigators to review.⁹

Key investigatory information can be lost

Absent documentation in the Department's case-management system, key investigatory information can be lost when the investigator and/or investigative supervisor are no longer with the Department. For example, in 20 noncriminal reports we reviewed, the investigator and/or investigative supervisor were no longer with the Department, and the Department was unable to verify whether specific nondocumented investigatory steps occurred, such as interviews with children and individuals involved in the investigation. One of these 20 noncriminal reports alleged that a caregiver had unrealistic expectations and a distorted view of the child, and because the investigator was no longer with the Department, the Department was unable to verify whether interviews occurred and explain why the Family Functioning Assessment was missing information in 5 areas.

Arizona Ombudsman Citizen's Aide's investigation resolutions for Arizona citizens may be negatively impacted

The Arizona Ombudsman Citizen's Aide (State Ombudsman) has statutorily established direct access to the Department's case-management system to conduct investigations into complaints it receives from citizens regarding administrative actions taken by the Department. Missing documentation in the Department's case-management system may impact the State Ombudsman's investigations, such as how long those investigations take if the State Ombudsman has to reach out to the Department for information or obtain documentation from Department hard copy files after the State Ombudsman's review of the Department's case-management system does not identify relevant documentation. For example, according to the State Ombudsman's fiscal year 2024 annual report, it reviewed the Department's case-management system for a complaint from a school counselor

The Department's *Monthly Operational and Outcome Report* data includes children who were the subject of both criminal and noncriminal reports.

In accordance with A.R.S. §§41-1376.01(C)(4) and 41-1378(D)(4), the Department must provide the State Ombudsman with access to Department records, including confidential records, with some exceptions, such as sealed court records without a subpoena, active criminal investigation records, records that could lead to the identity of confidential police informants, and attorney work product and communications that are protected under attorney-client privilege. Further, according to A.R.S. §41-1376(A)(7), the State Ombudsman has direct remote access to any automated case-management system used by the Department and access to Department records except as outlined in A.R.S. §41-1378.

A.R.S. §41-1376. A.R.S. §41-1371 defines an administrative act as an agency's action, decision, omission, recommendation, practice, policy, or procedure but does not include the preparation or presentation of legislation or the substantive content of a judicial order, decision, or opinion.

alleging that the Department was not investigating concerns the counselor reported and that the Department failed to see the child related to these reports, even though the school counselor had made 3 reports to the Department. However, the Department's casemanagement system had no notes or documentation associated with the reports for this alleged child victim. According to the State Ombudsman, it had to contact the Department to obtain documentation confirming that the Department had seen the child and that the school counselor's allegations had been investigated.

Department communications concerning documentation may have contributed to Department policy noncompliance, and turnover impacts ability to know why key investigative steps were not performed or documented

Our review identified 1 primary reason, Department communication regarding documentation, for investigators and supervisors not documenting required investigative steps or plans/ assessments. Further, due to investigator turnover, the Department was unable to explain why investigators had not performed required investigative steps or completed assessments/plans to help ensure child welfare for several noncriminal reports we reviewed.

Specifically:

Department may have inadvertently led investigators to believe they must choose between taking action and documenting

As discussed in Finding 1 (see pages 17 through 18), the Department's prioritization of first completing actions and documenting those actions second, including referring to documentation as secondary to action, may have inadvertently led investigators to believe that they have to and/or can make a choice between taking action or documenting. This may have contributed to the issues we identified with investigator and supervisor noncompliance with Department policy documentation requirements in the 125 noncriminal reports we reviewed. However, when actions are not documented, it is not clear that the required investigatory steps were performed or the required assessments or plans were completed, and thus, the Department risks not being able to demonstrate that it ensured child welfare because the evidence will not exist for it to demonstrate that it has done so. For example, according to CWLA, adherence to documentation protocols is not merely procedural, it is a safeguard for children's lives and well-being, and without sufficient documentation, the rationale behind child safety determinations are obscured, supervisory oversight is hindered, and the legal defensibility of agency actions is weakened.

Investigator turnover impacted Department's ability to explain why investigators did not perform or document all investigative responsibilities in accordance with policies

When we requested information regarding why investigators did not perform or document their investigative responsibilities consistent with Department policies, the Department reported that due to investigative staff turnover, for 20 noncriminal reports, it could not provide the reason why investigators did not comply with Department policy requirements, including for:

- 1 of 2 noncriminal reports missing descriptive documentation of the investigator's initial attempted contact with the child. In this noncriminal report, the child was alleged to be the victim of unrealistic expectations, and the caregiver was allegedly supplying minors with alcohol.
- 3 of 4 noncriminal reports missing Infant Care Plans for newborns alleged to have been exposed to heroin, methamphetamines, and/or fentanyl.

These cases illustrate the importance of documentation for ensuring that investigative information is maintained, especially if the investigation needs to be reassigned to another investigator or the Department receives another report about the same family. Additionally, in these cases, the Department may be unable to ascertain whether the noncompliance was due to individual investigator error or a more systemic issue, such as lack of supervision, and then take appropriate corrective action.

Recommendations to the Department

- **4.** Conduct and document noncriminal report investigations as required by Department policy, including requirements for initial contact with alleged child victims, interviews, Present Danger Plans, Family Functioning Assessments, Infant Care Plans, and notices informing individuals of investigation outcomes.
- **5.** Emphasize to investigators and investigative supervisors through a multipronged approach, for example through Department communications, guidance, or training, the importance of completing and documenting the completion of key investigative steps in the Department's case-management system, as required by Department policy.
- **6.** Conduct a risk-based review or audit of noncriminal reports from fiscal year 2025 to determine if the missing documentation is a systemic issue within the units that involved investigative turnover for the noncriminal reports we reviewed and take action as necessary based on the findings.

Department response: As outlined in its **response**, the Department agrees with the finding and will implement or implement in a different manner the recommendations.

Department did not timely complete key investigative steps for many noncriminal reports we reviewed, and prolonged noncriminal investigations without active investigative efforts may negatively impact long-term welfare of families and trust in the Department

Department did not timely complete investigation findings and a key assessment, or close investigations within time frames required by statute and/or its policy for many noncriminal reports we reviewed

Although Department investigators mostly met the initial response time frame to make contact or attempt to make contact with alleged child victims, as required by Department policy, our review of Department data and/or a stratified random sample of noncriminal reports from fiscal year 2024 found that Department investigators did not comply with several other statutory and/or Department policy investigation time frames for many reports of noncriminal child abuse and neglect (noncriminal reports) we reviewed (see Other Pertinent Information 2, pages 41 through 43, for more information about the Department's initial response timeliness in fiscal year 2024).^{1,2}

Specifically, Department investigators:

Did not enter investigation findings in the Department's case-management system within 45 days, as required by statute, for 51% of noncriminal reports received in fiscal year 2024

A.R.S. §8-456 requires Department investigators to enter investigation findings into its case-management information system within 45 days after receiving a noncriminal report. However, our review of Department data for all 33,211 noncriminal reports the Department received in fiscal year 2024 for which we could review the date when the investigator entered investigation findings into the system found that Department investigators did not meet the investigation finding deadline for 16,924 noncriminal reports, or 51%.³

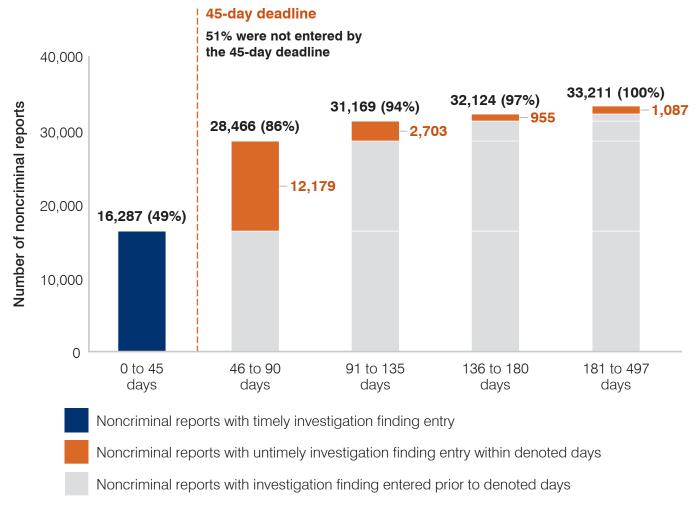
To assess the Department's compliance with statute and Department policy, we reviewed the Department's case-management system data for all 36,960 noncriminal reports the Department received in fiscal year 2024 and/or its case-management system and hard copy files for a stratified random sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024. Specifically, we randomly sampled 49 noncriminal reports from Maricopa County, 11 noncriminal reports from Pima County, and 5 noncriminal reports each from Arizona's remaining 13 counties to obtain geographic coverage of the State based on the population distribution of each county relative to the entire State's population. See Introduction, pages 12 through 13, for more information about our sample.

As discussed in Other Pertinent Information 2, pages 41 through 43, the Department met the initial response time frames in 97% of all 36,960 noncriminal reports it received in fiscal year 2024.

Although the Department received 36,960 noncriminal reports in fiscal year 2024, we were unable to assess investigation finding timeliness for 3,749 of these noncriminal reports because the Department's case-management system data did not include an investigation finding date or the original date the investigator entered their investigation finding into the case-management system, or included both timely and untimely investigation finding dates for allegations on the same noncriminal report. For example, for 2,511 of these noncriminal reports the Department's case-management system data included only the date the Department's Protective Services Review Team entered a final investigation finding of substantiated or unsubstantiated for each finding, instead of the original date the investigator entered their proposed substantiation finding. The Department identified that the investigator's original finding entry date still exists in the version history of the case-management system and, as of July 2025, had identified a solution to maintain the investigator's investigation finding entry date, which it intends to implement in the future.

Investigators took between 46 and 497 days, with an average of 88 days, after receiving these 16,924 noncriminal reports to enter investigation findings into the Department's case-management system (see Figure 2 for more information about investigator entry of investigation findings into the case-management system).⁴ This includes a noncriminal report we reviewed that had an investigation finding of unsubstantiated entered at 328 days that alleged that a child was a substance-exposed newborn.

Figure 2
Department took more than 45 days to enter investigation findings in its casemanagement system for more than half of the noncriminal reports we reviewed,
contrary to statute



Source: Auditor General staff review of Department policy and Department-provided data as of December 2024 for noncriminal reports received in fiscal year 2024.

Did not complete Family Functioning Assessments within 45 days of noncriminal report assignment, as required by Department policy, for nearly half of noncriminal reports we reviewed that required these assessments

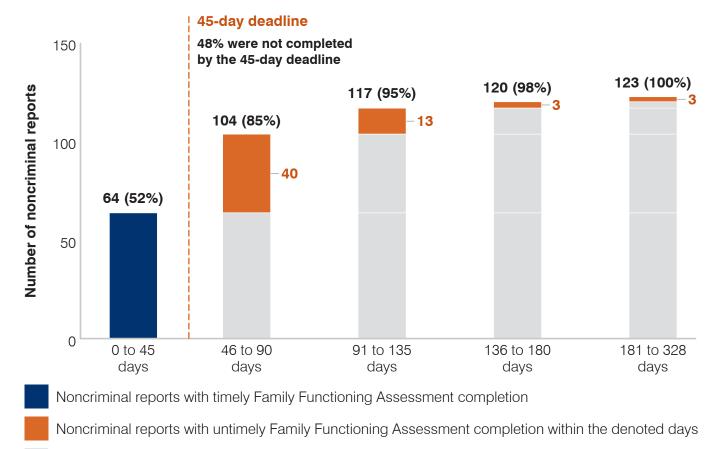
Our review found that Department investigators did not complete a Family Functioning Assessment within 45 days of noncriminal report assignment as required by Department

The median number of days the Department took to enter investigation findings into the Department's case-management system for these 16,924 noncriminal reports that did not meet the 45-day time frame was 68 days.

policy for 59 of 123 (48%) noncriminal reports we reviewed that required this assessment.^{5,6,7} As shown in Figure 3, the Department took between 46 and 328 days, with an average of 87 days, to complete Family Functioning Assessments for these 59 noncriminal reports.⁸ These 59 noncriminal reports included 1 noncriminal report with a Family Functioning Assessment completed after 284 days that found the children to be safe (see textbox, page 33, for more information about this noncriminal report). As discussed in the Introduction, pages 7 through 8, the Family Functioning Assessment is the Department's documented determination of the safety of children whose families are subject to investigation.

Figure 3

Department took more than 45 days to complete Family Functioning Assessments for nearly half of the noncriminal reports we reviewed, contrary to its policy requirement



Source: Auditor General staff review of Department policy and Department's case-management system and investigatory documents in the Department's hard copy files for a stratified random sample of 125 noncriminal reports of child abuse and neglect.

Noncriminal reports with Family Functioning Assessment completed prior to denoted days

⁵ A Family Functioning Assessment is completed in the Department's case-management system.

⁶ For 2 of 125 noncriminal reports we reviewed, a foster parent was the alleged perpetrator of abuse or neglect of a foster child. Department policy states that a Family Functioning Assessment does not need to be completed for a noncriminal report involving a foster parent unless the alleged child victim is the foster parent's biological or adopted child.

To assess the Department's compliance with its requirement that investigators complete a Family Functioning Assessment within 45 days of report assignment, we reviewed a stratified random sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024 because the Department's data for all noncriminal reports it received in fiscal year 2024 lacked the date of completion for Family Functioning Assessments

The median number of days the Department took to complete a Family Functioning Assessment for these 59 noncriminal reports that did not meet the 45-day time frame was 64 days.

Did not close investigations within 60 days for more than 13,000 noncriminal reports received in fiscal year 2024

Department policy requires investigators to "make efforts" to close noncriminal investigations within 60 days, and the Department reviews whether noncriminal investigations were or were not closed within 60 days to assess compliance with this policy requirement. However, our review of Department data for all 36,877 noncriminal reports the Department received in fiscal year 2024 that were closed as of April 10, 2025, found that Department investigators did not close noncriminal investigations within 60 days of receiving the noncriminal report for 13,310 noncriminal reports, or 36% (see textbox, page 33, for an example of a noncriminal report we reviewed that was not timely).⁹ As shown in Figure 4 (page 32), the Department took between 61 and 595 days, with an average of 103 days, to close those 13,310 noncriminal report investigations.¹⁰ These 13,310 noncriminal reports included 40 unsubstantiated noncriminal reports we reviewed that were closed between 61 and 331 days of report receipt with allegations such as a child being forcefully struck, a child being exposed to domestic violence, a child's living environment being a threat to their safety, and a caregiver allowing a known sexual predator access to a child.^{11,12}

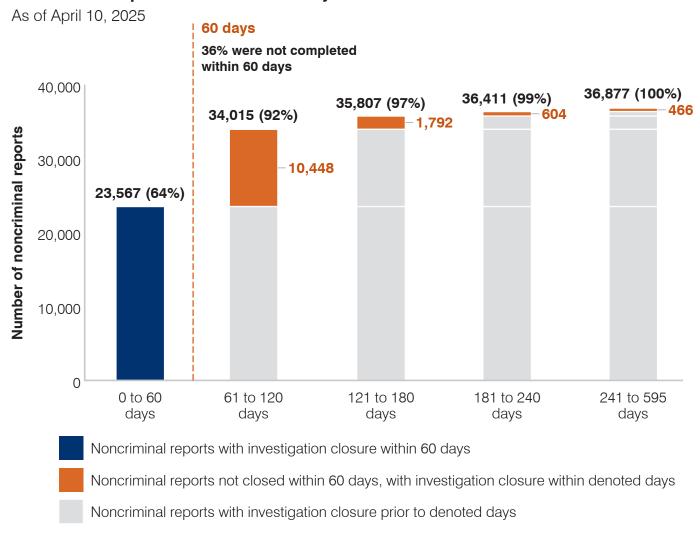
According to the Department's data, as of April 10, 2025, the Department had 82 noncriminal reports received in fiscal year 2024 that were still open. As of April 10, 2025, all 82 noncriminal reports had been open for at least 284 days.

The median number of days the Department took to close noncriminal investigations for these 13,310 noncriminal reports that did not meet the 60-day time frame was 83 days.

We reviewed these 40 noncriminal reports as part of our stratified random sample of 125 noncriminal reports the Department received in fiscal year 2024 (see Introduction, pages 12 through 13, for more information about the noncriminal reports we reviewed).

These 13,310 noncriminal reports also included 7 noncriminal reports we reviewed that included at least 1 allegation that investigators proposed substantiating and were closed between 81 and 151 days of report receipt. We reviewed those 7 noncriminal reports as part of our stratified random sample of 125 noncriminal reports the Department received in fiscal year 2024 (see Introduction, pages 12 through 13, for more information about the noncriminal reports we reviewed).

Figure 4
Department took more than 60 days to close more than a third of investigations of noncriminal reports received in fiscal year 2024¹



According to the Department-provided data, as of April 10, 2025, 82 noncriminal reports the Department received in fiscal year 2024 were still open.

Source: Auditor General staff review of Department policy and Department-provided data as of April 10, 2025, for noncriminal reports received in fiscal year 2024.

Although strict adherence to investigative time frames can negatively impact investigation quality, prolonged noncriminal investigations without active investigatory efforts could negatively impact the well-being of families under investigation and trust in the Department

Although the Child Welfare League of America (CWLA) indicated that imposing strict adherence to child abuse and neglect investigative time frames may inadvertently pressure investigators in complex investigations and risk compromising the thoroughness of investigations and safety assessments, CWLA reported that prolonged investigations and/or delays in investigating reports of alleged child abuse and neglect could negatively impact the well-being of families who are subjects of Department investigations and community trust in the Department (see textbox, page 33, for an example of a prolonged investigation of a noncriminal report we reviewed).¹³

¹³ Complex investigations can include investigation with multiple children, extensive contacts with law enforcement or health professions, and multijurisdictional concerns.

According to CWLA, research, recommended practices, and child welfare experts' practice wisdom indicate that workable time frames for conducting child abuse and neglect investigations, making and documenting decisions, and closing investigations are critical to ensure children are safe, families get the support they need to care for their children, trauma and stress resulting from being investigated are minimized, and the trust of the State's broader community in the agency's role in ensuring the protection of children is maintained. For example, CWLA reported that investigation findings that are completed promptly and documented clearly and precisely help ensure child safety, and CWLA found that a 45-day child welfare investigative time frame, such as the Department's 45-day time frames for completing Family Functioning Assessments and determining investigation findings, is intended to optimize the balance between quick child safety decisions and procedural fairness for families (see Other Pertinent Information 1, pages 39 through 40, for more information about CWLA's review of the Department's investigation process).

According to CWLA, outcomes of clear deadlines can include reducing the period of uncertainty for children and families awaiting investigation outcomes. Conversely, according to CWLA, allowing prolonged investigations and/or extended investigative time frames without conducting active investigative efforts combined with not following documentation standards can have profound consequences for children and families, including prolonged family stress and delays in services for children. Finally, CWLA reported that delayed decision-making and inconsistent documentation during investigations can compromise the integrity of the investigation, which can erode public trust in the child welfare system.

Example of a prolonged noncriminal investigation we reviewed

Upon our initial review of the noncriminal report on January 3, 2025, the Department's case-management system had no documentation of interviews, a present danger assessment, Family Functioning Assessment, or investigation findings for a noncriminal report it had received in June 2024, approximately 7 months prior to our review.¹ After we requested information about this noncriminal report from the Department, in March 2025, a Department investigator documented various investigative efforts that occurred in June 2024 into the Department's case-management system, including interviews with the alleged child victims and alleged perpetrators.² In addition to entering the interview documentation, the investigator also completed the Family Functioning Assessment in March 2025. The Department entered the investigation findings in April 2025, approximately 10 months after the noncriminal report was received. We did not identify any investigative efforts involving the family after the initial June 2024 interviews.

- According to the Department, at the time this noncriminal report was received, the field office assigned only had 1 investigator, and the field office experienced an increase in investigations that were open for more than 60 days.
- The Department investigator who completed the documentation and Family Functioning Assessment was not the same investigator who conducted the investigative efforts in June 2024.

Source: Auditor General staff review of Department's case-management system and Department-reported information.

A 2018 issue brief from Casey Family Programs found that the processes of investigation, removal, and placement, while necessary, are typically viewed or experienced by children and families as "adverse childhood experiences," which can lead to prolonged stress and long-term trauma for children and their families. Casey Family Programs (2018). Issue brief: Safe children—How does investigation, removal, and placement cause trauma for children. Retrieved 6/24/2025 from https://www.casey.org/media/SC_Investigation-removal-placement-causes-trauma.pdf

Multiple factors likely contributed to Department's investigation untimeliness, including its communications concerning nonimmediate child-safety related time frames and lack of data to identify systemic causes of untimely investigations

Our review identified various causes for untimeliness in Department investigations, including:

Department may have inadvertently led investigators to believe that complying with nonimmediate child-safety related time frames is not important

Although the Department reported that nonimmediate safety-related time frames in the investigative process are important and Department policy has requirements related to these time frames, the Department may have inadvertently led investigators to believe that complying with these time frames is not important. As discussed in Findings 1 and 2 (see Finding 1, pages 17 through 18, and Finding 2, page 26), the Department prioritizes Department staff taking actions, such as conducting in-person child safety contacts and assessments of immediate child safety. For example, the Department and its investigators prioritize meeting required time frames for making/attempting to make contact with alleged child victims, a key step in determining a child's immediate safety, as indicated by Department investigators meeting these times frames for 97% of all noncriminal reports it received in fiscal year 2024 (see Other Pertinent Information 2, pages 41 through 43, for more information about investigator initial contact/attempted contact with alleged child victims in fiscal year 2024 and pages 28 through 32 for more information on Department untimeliness). Conversely, the Department does not place a similar emphasis on meeting nonimmediate safety-related required time frames in the investigative process, which could have inadvertently led investigators to misunderstand the importance the Department places on complying with these time frames and the noncompliance we identified.

For example, the Department may have inadvertently led investigators to believe that complying with the nonimmediate safety-related time frames is not important by:

- Lacking written guidance on the efforts investigators should make to close investigations within 60 days. In response to our request during this audit for written guidance on the efforts investigators should make to close investigations within 60 days, the Department reported such written guidance would conflict with the Department's primary purpose to protect children because it would convey prioritization of time frames over child safety.
- Not monitoring the 45-day statutory requirement for entering investigation finding determinations into the Department's case-management system. For example, the investigation finding entry date timeliness is not a scorecard metric that Department leadership reviews at its monthly meetings, and it is not a standard metric on Department investigative supervisors' dashboards. According to the Department, it does not monitor the 45-day statutory requirement because it is not directly related to child safety, and rather, it is an indicator of timely assessment completion and closure. Instead, the Department reported it monitors indicators directly related to child safety, such as timely initial response and timely in-person contact with children.

 Reporting that it does not expect that all its investigations will be timely and does not have an expected target for how many will be timely.

This may have also resulted in the Department being more likely to close an investigation within 60 days when a child is found to be in present or imminent danger during the investigation, in contrast to those where the child is found not to be in present or imminent danger during an investigation (see Introduction, page 6, for more information about Department determinations of present or imminent danger). Specifically, of the 125 noncriminal reports we reviewed, investigators closed 9 of 10 (90%) noncriminal reports in which investigators determined the child was in present or imminent danger during the investigation within 60 days and only closed 68 of 115 (approximately 59%) noncriminal reports in which the investigation determined the child was not in present or imminent danger during the investigation within 60 days.

However, as previously discussed, timely completion and documentation of the completion of an investigation helps to ensure the child's safety and well-being, and minimize trauma.

Department does not systematically track causes of untimely investigations, including factors outside investigators' control, such as delays in receiving medical and police records, and their impact on Department investigations

Although the Department reviews how many investigations were completed within 60 days and some units manually track reasons for delays using a 45-day tracking sheet, it lacks a mechanism in its case-management system to systematically track and produce data on the specific causes of investigation untimeliness, such as the issues identified and logged by units in their 45-day tracking sheets. 15 Additionally, the Department reported it relies on Department leadership's knowledge of data trends to determine the causes of untimely investigations. 16,17 For example, the Department reported that extenuating circumstances that investigators have limited or no control over, such as delays in receiving medical or police records, can impact investigation timeliness. Department leadership reported that the Department discusses these delays with key outside professionals, such as law enforcement and hospitals. However, the Department does not have data on whether and how frequently delayed records from outside professionals is the main cause of untimely investigations, how many additional days on average delayed records may lengthen the Department's investigations, or if other causes within the Department's control exist which is data that could assist the Department in determining the most effective steps to take to improve investigation timeliness.18

¹⁵ As of July 2025, the 45-day tracking sheet was not a Department-wide requirement, and only some units used the tracking sheet.

The Department reported an example of a data trend for investigation closure is that the time to close an investigation increases at the beginning of the school year because the Department generally has an increase in the number of noncriminal reports that require an investigation, thus increasing untimeliness.

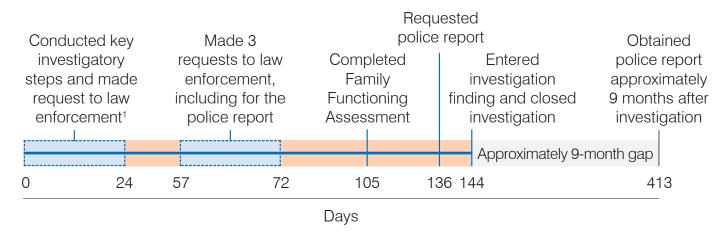
According to the Department, its leadership staff have worked in the child welfare system for more than 10 years, with some staff having more than 20 years of experience.

Our review of the 69 noncriminal reports that were untimely in at least 1 area—Family Functioning Assessment, finding determination, or investigation closure—identified 20 noncriminal reports that were likely untimely due to circumstances outside of the investigator's control, such as difficulty making contact with parents and delays coordinating with and/or receiving documentation from outside agencies, including law enforcement and medical professionals. For example, in 1 noncriminal report we reviewed, the investigator requested an emergency meeting with the family and the child's medical professional, and documented various efforts to try and obtain that meeting and information over a 49-day period. Specifically, the medical professional was unable to meet for 22 days, and the investigator waited an additional 27 days to obtain a document from the medical professional.

For example, 1 noncriminal report we reviewed took the Department 144 days to close. The Department reported the main reason this investigation took longer than 60 days was that the investigator was waiting for police records. However, we found that after multiple attempts to obtain the police report, the investigator was able to complete the Family Functioning Assessment, enter an investigation finding of proposed substantiation, and close the investigation without obtaining the police report (see Figure 5 for a timeline of the investigatory steps in this noncriminal report). Further, the police report for that noncriminal report was not provided to the Department until approximately 9 months after the investigation was closed.

Figure 5

Department made requests to law enforcement, including for the police report, 5 times over the span of 136 days in 1 noncriminal report we reviewed but ultimately proposed to substantiate the allegation and closed the investigation without the police report after 144 days



Our review of this noncriminal report involving a child who was an unrestrained passenger in a car accident resulting in the child's death found the investigator conducted key investigatory steps as required by Department policy, such as timely initial contact with the alleged child victim, observation and Present Danger Assessment of the alleged child victim, and initial interviews with the alleged perpetrator, caregiver, and law enforcement. See Introduction, pages 4 through 9, for more information on key requirements in the Department's investigation process.

Source: Auditor General staff review of Department's case-management system and Department-provided documents from its hard copy files for a stratified random sample of 125 noncriminal reports of child abuse and neglect.

CWLA recommends guidance for staff on factors outside of the Department's control, escalation pathways for complex cases, and time frame-extension protocols to help ensure that unpreventable delays are uniformly detected and that these types of exceptions do not mask systemic lags within the Department's control.

¹⁹ This investigation proposed substantiation of an allegation of "neglect: injuries due to neglect or failure to supervise" related to the child being an unrestrained passenger in a vehicle accident and sustaining injuries as a result. During the investigation, the child died from the injuries they sustained.

Department combines multiple noncriminal reports for the same family into 1 Family Functioning Assessment but lacks guidance for when and how this should occur, such as considering how long the first noncriminal report has been open, which can delay investigations

The Department reported that timeliness can be affected by the Department's practice of combining multiple noncriminal reports for a family into 1 Family Functioning Assessment (see Introduction, page 7, for more information about the Department's practice of combining multiple noncriminal reports). The Department reported that doing so allows investigators to assess the family comprehensively and the likelihood that the child will remain safe in the future. However, the Department lacks guidance for when and how investigators should combine noncriminal reports, such as considering how long the first noncriminal report has been open. Our review found that 8 of 59 noncriminal reports with untimely completion of the Family Functioning Assessment (see pages 29 through 30 for more information about these 59 noncriminal reports) were combined with another noncriminal report, and in 3 of these 8 noncriminal reports, the first noncriminal report to be received had already been open for more than 45 days when a new noncriminal report was received and combined with the previous noncriminal report, further delaying the investigation.²⁰ These 3 noncriminal reports included allegations that a caregiver allowed a known sexual predator access to a child, a caregiver had unrealistic expectations of a child, and a caregiver was unable to control a child's behaviors.

Department reported it experienced challenges in staffing, caseload, and report reassignment in some units but has taken efforts to begin addressing changing workload needs

Although the Department reported that it does not have caseload challenges Departmentwide, it reported that some counties have experienced low staffing, high caseloads for individual investigators and investigative units, and report reassignments between investigators, such as when an investigator resigns, which could have contributed to investigation untimeliness in those counties. Additionally, for 21 of 125 noncriminal reports we reviewed, Department staff cited these factors as barriers to timeliness, including for 8 of 10 noncriminal reports we reviewed for Gila and Yuma Counties. As of April 2025, the Department was in the process of conducting a staffing realignment to address changing workload needs, including realigning some noninvestigative positions to investigative positions (see Auditor General Report 20-105 Arizona Department of Child Safety—Caseworker Caseload Standards, pages 7 through 9, for more information on the Department's processes for realigning positions). The Department completed this process in June 2025 and reported it planned to assess the effectiveness of this realignment through Department management weekly meetings (see Auditor General Report 20-105) Arizona Department of Child Safety—Caseworker Caseload Standards, pages 9 through 10, for more information on the Department's processes for overseeing the effectiveness of its realignments).

For 7 of these 8 combined noncriminal reports, the Department also did not enter the investigation finding into its case-management system within 45 days after the Department receiving the noncriminal report, as required by statute, and took between 55 and 151 days to enter the investigation finding.

Recommendations to the Department

- **7.** Enter investigation findings into its case-management system within 45 days, as required by statute.
- **8.** Complete Family Functioning Assessments for investigations within 45 days, as required by Department policy.
- **9.** Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of entering investigation findings, completing Family Functioning Assessments, and closing investigations within statutory and/or Department policy time frames.

Establish and implement a process for Department leadership to:

- **10.** Track and monitor whether Department investigators are entering investigation findings into its case-management system within the 45-day statutory requirement.
- **11.** Track and monitor specific common causes of untimely investigations, including causes within and outside of the Department's control.
- **12.** Periodically assess the common causes of untimely investigations and take actions to address causes identified to ensure investigators improve timeliness, including in making efforts to close investigations within 60 days, as required by Department policy.

Develop and implement written policies, procedures, and/or guidance that outline requirements and processes for:

- **13.** Supervisors to meet with staff regarding barriers to completing an investigation within the time frames required by Department policy, and document those barriers and the supervisor's recommendation for how to proceed.
- **14.** Combining multiple noncriminal reports involving a family into 1 Family Functioning Assessment, including guidance for when a new noncriminal report should not be combined into a Family Functioning Assessment for a previous still open noncriminal report.
- **15.** As part of conducting ongoing monitoring of its staff realignment, ensure realignment addresses workload needs in the units where Department staff reported staffing, caseload, and/or report reassignment as barriers to timeliness and make additional changes to its investigations positions as needed.

Department response: As outlined in its **response**, the Department agrees with the finding and will implement or implement in a different manner the recommendations.

OTHER PERTINENT INFORMATION 1

Independent child welfare expert's review found Department policies and procedures for conducting investigations of allegations of child abuse and neglect include practices that support accountability, child safety, and transparent decision-making and 2 time frames are consistent with practices in other states

We contracted with the Child Welfare League of America (CWLA) to conduct an independent review of the Department's process for conducting investigations of noncriminal allegations of child abuse and neglect reports (noncriminal report).^{1,2} CWLA found the Department's investigative process, as outlined in the Department's policies and procedures, includes a structured risk assessment, legally grounded findings, and firm timelines that support accountability, child safety, and transparent decision-making.

For example, CWLA reported that the Department's investigation framework:

- Emphasizes documentation as a central tenant of the process.
- Establishes clear standards for timeliness and risk management.
- Emphasizes a tightly structured sequence of activities intended to ensure timely and evidence-based decisions about child safety.
- Emphasizes legal and procedural safeguards, offering robust due process and legal review mechanisms to protect parental rights and prevent wrongful substantiations.

Recommended practices CWLA relied on to make this assessment included practices for:

- Initiating timely and appropriate responses based on severity and urgency of the reported maltreatment.
- Establishing clear protocols for identifying and using observable criteria to identify threats to a child's safety that would require urgent protective action.
- Using validated structured decision-making tools to assess and guide decisions about safety and risk.
- Ensuring immediate safety planning and documenting safety plans with clear roles, timelines, and accountability.

¹ CWLA is a coalition of public and private agencies whose mission is to advance equity through policies and practices that ensure the well-being of children, youth, families, and communities.

See Introduction, pages 4 through 9, for information on key Department policy requirements for investigating noncriminal reports.

- Clearly documenting child safety decisions and how information gathered during investigations influenced decisions in case files and data systems.
- Engaging in multilevel decision-making to help ensure accuracy and accountability.
- Having clear criteria for substantiation that requires a preponderance of evidence that maltreatment occurred.
- Completing timely and thorough investigation closure documentation that reflects the investigation findings.

In addition, CWLA found that the Department's 45-day time frames for completing the Family Functioning Assessment and entering investigation findings into its case-management system are consistent with time frames in 30% of other U.S. states (see Introduction, pages 4 through 9, for more information about the Department's noncriminal report investigative time frames).³ Further, according to CWLA, 95% of other states have time frame requirements for similar investigation steps that range between 30 and 60 days, with 40% of those states maintaining a 30-day requirement, 30% maintaining a 45-day requirement, and 25% maintaining a 60-day requirement. CWLA further found that the 45-day investigative time frame in child welfare is designed to optimize the balance between rapid child safety decisions and adherence to procedural fairness for families, and the Department's policy appears to strike a balance between putting too much pressure on workers to move quickly and having too much time to let families linger without a decision.⁴

CWLA concluded that the research, recommended practices, and practice wisdom of child welfare experts all point to the need to have workable time frames for (1) initiating and conducting child abuse investigations, (2) making and documenting case decisions, and (3) closing investigations. CWLA stated that these time frames are critical to ensure children are safe, families get the support they need to safely care for their children, trauma and stress resulting from being investigated is minimized, and the broader community's trust that the State agency is fulfilling its federal and State-legislated role in ensuring the protection of children is maintained.

According to CWLA, federal law and policy specify that child welfare investigations should be prompt and timely but allow each state to determine specific time frame requirements for investigations.

According to CWLA, a 30-day requirement's emphasis on closing investigations quickly can sometimes lead to challenges with in-depth documentation and detailed child safety and risk evaluations.

OTHER PERTINENT INFORMATION 2

Department met its response time for initial contact or attempted contact with alleged child victims for 97% of all noncriminal child abuse and neglect reports in fiscal year 2024

As discussed in the Introduction, pages 4 through 5, Department policy requires Department staff to assign noncriminal reports of child abuse or neglect a priority level based on the severity of the noncriminal child abuse or neglect allegation. Further, the Department requires investigators to respond to the noncriminal report by making, or attempting to make, in-person contact with each alleged child victim within the required response time frame associated with each priority level (see Introduction, page 5, for more information on each priority level and its associated response time frames). As discussed in Finding 3, pages 34 through 35, the Department prioritizes Department staff taking actions related to determining the child's immediate safety, including initial contact or attempted contact with alleged child victims. According to the Child Welfare League of America, timely initiation of an investigation, particularly when face-to-face contact with the alleged child victim occurs, is critical for completing assessments to identify any present danger the alleged child victim might be in and take actions to minimize that danger.

The Department's prioritization of the child's immediate safety is evidenced by:

Department met initial contact or attempted contact time frame for approximately 97% of all 36,960 noncriminal reports received in fiscal year 2024

In fiscal year 2024, the Department received 36,960 noncriminal reports of child abuse and neglect. As shown in Table 4, page 42, our analysis of the Department's case-management system data found that Department investigators made or attempted to make initial contact with the alleged child victims within the Department's required time frames in 35,961 of 36,960, or approximately 97%, of all noncriminal reports the Department received in fiscal year 2024. For priority 1 noncriminal reports, which are the highest priority and require the Department to make initial contact within 2 hours, the Department met the time frame for 94% of noncriminal reports.

Table 4

Department attempted or made initial contact with the alleged child victim within the required response time for approximately 97% of noncriminal reports it received in fiscal year 2024

Department priority level	Department required initial response time frame ¹	Noncriminal reports received in fiscal year 2024	Number of timely initial noncriminal report responses	Percent of initial noncriminal report responses that were timely	
1	2 hours	4,152	3,908	94%	
2	48 hours	11,050	10,817	98%	
3	72 hours	21,192	20,696	98%	
4	7 days	566	540	95%	
Total		36,960	35,961	97%	

Department supervisory staff may extend a noncriminal report response time frame by no more than 24 consecutive hours when law enforcement, other emergency personnel, or a professional mandatory reporter, such as a doctor, made in-person contact with each alleged child victim and can confirm to the Department the children's location and safety, and whether the children are hospitalized, will remain under continuous supervision of a responsible adult, and/or the report is of a child's death and it is confirmed no other child is in danger. Additionally, Department policy requires the Department to make reasonable efforts to have in-person contact with each alleged child victim during the extended response time. According to Department policy, priority level 4 noncriminal reports may not be extended.

Source: Auditor General staff review of Department policy and Department noncriminal report data from fiscal year 2024.

Department met initial contact or attempted contact time frame for approximately 98% of 125 noncriminal reports we reviewed

Additionally, our in-depth review of a stratified random sample of 125 noncriminal reports the Department received in fiscal year 2024 found that Department investigators made or attempted to make initial contact with the alleged child victims within the Department's required time frames in 122 of 125, or approximately 98%, noncriminal reports we reviewed (see Table 5, page 43, for more information on initial response timeliness by priority level for our sample). For priority level 1 noncriminal reports in our sample, the Department met the 2-hour or less time frame to make initial contact for 13 of 14 noncriminal reports, or 93%, including for allegations that a caregiver allowed a known sexual predator access to the child, a child suffered injuries as a result of the caregiver's neglect or failure to supervise, and newborns were substance-exposed.

For these 3 noncriminal reports, the Department's initial contact with the alleged child victim was between 32 minutes to approximately 23 hours past the required initial response time frame.

Table 5

Department attempted or made initial contact with the alleged child victim within the required response time for approximately 98% of the 125 noncriminal reports we reviewed

Department priority level	Department required initial response time frame	Noncriminal reports we reviewed	Number of timely initial noncriminal report responses	Percent of initial noncriminal report responses that were timely
1	2 hours	14	13¹	93%
2	48 hours	34	33 ²	97%
3	72 hours	76	75³	99%
4	7 days	1	1	100%
Total		125	122	98%

For the 1 noncriminal report the Department responded to untimely at this priority level, the Department made initial contact with the alleged child victim approximately 2 hours past the Department's required initial response time frame.

Source: Auditor General staff review of Department policy and the Department's case-management system for a stratified random sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024. See Introduction, pages 12 through 13, for more information about our sample.

² For the 1 noncriminal report the Department responded to untimely at this priority level, the Department made initial contact with the alleged child victim approximately 23 hours past the Department's required initial response time frame.

³ For the 1 noncriminal report the Department responded to untimely at this priority level, the Department made initial contact with the alleged child victim 32 minutes past the Department's required initial response time frame.

SUMMARY OF RECOMMENDATIONS

The Arizona Auditor General makes 15 recommendations to the Department

Click on a finding, recommendation, or its page number to the right to go directly to that finding or recommendation in the report.

Recommendations to the Department

FII	NDING 1	14
1.	Inform all individuals under investigation of their statutory rights and specific allegations against them verbally and in writing and upload all Notices of Duty to Inform as evidence of these notifications to the Department's casemanagement system, as required by statute and/or Department policy.	19
2.	Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of informing individuals under investigation of their statutory rights and specific allegations made against them verbally and in writing and properly documenting that notification in the Department's casemanagement system, as required by Department policy.	19
3.	Update Department policies and procedures to specify when a Notice of Duty to Inform is required.	19
FII	NDING 2	20
4.	Conduct and document noncriminal report investigations as required by Department policy, including requirements for initial contact with alleged child victims, interviews, Present Danger Plans, Family Functioning Assessments, Infant Care Plans, and notices informing individuals of investigation outcomes.	27
5.	Emphasize to investigators and investigative supervisors through a multipronged approach, for example through Department communications, guidance, or training, the importance of completing and documenting the completion of key investigative steps in the Department's case-management system, as required by Department policy.	27
6.	Conduct a risk-based review or audit of noncriminal reports from fiscal year 2025 to determine if the missing documentation is a systemic issue within the units that involved investigative turnover for the noncriminal reports we reviewed and take action as necessary based on the findings.	27

FII	NDING 3	28
7.	Enter investigation findings into its case-management system within 45 days, as required by statute.	38
8.	Complete Family Functioning Assessments for investigations within 45 days, as required by Department policy.	38
9.	Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of entering investigation findings, completing Family Functioning Assessments, and closing investigations within statutory and/or Department policy time frames.	38
Est	ablish and implement a process for Department leadership to:	
	10. Track and monitor whether Department investigators are entering investigation findings into its case-management system within the 45- day statutory requirement.	38
	11. Track and monitor specific common causes of untimely investigations, including causes within and outside of the Department's control.	38
	12. Periodically assess the common causes of untimely investigations and take actions to address causes identified to ensure investigators improve timeliness, including in making efforts to close investigations within 60 days, as required by Department policy.	38
	velop and implement written policies, procedures, and/or guidance that outline uirements and processes for:	
	13. Supervisors to meet with staff regarding barriers to completing an investigation within the time frames required by Department policy, and document those barriers and the supervisor's recommendation for how to proceed.	38
	14. Combining multiple noncriminal reports involving a family into 1 Family Functioning Assessment, including guidance for when a new noncriminal report should or should not be combined into a Family Functioning Assessment for a previous still open noncriminal report.	38
15.	As part of conducting ongoing monitoring of its staff realignment, ensure realignment addresses workload needs in the units where Department staff reported staffing, caseload, and/or report reassignment as barriers to timeliness and make additional changes to its investigations positions as needed.	38

Summary information about our review of 125 sampled noncriminal reports

Table 6, which follows (see pages a-2 through a-13), presents the results of our review of a stratified random sample of 125 of 36,960 noncriminal reports of child abuse or neglect the Department received in fiscal year 2024 covering all 15 counties of the State (see Appendix D, pages d-1 through d-2, for more information on our sample). Specifically, in conducting our review of those noncriminal reports, we reviewed whether the Department completed key investigatory steps required by Department policy and did so within statutory and/or Department policy time frames, such as providing the Notice of Duty to Inform to individuals under investigation to notify them of their statutory rights and specific allegations made against them and completing a Family Functioning Assessment within 45 days that included all required Department policy elements to make a determination of the child's safety (see Finding 1, pages 14 through 19; Finding 2, pages 20 through 27; and Finding 3, pages 28 through 38, for more information about our review of the sampled noncriminal reports and Department investigator compliance with federal, statutory, and/or Department policy requirements).

Table 6
Number of days Department took to perform key investigative steps and status of investigative steps for 125 noncriminal reports we reviewed

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform ⁴	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
17	4	101	40	101	A	~	A	X
2	3	28	28	28	A	~	~	X
3	3	58	58	58	A	~	~	A
4 ^{7,8}	3	18	6	15	A	~	A	X
5 ^{7,8}	3	97	81	97	A	~	~	X
6	3	77	73	73	A	~	~	A
7	2	61	60	60	A	~	~	A
8	2	64	63	64	A	~	~	X
9	2	104	100	101	A	N/A	~	X
10	3	105	100	102	A	~	~	~
11	3	59	36	55	A	~	~	~

Completed and compliantNot completed/no evidence of completion

Completed but not compliant

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
12	3	73	64	70	A	~	~	~
13	3	56	54	56	~	~	~	~
14 ^{7,8}	3	15	2	12	X	X	~	X
15	3	58	57	58	A	~	~	A
16	3	113	110	90	A	~	~	X
17 ⁹	2	81	39	81	A	~	X	X
18	1	77	65	73	A	~	~	X
19	3	104	79	101	A	N/A	~	A
20	1	126	126	67	A	~	A	~
21	3	79	55	55	A	~	~	X
22	2	308	284	306	A	~	~	~
23	3	63	58	59	N/A	~	~	X



Completed but not compliant



Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform ⁴	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
248	3	54	51	53	A	~	~	A
25	2	188	176	36	X	X	A	~
26	3	55	51	55	X	~	~	X
27	2	184	184	184	X	~	~	X
28	1	144	105	144	A	~	A	X
29	3	56	54	55	A	~	~	A
30 ⁷	3	65	63	63	A	X	~	X
31	3	63	62	55	A	~	~	A
32	3	19	18	19	A	~	~	~
33 ⁸	3	23	22	23	A	~	~	~
34	2	9	3	9	A	~	~	X
35	2	9	9	9	A	✓	~	~



▲ Completed but not compliant

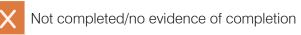


Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
36	3	61	59	59	A	~	~	A
37	3	22	N/A ¹⁰	3	A	~	~	~
38	3	45	44	45	A	~	~	A
39	3	74	70	73	A	~	~	A
40	3	53	37	37	A	~	~	A
41 ^{7,9}	1	13	4	12	A	~	X	X
42	1	15	11	13	~	~	~	~
43	3	30	27	28	A	~	~	~
44 ⁹	1	50	48	48	A	~	~	~
45	3	76	0	73	A	A	~	X
46 ⁷	2	16	12	9	A	~	A	X
47	2	59	51	51	A	~	~	A

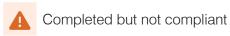


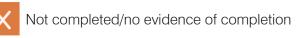




Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform ⁴	Interviews ⁵	Assessments and plans	Investigation finding notice ⁶
48	2	95	91	91	N/A	N/A	~	N/A
49	3	26	24	25	A	~	~	A
50	3	30	N/A ¹⁰	28	A	~	N/A ¹¹	~
51	2	50	8	50	A	~	A	A
52	3	15	3	4	A	A	~	A
53	3	17	14	14	A	~	~	A
54	3	8	4	4	A	~	~	A
55	3	21	15	15	A	~	~	A
56	2	147	146	147	A	~	~	A
57	3	20	13	15	A	~	~	A
58	3	103	100	102	A	A	A	~
59 ^{7,8}	2	55	19	34	A	~	~	A



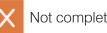




Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
60	2	29	27	29	A	~	A	
61	2	38	24	33	A	~	~	A
62	3	41	41	40	A	~	~	A
63	3	71	69	69	A	~	~	A
64	3	56	55	55	N/A	N/A	~	A
65	3	98	44	95	N/A	~	~	A
66	3	44	16	18	~	~	A	~
67	2	22	13	14	A	~	~	A
68	2	29	22	28	A	A	~	A
69	3	61	24	24	A	~	A	X
70	2	67	63	64	A	~	~	A
71	2	39	32	32	A	~	~	A







Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
72 ⁹	1	16	1	5	A	~	~	A
73 ⁹	1	46	45	45	A	~	A	A
74	3	29	27	27	X	X	A	A
75	3	45	41	42	A	~	~	A
76	3	30	8	30	N/A	~	~	N/A
77	3	19	15	16	~	~	~	A
78	3	28	25	25	~	~	~	A
79	2	59	55	56	A	~	~	~
80	3	159	155	156	A	~	~	~
81	2	52	20	48	A	~	~	A
82	3	58	50	50	A	~	~	A
83 ⁹	1	3	3	3	A	~	~	A





Completed but not compliant



Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform ⁴	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
84 ^{7,9}	2	151	133	151	A	~	X	X
85	3	47	37	39	N/A	~	~	A
86 ^{7,9}	1	116	98	115	A	~	A	X
87	3	25	21	25	A	~	~	A
88	3	55	54	54	N/A	N/A	~	N/A
89	2	59	54	59	A	~	~	A
90	3	24	20	17	A	~	~	A
91	3	41	40	40	X	X	A	A
92	3	109	108	108	A	~	~	X
93	2	52	42	42	A	~	~	X
94	2	13	12	12	A	~	~	A
95	3	56	46	56	N/A	~	~	N/A





Completed but not compliant



Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding ³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
96	2	31	28	29	A	~	~	A
97	3	24	21	23	A	~	~	~
98	3	59	59	59	A	~	~	~
99 ⁹	2	56	54	54	A	~	X	~
100	3	122	121	121	A	~	~	~
101	3	8	5	8	A	~	~	A
102 ^{7,8}	3	26	3	18	N/A	~	A	N/A
103	2	9	4	7	A	~	~	~
104 ⁹	1	38	36	38	A	~	~	~
105	3	21	9	19	A	~	~	~
106	3	66	61	66	A	~	A	A
107	3	66	14	47	A	~	~	~







Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
108	2	73	39	55	A	~	~	A
109	2	37	35	35	A	~	~	A
110	3	106	88	102	A	~	~	A
111 ^{7,8}	1	27	6	27	~	~	A	X
112	3	60	58	58	A	~	~	A
113	3	51	47	49	A	~	~	A
114	3	36	35	34	A	~	~	A
115 ⁷	1	25	2	25	A	~	~	X
116	2	95	88	90	A	~	~	X
117	3	64	63	63	N/A	~	~	~
118	3	92	91	92	A	~	~	~
119	2	43	29	32	A	~	A	A



▲ Completed but not compliant



Not completed/no evidence of completion

Sampled noncriminal report	Priority level	Days to close investigation ¹	Days to complete Family Functioning Assessment ²	Days to enter investigation finding³	Notice of Duty to Inform4	Interviews⁵	Assessments and plans	Investigation finding notice ⁶
120	3	72	69	70	A	~	~	A
121	3	90	90	90	A	A	~	A
122	3	40	36	40	A	~	~	A
123	3	65	64	64	A	~	~	A
124 ⁹	1	331	328	328	A	~	~	A
125	3	102	91	75	A	~	~	A
	Totals							
Completed and compliant (✓)		77	64	58	6	110	101	29
Completed but not compliant (A)		48	59	67	103	5	19	63
Not completed/no evidence of completion (X)		0	0	0	6	5	4	28
Not applicable (N/A)		0	2	0	10	5	1	5





Completed but not compliant



Not completed/no evidence of completion

- As discussed in Finding 3, page 31, the Department reviews whether investigations were or were not closed within 60 days to assess compliance with its policy requirement that investigators "make efforts" to close investigations within 60 days. As such, investigations closed within 60 days are completed and compliant, and investigations that were closed after 60 days are completed but not compliant.
- As discussed in the Introduction, pages 7 through 8, the Department's policy requires investigators to complete a Family Functioning Assessment within 45 days of the noncriminal report being assigned to a local field office. As such, Family Functioning Assessments completed within 45 days are completed and compliant, and Family Functioning Assessments that were completed after 45 days are completed but not compliant.
- As discussed in the Introduction, pages 8 through 9, the Department's policy and statute require investigators to submit their written investigation findings into the Department's case-management system within 45 days after receipt of the noncriminal report. As such, investigation findings entered into the Department's case-management system within 45 days are completed and compliant, and investigation findings that were entered into the Department's case-management system after 45 days are completed but not compliant.
- A Notice of Duty to Inform was not applicable if the Department was unable to locate or contact the alleged perpetrator or the alleged perpetrator refused engagement with the Department.
- An interview was not applicable if the Department was unable to contact the family or if the alleged perpetrator and/or alleged child victim refused to be interviewed.
- An investigation finding notice was not applicable if the Department was unable to contact the alleged perpetrator and did not have an address to send the notice to.
- As discussed in the Introduction, pages 7 through 8, the Department requires investigators to create a Safety Plan if they determine in the Family Functioning Assessment that a child is unsafe. In this noncriminal report, investigators determined the child was unsafe and created a Safety Plan.
- As discussed in the Introduction, page 6, the Department requires investigators to assess and determine if the child is in present danger. In this noncriminal report, investigators determined the child was in present danger and created a Present Danger Plan.
- As discussed in the Introduction, page 2, the Department requires investigators to investigate noncriminal reports where the alleged child victim is a substance-exposed newborn. This noncriminal report involved a child who was alleged to have been born substance-exposed.
- As discussed in Finding 3, pages 29 through 30, this noncriminal report involved a foster parent who was the alleged perpetrator of an alleged foster child victim. Department policy states that a Family Functioning Assessment does not need to be completed for a report involving a foster parent unless the alleged child victim is the foster parent's biological or adopted child.
- The key assessments and plans were not applicable for this noncriminal report because the alleged child victim was not found to be in present or imminent danger, and a Family Functioning Assessment was not required (see footnote 10 for more information about why a Family Functioning Assessment was not required for this noncriminal report).

Source: Auditor General staff review of Department policy, investigative documents in the Department's case-management system and from the Department's hard copy files, and Departmentprovided information for a sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024.

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Summary information about allegations and finding determinations in 125 sampled noncriminal reports

Table 7, which follows (see pages b-2 through b-13), summarizes the allegation(s) and finding determination(s) from our review of a stratified random sample of 125 of 36,960 noncriminal reports of child abuse or neglect the Department received in fiscal year 2024 covering all 15 counties of the State (see Appendix D, pages d-1 through d-2, for more information on our sample). Of the 125 noncriminal reports we reviewed, 15 had allegations proposed substantiated, 103 had allegations unsubstantiated, 5 had allegations that were both proposed substantiated and unsubstantiated, and 2 had an investigation finding of unable to locate (see Introduction, pages 8 through 9, for more information about the Department's investigation findings).¹

Additionally, our review of Department-provided data for all 36,738 noncriminal reports it received in fiscal year 2024 that had allegation findings entered in the Department's case-management system as of December 2024 found that 3,030 had allegations proposed substantiated/ substantiated, 30,440 had allegations unsubstantiated, 945 had an investigation finding of unable to locate, and 2,323 had a combination of proposed substantiated/substantiated, unsubstantiated, and/or unable to locate investigation findings.^{2,3}

A noncriminal report can include more than 1 allegation of noncriminal child abuse and/or neglect, and the Department makes a finding determination for each allegation.

According to Department case-management system data, as of December 2024, 222 noncriminal reports received in fiscal year 2024 did not have allegation findings entered in the Department's case-management system.

According to Department case-management system data, it received 42,336 reports of alleged child abuse and neglect in fiscal year 2024, and 5,376 of these reports were criminal reports of alleged child abuse and neglect (see Introduction, pages 2 through 4, for more information about how the Department determines whether reports of alleged child abuse and neglect contain allegations of criminal conduct). Our review of Department-provided data for all 5,374 criminal reports it received in fiscal year 2024 that had allegation findings entered in the Department's case-management system as of December 2024 found that 834 had allegations proposed substantiated/substantiated, 3,377 had allegations unsubstantiated, 79 had an investigation finding of unable to locate, and 1,084 had a combination of the proposed substantiated/substantiated, unsubstantiated, and/or unable to locate investigation findings. According to Department case-management system data, as of December 2024, 2 criminal reports received in fiscal year 2024 did not have allegation findings entered in the Department's case-management system.

Table 7

Department investigators investigated and entered finding determinations of unsubstantiated, proposed substantiated, and/or unable to locate for the 125 noncriminal reports we reviewed^{1,2}

Sampled noncriminal report	Allegation(s)
	Proposed substantiated
1	Neglect: caregiver unable or unwilling to meet child's needsNeglect: injuries due to neglect or failure to supervise
	Unsubstantiated
	Neglect: caregiver unable to perform parental responsibilities
2	 Neglect: significant incident or repeated exposure to domestic violence Emotional abuse: incident or repeated pattern of behavior directed toward child/interferes with normal functioning
0	Unsubstantiated
3	Physical abuse: caregiver physically or verbally imposing/threatening
1	Proposed substantiated
4	Neglect: living environment is a threat to child's safety
5	Proposed substantiated
	Neglect: living environment is a threat to child's safety
6	Unsubstantiated
	Physical abuse: caregiver physically or verbally imposing/threatening
7	Unsubstantiated
	Neglect: living environment is a threat to child's safety
8	Unsubstantiated
	Neglect: caregiver allows known sexual predator access to child
9	Unsubstantiated
	Neglect: caregiver unwilling or unable to meet child's needs
	Unsubstantiated
10	Physical abuse: caregiver allows/provides substances that may cause/ caused harm
	Neglect: caregiver allows/provides substances that may cause/caused harm

Sampled noncriminal report	Allegation(s)
11	 Unsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
12	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
13	UnsubstantiatedNeglect: caregiver allows known sexual predator access to child
14	Proposed substantiatedNeglect: caregiver is absent
15	 Veglect: living environment is a threat to child's safety Neglect: caregiver allows/provides substances that may cause/caused harm Physical abuse: caregiver allows/provides substances that may cause/caused harm
16	 Vnsubstantiated Neglect: living environment a threat to child's safety Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver Neglect: caregiver unwilling or unable to meet child's needs
17	Proposed substantiatedNeglect: substance-exposed newborn or infant
18	UnsubstantiatedNeglect: unwilling or unable to meet child's needs for medical healthcare
19	 Veglect: child extremely fearful due to threat or present circumstance Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver

Sampled noncriminal report	Allegation(s)
20	 Unsubstantiated Neglect: caregiver allows known sexual predator access to child Neglect: unwilling or unable to meet child's needs for medical care
21	 Unsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
22	 Vnsubstantiated Neglect: caregiver unwilling or unable to meet child's needs Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
23	 Unsubstantiated Physical abuse: unknown injuries but observed to be forcefully struck Physical abuse: caregiver is physically or verbally imposing/threatening
24	 Proposed substantiated Physical abuse: other bodily injuries Unsubstantiated Neglect: caregiver unwilling or unable to meet child's needs Physical abuse: caregiver is physically or verbally imposing/threatening
25	 Unsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
26	 Vinsubstantiated Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others Physical abuse: caregiver is physically or verbally imposing/threatening
27	UnsubstantiatedNeglect: caregiver unable to perform parental responsibilities
28	Proposed substantiatedNeglect: injuries due to neglect or failure to supervise

Sampled noncriminal report	Allegation(s)
29	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
30	UnsubstantiatedPhysical abuse: other bodily injuries
31	UnsubstantiatedNeglect: caregiver allows known sexual predator access to child
32	UnsubstantiatedNeglect: living environment is a threat to child's safety
33	Proposed substantiatedNeglect: significant incident or repeated exposure to domestic violence
34	 Proposed substantiated Neglect: caregiver unable to perform parental responsibilities Unsubstantiated Physical abuse: caregiver failed to protect/placed in dangerous situation Neglect: significant incident or repeated exposure to domestic violence
35	 Unsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
36	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
37	 Unsubstantiated Physical abuse: other bodily injuries Physical abuse: caregiver is physically or verbally imposing/threatening
38	 Unsubstantiated Physical abuse: caregiver is physically or verbally imposing/threatening Physical abuse: other bodily injuries Physical abuse: caregiver failed to protect/placed in dangerous situation
39	UnsubstantiatedNeglect: caregiver unwilling or unable to meet child's needs

Sampled noncriminal report	Allegation(s)
40	UnsubstantiatedPhysical abuse: other bodily injuries
41	Proposed substantiatedNeglect: substance exposed newborn or infant
42	UnsubstantiatedNeglect: unwilling or unable to meet child's needs for medical care
43	UnsubstantiatedNeglect: unwilling or unable to meet child's needs for medical care
44	UnsubstantiatedNeglect: substance exposed newborn or infant
45	 Unsubstantiated Neglect: recklessly or deliberately exposed to sexually explicit materials or acts
46	 Proposed substantiated Neglect: significant incident or repeated exposure to domestic violence Neglect: caregiver is absent
47	 Unsubstantiated Neglect: living environment is a threat to child's safety Neglect: caregiver unwilling or unable to meet child's needs
48	Unable to locateNeglect: significant incident or repeated exposure to domestic violence
49	 Proposed substantiated Neglect: child in close proximity and/or injured during incident of domestic violence Unsubstantiated Physical abuse: caregiver is physically or verbally imposing/threatening
50	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening

Sampled noncriminal report	Allegation(s)
	Unsubstantiated
51	 Neglect: significant incident or repeated exposure to domestic violence Neglect: child in close proximity and/or injured during incident of domestic violence
	Physical abuse: child in close proximity and/or injured during incident of domestic violence
5 0	Unsubstantiated
52	Physical abuse: caregiver is physically or verbally imposing/threatening
	Unsubstantiated
53	Neglect: living environment is a threat to child's safety
	Physical abuse: caregiver is physically or verbally imposing/threatening
	Unsubstantiated
54	Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
	Physical abuse: caregiver is physically or verbally imposing/threatening
	Physical abuse: caregiver failed to protect/placed in dangerous situation
5 5	Unsubstantiated
55	Physical abuse: unknown injuries but observed to be forcefully struck
50	Unsubstantiated
56	Neglect: significant incident or repeated exposure to domestic violence
	Unsubstantiated
57	Emotional abuse: incident or pattern of behavior directed toward child/ interferes with normal functioning
	Unsubstantiated
58	Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
F0	Proposed substantiated
59	Neglect: caregiver unable to perform parental responsibilities

Sampled noncriminal report	Allegation(s)
60	 Unsubstantiated Physical abuse: child in close proximity and/or injured during incident of domestic violence
61	 Unsubstantiated Neglect: living environment is a threat to child's safety Neglect: significant incident or repeated exposure to domestic violence
62	UnsubstantiatedNeglect: significant incident or repeated exposure to domestic violence
63	 Unsubstantiated Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
64	UnsubstantiatedNeglect: caregiver is absent
65	UnsubstantiatedPhysical abuse: other bodily injuries
66	 Unsubstantiated Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
67	UnsubstantiatedNeglect: living environment is a threat to child's safety
68	UnsubstantiatedNeglect: significant incident or repeated exposure to domestic violence
69	UnsubstantiatedNeglect: unwilling or unable to meet child's needs for medical care
70	UnsubstantiatedPhysical abuse: caregiver failed to protect/placed in dangerous situation

Sampled noncriminal	
report	Allegation(s)
	Unsubstantiated
71	Neglect: significant incident or repeated exposure to domestic violence
	 Sexual abuse: persistent, highly sexualized behavior (predatory) outside of age appropriate sexual exploration
72	Unsubstantiated
12	Neglect: substance exposed newborn or infant
70	Unsubstantiated
73	Neglect: substance exposed newborn or infant
7.4	Unsubstantiated
74	Neglect: caregiver unwilling or unable to meet child's needs
7.5	Unsubstantiated
75	Physical abuse: caregiver is physically or verbally imposing/threatening
76	Unsubstantiated
76	Neglect: caregiver unwilling or unable to meet child's needs
	Unsubstantiated
77	Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
	Unsubstantiated
78	Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
70	Unsubstantiated
79	Neglect: significant incident or repeated exposure to domestic violence
00	Unsubstantiated
80	Physical abuse: caregiver is physically or verbally imposing/threatening
01	Unsubstantiated
81	Neglect: significant incident or repeated exposure to domestic violence
82	Unsubstantiated
UZ.	Neglect: living environment is a threat to child's safety

Sampled noncriminal report	Allegation(s)
83	UnsubstantiatedNeglect: substance exposed newborn or infant
84	 Proposed substantiated Neglect: substance exposed newborn or infant Neglect: caregiver unable to perform parental responsibilities
85	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
86	 Proposed substantiated Neglect: substance exposed newborn or infant Neglect: caregiver unwilling or unable to meet child's needs
87	Proposed substantiatedNeglect: significant incident or repeated exposure to domestic violence
88	UnsubstantiatedNeglect: living environment is a threat to child's safety
89	 Proposed Substantiated Neglect: caregiver unwilling or unable to meet child's needs Unsubstantiated Physical abuse: caregiver is physically or verbally imposing/threatening
90	 Unsubstantiated Physical abuse: caregiver is physically or verbally imposing/threatening Physical abuse: other bodily injuries
91	 Vnsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver Neglect: unwilling or unable to meet child's needs for medical care Physical abuse: caregiver is physically or verbally imposing/threatening
92	UnsubstantiatedNeglect: caregiver is absent

Sampled noncriminal report	Allegation(s)
93	 Unsubstantiated Neglect: significant incident or repeated exposure to domestic violence Physical abuse: other bodily injuries
94	UnsubstantiatedNeglect: caregiver unwilling or unable to meet child's needs
95	Unable to locateNeglect: significant incident or repeated exposure to domestic violence
96	 Unsubstantiated Neglect: caregiver unwilling or unable to meet child's needs Neglect: injuries due to neglect or failure to supervise
97	 Unsubstantiated Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
98	UnsubstantiatedPhysical abuse: face or head injury
99	UnsubstantiatedNeglect: substance-exposed newborn or infant
100	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
101	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
102	UnsubstantiatedNeglect: caregiver unable to perform parental responsibilities
103	UnsubstantiatedNeglect: caregiver allows known sexual predator access to the child
104	UnsubstantiatedNeglect: substance-exposed newborn or infant

Sampled noncriminal report	Allegation(s)
105	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
106	 Unsubstantiated Neglect: unable/unwilling to control child's behavior that threatens serious or severe harm to self or others
107	UnsubstantiatedPhysical abuse: other bodily injuries
108	UnsubstantiatedNeglect: caregiver allows known sexual predator access to the child
109	UnsubstantiatedNeglect: living environment is a threat to child's safety
110	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
111	Proposed substantiated Neglect: caregiver is absent
112	UnsubstantiatedNeglect: significant incident or repeated exposure to domestic violence
113	UnsubstantiatedPhysical abuse: caregiver is physically or verbally imposing/threatening
114	 Unsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver
115	Proposed substantiated Neglect: caregiver is absent
116	 Proposed substantiated Physical abuse: caregiver failed to protect/placed in dangerous situation Unsubstantiated Neglect: living environment is a threat to child's safety

Sampled noncriminal report	Allegation(s)
117	 Vnsubstantiated Neglect: unrealistic expectations, predominately negative terms, or distorted view of child by caregiver Physical abuse: caregiver failed to protect/placed in dangerous situation
118	UnsubstantiatedPhysical abuse: face or head injury
119	 Unsubstantiated Physical abuse: other bodily injuries Physical abuse: caregiver is physically or verbally imposing/threatening
120	 Unsubstantiated Neglect: significant incident or repeated exposure to domestic violence Neglect: living environment is a threat to child's safety
121	 Unsubstantiated Neglect: unwilling or unable to meet child's needs for medical care Emotional abuse: incident or pattern of behavior directed toward child/interferes with normal functioning
122	UnsubstantiatedNeglect: caregiver unable to perform parental responsibilities
123	UnsubstantiatedNeglect: caregiver unwilling or unable to meet child's needs
124	UnsubstantiatedNeglect: substance-exposed newborn or infant
125	UnsubstantiatedPhysical abuse: other bodily injuries

This table includes the specific allegation(s) type involved in each noncriminal report we reviewed. An allegation is specific to the alleged perpetrator and alleged child victim, and some of the noncriminal reports we reviewed involved multiple alleged perpetrators and alleged child victims. As such, in some noncriminal reports, the same allegation description listed in Table 7 was investigated multiple times due to the number of alleged child victims and/or number of alleged perpetrators. According to the Department, there were a total of 338 unique allegations across the 125 noncriminal reports we reviewed.

Source: Auditor General staff review of investigative documents in the Department's case-management system for a sample of 125 of 36,960 noncriminal reports the Department received in fiscal year 2024.

² This table includes the investigator's finding determinations entered at the time of the investigation.

Investigatory documents provided to individuals involved in noncriminal reports

As discussed in the Introduction, pages 7 through 9, the Department provides documents to individuals under investigation to inform them of their statutory rights during a Department investigation, specific allegations made against them, and the outcome of the Department's investigation. The Department has template notice documents that investigators update with relevant information related to the investigation to provide to the individuals under investigation. Figure 6, pages c-2 through c-3, is the Department's Notice of Duty to Inform, which provides individuals under Department investigation information about their statutory rights and specific allegations made against them. Figure 7, page c-4, is the Department's Notice of Unsubstantiated Child Safety Report, which provides individuals under Department investigation notice that the allegations made against them were found to be unsubstantiated. Figure 8, page c-5, is the Department's Notice of Proposed Substantiation of Child Safety Report, which provides individuals under Department investigation notice that credible evidence exists supporting the allegations and the Department is proposing to substantiate the allegations.

Figure 6

Department's Notice of Duty to Inform form includes information for individuals under Department investigation about their statutory rights and specific allegations made against them¹

Notice of Duty to Inform



Investigation of Allegation(s)

When the Department of Child Safety (DCS) receives an allegation of child abuse or neglect by a parent, guardian, custodian, or adult member of the household and a report is taken, Arizona law requires DCS to investigate.

Please include all Intake Numbers associated with the NDI.

The following allegation(s) concerning your child (or children) is currently being investigated by DCS:
Specific Allegation(s):

This notice is to inform you that:

- DCS has the authority by A.R.S. 8-802(B), A.R.S. 8-471(E)(3), and A.A.C. R-21-4-103(F) to interview a child without notice to or consent of the parent, guardian or custodian.
- DCS has no legal authority to compel or make you cooperate
 with the investigation or to accept services, but it is our hope that
 by working together we can find solutions to ensure that your
 child (or children) is safe and that your family has what it needs.
- DCS has a duty to proceed with the investigation even if you
 decide not to cooperate to ensure that your child (or children) is
 safe, although we would prefer to carry on with the investigation
 with your support.
- DCS has the authority to petition the Juvenile Court for a
 determination that your child (or children) is dependent
 and in need of protection. Your refusal to cooperate with the
 investigation or services offered does not in itself form a basis
 for DCS to take temporary custody of your child (or children),
 unless it is clearly necessary to protect your child (or children)
 from abuse or neglect.
- You may deny DCS entry into your home, unless DCS obtains a court order.
- You have the right to seek the advice of an attorney and to have an attorney present during your interviews.
- You have the right to provide written, telephonic or verbal responses to the allegation, including any documentation, and to have the information considered in determining whether your child (or children) is in need of DCS intervention.
- Any information that you provide in response to the complaint or allegation(s) will be considered during the investigation.

- Anything you say or write can be used in a court proceeding and may be included in DCS's report of the investigation.
- Any written response that you provide, including any documentation, will be included in the DCS case record.
- You may refuse to sign a release of information, consent to drug or alcohol testing, or submit to a mental health evaluation.
- You have the right to appeal determinations made by DCS about the results of the investigation and will be notified in writing of these results and how to appeal.

More information about DCS and your parental rights are outlined in the pamphlet, "A Guide to the Department of Child Safety" that I am leaving with you today.

- You may call the DCS Office of the Ombudsman to file a
 complaint regarding services, actions, lack of actions, or
 treatment by the DCS staff. The Office of the Ombudsman will
 review your complaint and determine the type of response
 needed. The office may be reached via email at Ombudsman@azdcs.gov or by telephone at 1-877-527-0765 or (602) 364-0777.
- You have the right to file a complaint with the Arizona
 Ombudsman-Citizens' Aide. You may do so via their website
 complaint site at https://www.azoca.gov/complaint-procedure/,
 email at Ombuds@azoca.gov, or telephone (602) 277-7292. The
 Arizona Ombudsman-Citizens' Aide Office is an independent
 ombudsman office with legal authority to handle inquiries
 and examine administrative actions of Arizona state agencies,
 including DCS.

Acknowledgment

By initialing page 1 of this form, you are acknowledging that the DCS Specialist has reviewed the allegations and the above information contained in this notice with you.

Initials	Date

CSO-1005A (07/25)

Figure 6 continued

43N: 18 ine chi		Amoniaga Ind	li au le aui	t a ~ a / a								
Yes	No [American Ind	ian neri	iage/a	ncesiry:							
_		Circiowii	Please expl	ain if unl	known							
f Yes,												
Mother's Tribe			Father's Tr									
	you identify you											
nformation collec	cted will assist the Do	American In or Alaska Na	dian A	the cult isian	Black or African American	Native Hawaiia or other Pacific Islander	an Wh		oanic atino	Unknown	Decline	d
Parent Parent]
ASK: Please te	ll me how you id	lentify your <u>r</u> a	ce/ethni	city.								
	ll me what you k rild(ren) is adop						does yo	ur child	(ren) ide	entify as?		
ASK: If your cl Signatures By signing page 2		ted or you are	the lega.	l guar	dian, what t	race/ethnicity					have been	
ASK: If your cl Signatures By signing page 2 provided the pam	nild(ren) is adop	ted or you are	the lega that the Do Child Safe	l guar CS Spec CS Spec	dian, what t	vace/ethnicity wed the informa					have been	
ASK: If your cl Signatures By signing page 2 provided the pam	of this form, you ar phlet "A Guide to th	ted or you are	the legal that the DG Child Safe Parent, Gua	l guar CS Spec Spec Spec Spec Spec Spec Spec Spec	dian, what i	wed the information		ined in th		with you, you	have been	

Page 1 of the Notice of Duty to Inform indicates that Department staff leave a "Guide to the Department of Child Safety" with the individual. The Guide to the Department of Child Safety is a 20-page document intended to help those under investigation better understand the Department. The Guide to the Department of Child Safety includes information for individuals such as the definitions of abuse and neglect, how the Department receives information about a family, how the Department investigates reports of abuse and neglect, the rights of an individual(s) under investigation, court involvement and types of hearings, Department services available to a family, and additional resources for assistance.

Source: Department's Notice of Duty to Inform as of July 21, 2025.

Figure 7

Department's Notice of Unsubstantiated Child Safety Report form letter intended to provide individuals under Department investigation notice that the allegations made against them were found to be unsubstantiated



Kathryn Ptak, Director Katie Hobbs, Governor

Date: Today's Date (MMMM dd, yyyy)

Notice of Unsubstantiated Child Safety Report

Caregiver's Name No., Street City, State, Zip

RE: Report No.

Dear Caregiver's Name,

On Report Date (MMMM dd, yyyy), the Department of Child Safety (DCS) received a report of suspected child abuse, neglect or abandonment regarding a child or children in your care, custody or control. Based upon the information collected through an investigation of this report, the report has been unsubstantiated and based on the results of the investigation:

Your case will remain open and DCS will partner with you to help strengthen and support your family.

DCS has offered/recommend the following services as a result of the investigation:

None.

Thank you for your cooperation and assistance with this investigation. Child safety is of the utmost importance to us. If you have any further questions, please contact me at Representative's phone number (xxx-xxx-xxxx) or Representative's e-mail.

Sincerely,

Representative's Name Representative's Title Phone No. and/or Site Code Local Office Address LO City, AZ LO ZIP Code

Equal Opportunity Employer/Program. The Department of Child Safety (DCS) prohibits discrimination in admissions, programs, services, activities, or employment based on race, color, religion, sex, national origin, age, disability, genetics, or retaliation or any other status protected by federal law, state law, or regulation. Reasonable accommodations to allow a person with a disability to take part in a program, service, or activity are available upon request. To request this document in alternative format or for further information about this policy contact your local office. TTY/TDD Services: 7-1-1. Free language assistance for DCS services is available upon request. Ayuda gratuita con traducciones relacionadas con los servicios del DCS esta disponible a solicitud del cliente.

CSO-1023A (10/24)

Source: Department's Notice of Unsubstantiated Child Safety Report as of June 3, 2025.

Figure 8

Department's Notice of Proposed Substantiation of Child Safety Report form intended to provide individuals under Department investigation notice that credible evidence exists supporting the allegations and the Department is proposing to substantiate the allegations¹

	PARTMENT OF HILD SAFETY	
	IILD SAFETT	Kathryn Ptak, Director Katie Hobbs, Governor
	Notice of Proposed Substantiation of Child	Safety Report
	4	
Re:	Intake Number(s)	Date
_		
Dear	Caregiver's Name	
	On	the Department of Child Safety (DCS) received one
	Report Date(s) or more reports of suspected child abuse, neglect or abandonmen	nt regarding a child or children in your care, custody or control. The investigation
	has been completed, and based on the results of that investigation	
	The Assessment will be closed and a case will not be opened to	
	DCS will open a case for ongoing services and partner with yo DCS has offered/recommend the following services as a result of the	
	After completing its investigation, if DCS has reason to believe that to substantiate the allegation of abuse or neglect.	the parent, guardian or custodian abused or neglected the child, DCS will propose
	to substantiate the allegation of abuse or neglect.	the parent, guardian or custodian abused or neglected the child, DCS will propose this Report, DCS found credible evidence supporting the allegations, and is
	to substantiate the allegation of abuse or neglect. Based upon the information collected through the investigation of a proposing to substantiate the Report.	this Report, DCS found credible evidence supporting the allegations, and is
	to substantiate the allegation of abuse or neglect. Based upon the information collected through the investigation of the proposing to substantiate the Report. In cases where DCS proposes to substantiate an allegation of abuse Juvenile Court, the proposed substantiation will be forwarded to the	this Report, DCS found credible evidence supporting the allegations, and is
	to substantiate the allegation of abuse or neglect. Based upon the information collected through the investigation of the proposing to substantiate the Report. In cases where DCS proposes to substantiate an allegation of abuse Juvenile Court, the proposed substantiation will be forwarded to the If PSRT agrees with the decision to substantiate, the person whom the about their rights and how to appeal.	this Report, DCS found credible evidence supporting the allegations, and is or neglect that does not involve DCS filing a dependency petition with the e DCS Protective Services Review Team (PSRT) for review.
	to substantiate the allegation of abuse or neglect. Based upon the information collected through the investigation of the proposing to substantiate the Report. In cases where DCS proposes to substantiate an allegation of abuse Juvenile Court, the proposed substantiation will be forwarded to the If PSRT agrees with the decision to substantiate, the person whom the about their rights and how to appeal. Thank you for your cooperation and assistance with this investigation questions, please contact me at the information provided below.	this Report, DCS found credible evidence supporting the allegations, and is or neglect that does not involve DCS filing a dependency petition with the e DCS Protective Services Review Team (PSRT) for review. the allegation is being made against will receive a letter from PSRT with information
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Source: Department's Notice of Proposed Substantiation of Child Safety Report as of June 3, 2025.

See Introduction, pages 8 through 9, for more information about proposed substantiation of a noncriminal report.

Scope and methodology

The Arizona Auditor General has conducted this special audit of the Department pursuant to a September 18, 2024, resolution of the Joint Legislative Audit Committee.

We used various methods to address the audit's objectives. These methods included reviewing State statute and federal law; the Department's website; and Department policies, procedures, and guidance for noncriminal child abuse and neglect investigations; and interviewing Department staff.

In addition, we used the following specific methods to meet the audit's objectives:

- To determine whether the Department investigated noncriminal child abuse and neglect reports it received in fiscal year 2024 as required by statute and Department policy, we reviewed:
 - The Department's case-management system, Department-provided hard copy files, Department-provided information, and Department case-management system data as of December 2024 for all 36,960 noncriminal reports it received in fiscal year 2024 for a stratified random sample of 125 of 36,960 noncriminal child abuse and neglect reports the Department received in fiscal year 2024.¹ Specifically, we randomly sampled between 5 and 49 noncriminal reports from all 15 counties allocating larger sample sizes to more populous counties (see textbox, page d-2, for more information about the number of sampled noncriminal reports by county).
 - Department's case-management system investigation finding entry data as of December 2024 for 33,211 noncriminal reports the Department received in fiscal year 2024.²
 - Department case-management system data, as of April 10, 2025, for report closure status and closure date, if applicable, for all 36,960 noncriminal reports the Department received in fiscal year 2024.
 - Child Welfare League of American (CWLA)-provided information on child welfare investigation research, recommended practices, and practice wisdom.³

We reviewed investigatory case notes in the Department's case-management system, including case notes about interviews and contact with the alleged child victim, alleged perpetrators, law enforcement, and medical professionals. Additionally, as applicable, we also reviewed Family Functioning Assessments, Safety Plans, Present Danger Plans, substance-exposed newborn plans, noncriminal report allegations and findings, the Notice of Duty to Inform, letters informing individuals of the finding outcomes, and supervisory review documentation in the Department's case-management system.

Although the Department received 36,960 noncriminal reports in fiscal year 2024, we were unable to assess investigation finding timeliness for 3,749 of these noncriminal reports because the Department's case-management system data did not include an investigation finding date, the original date the investigator entered their investigation finding into the case-management system, or included both timely and untimely investigation finding dates for allegations on the same noncriminal report.

We contracted with CWLA, a coalition of public and private agencies whose mission is to advance equity through policies and practices that ensure the well-being of children, youth, families, and communities, to obtain expert consulting services related to child welfare agency practices.

- A 2018 issue brief from Casey Family Programs.⁴
- The Department's June 2025
 Monthly Operational Outcomes
 Report.
- The Arizona Ombudsman Citizen's Aide's fiscal year 2024 annual report.
- Research on the impacts of stressful events and trauma on human memory formation, retention, and recall.⁵
- To obtain information on the different types of child abuse and neglect reports that the Department investigates, including criminal and noncriminal, we reviewed Department policies and procedures for child abuse and neglect investigations and A.R.S. §§8-201 and 8-455.
- To obtain information for Other Pertinent Information 1, we reviewed CWLAprovided information on child welfareinvestigation research, recommended practices, and practice wisdom.
- To obtain information for Other Pertinent Information 2, we reviewed Department case-management system data as of December 2024 regarding Department investigators' initial response times for all 36,960 noncriminal reports of child abuse or neglect the Department received in fiscal year 2024. We also reviewed the Department's case-

Noncriminal child abuse and neglect reports sampled by county

For the 125 sampled noncriminal reports, we randomly selected the following number of reports the Department received in fiscal year 2024 by county:

▶ Apache County: 5 of 154

Cochise County: 5 of 680

Coconino County: 5 of 586

▶ Gila County: 5 of 276

► Graham County: 5 of 164

► Greenlee County: 5 of 63

La Paz County: 5 of 86

Maricopa County: 49 of 22,542

Mohave County: 5 of 1,233

Navajo County: 5 of 555

Pima County: 11 of 6,047

Pinal County: 5 of 2,464

Santa Cruz County: 5 of 143

Yavapai County: 5 of 1,020

Yuma County: 5 of 947

Source: Auditor General staff review of Department fiscal year 2024 noncriminal child abuse and neglect-investigation data.

Casey Family Programs (2018). Issue brief: Safe children—How does investigation, removal, and placement cause trauma for children. Retrieved 6/24/2025 from https://www.casey.org/media/SC Investigation-removal-placement-causes-trauma.pdf

Quaedflieg, C., & Schwabe, L. (2018). Memory dynamics under stress. Memory, 26(3), 364-376. Retrieved 8/25/2025 from https://doi.org/10.1 080/09658211.2017.1338299; Guenzel, F. M., Wolf, O. T., & Schwabe, L. (2013). Stress disrupts response memory retreival. Psychoneuroendocrinology, 38(8), 1460-1465. Retrieved 8/25/2025 from http://dx.doi.org/10.1016/j.psyneuen.2012.12.010; and Shields, G. S., et al. (2017). The effects of acute stress on episodic memory: A meta-analysis and integrative review. Psychological Bulletin, 143(6), 636–675. Retrieved 8/25/2025 from https://doi.org/10.1037/bul0000100

- management system for a stratified random sample of 125 of 36,960 noncriminal child abuse and neglect reports the Department received in fiscal year 2024.
- ▶ To obtain information for Appendices A and B, we reviewed documentation in the Department's case-management system and Department-provided hard copy documents for a stratified random sample of 125 of 36,960 noncriminal reports of child abuse or neglect the Department received in fiscal year 2024. For Appendix B, we also reviewed Department case-management system data as of December 2024 for all 42,336 reports of alleged child abuse and neglect, criminal and noncriminal, that the Department received in fiscal year 2024.
- To obtain information for Appendix C, we reviewed templates of Department investigative documents provided to individuals involved in noncriminal reports.
- ▶ To obtain information for the Introduction, we reviewed Department-provided data on open reports as of March 27, 2025, Department-prepared information regarding investigator staffing and vacancies, State Senate documentation, session laws, Governor executive orders, the Indian Child Welfare Act, Department Memorandums of Agreement with Native American tribes, the Department's June 2025 Monthly Operational Outcomes Report, and a stratified random sample of 125 of 36,960 noncriminal reports of child abuse or neglect the Department received in fiscal year 2024.

We selected our audit sample(s) to provide sufficient evidence to support our findings, conclusions, and recommendations. Unless otherwise noted, the results of our testing using these samples were not intended to be projected to the entire population.

When relying on Department-provided data to support our findings and conclusions, we performed certain tests to ensure the data was sufficiently valid, reliable, and complete to meet the audit objectives. Unless otherwise noted, we determined the Department-provided data was sufficiently valid, reliable, and complete for audit purposes.

We express our appreciation to Director Ptak and Department staff for their cooperation and assistance throughout the audit.

DEPARTMENT RESPONSE

The subsequent pages were written by the Department to provide a response to each of the findings and to indicate its intention regarding implementation of each of the recommendations resulting from the audit conducted by the Arizona Auditor General.





September 8, 2025

Lindsey Perry, CPA, CFE Auditor General Arizona Office of the Auditor General 2910 North 44th Street, Suite 410 Phoenix, Arizona 85018

RE: Special audit of the Arizona Department of Child Safety – Investigations of noncriminal child abuse and neglect reports

Dear Ms. Perry:

On behalf of the Arizona Department of Child Safety, we acknowledge the audit of our processes for investigating noncriminal reports of child abuse and neglect.

The findings and recommendations outlined in the report have been carefully reviewed. Informing individuals under investigation about their rights and the specific allegations made against them, as well as ensuring prompt documentation of investigative activities while prioritizing child safety and balancing adherence to statutes, timeframes, policies and procedures when investigating families suspected of abuse and neglect is critical.

The Department appreciates the recognition of the 97% compliance rate for initial contact with alleged child victims in fiscal year 2024 and the 75% reduction of open reports from 2015 through 2025. Additionally, the Child Welfare League of America's (CWLA) acknowledgment of the Department's investigative policies and procedures including a structured risk assessment, legally grounded findings and firm timelines that support accountability, child safety and transparent decision making in this report is also appreciated. These findings reflect the Department's commitment to child safety, procedural integrity and continuous improvement.

Attached is the formal response to the findings and recommendations that outline the actions taken and those that will be taken to strengthen policies, improve documentation practices and enhance the timeliness and quality of investigations.

Sincerely,

Kathryn Ptak Director

Enclosure: DCS Recommendation Response

Finding 1: Department did not always inform individuals under noncriminal investigation of their rights and/or specific allegations against them in writing as required, putting the Department at risk of being unable to demonstrate it did not violate individuals' statutory rights and potentially hindering individuals' understanding of their rights and specific allegations against them.

Department response: The Auditor General's finding is agreed to.

<u>Response explanation:</u> While the Department verbally informed individuals of their rights and/or specific allegations, it is important to provide written notice. The Department is dedicated to informing individuals of their statutory rights and specific allegations verbally and in writing.

Recommendation 1: Inform all individuals under investigation of their statutory rights and specific allegations against them verbally and in writing and upload all Notices of Duty to Inform as evidence of these notifications to the Department's case-management system, as required by statute and/or Department policy.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department will continue to inform individuals under investigation verbally and in writing of their rights and specific allegations and upload Notices of Duty (NDI) documents to the case management system. However, there are exceptions where NDIs may not be available for upload. In certain situations, such as when the Department is unable to locate the family or an individual exercises their right not to cooperate with the investigation, an NDI may not be provided and uploaded. Therefore, the Department will establish a reasonable target for uploading NDIs.

A review of an assessment case record for the completion of uploading the NDI into the electronic case records is part of the *DCS-2096 - Administrative Review Tool*. This review process must be completed by DCS Program Supervisors when closing or transferring an assessment, thereby supporting the continued implementation of this recommendation.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews as informing individuals of their rights and specific allegations and uploading the Notices of Duty to Inform is a continuous requirement for all current and future investigations.

Recommendation 2: Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of informing individuals under investigation of their statutory rights and specific allegations made against them verbally and in writing and properly documenting that notification in the Department's case-management system, as required by Department policy.

Department response: The audit recommendation will be implemented.

<u>Response explanation:</u> The Department agrees to emphasize the importance of informing individuals under investigation of their statutory rights and specific allegations made against them verbally and in writing and properly documenting that notification in the Department's case-management system. However, the Department will not develop or require additional training.

The Department will continue to require newly hired DCS Specialists and DCS Program Supervisors to successfully complete all the requirements of DCS Specialist Core Training and Supervisor Core Training. DCS Specialist Training includes training competencies in providing, reviewing and documenting the notification of rights and allegations. Supervisor Core Training includes information in the Clinical Supervision, Legal and Supervising SAFE AZ modules for ensuring DCS Specialists provide notification of rights and allegations.

The Department will continue its Supervision Coach Program, a continuous learning and improvement journey, for newly hired DCS Program Supervisors. This program aids in the transfer of learning from classroom training to field practice by following a parallel process. This program allows for observation and feedback during clinical supervision on investigative responsibilities including confirmation that the notification of rights and allegations occurred and were documented. This process ensures supervision, assessment and determination will be the same regardless of person, location, or leadership chain.

There are other opportunities to emphasize the importance of informing individuals under investigation of their statutory rights and allegations made against them and properly documenting that notification in the Department's case management system during established meetings such as Supervisor Quarterly Meetings and Program Manager Quarterly Meetings.

Emphasis will also occur through email notifications that will include guidance informing parents, guardians or custodians of their rights and allegations.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews due to the ongoing emphasis required for current and future DCS Specialists and Program Supervisors.

Recommendation 3: Update Department policies and procedures to specify when a Notice of Duty to Inform is required.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department agrees to update *Chapter 2: Section 3 - Initial Contact and Conducting Interviews* policy to clearly specify when a Notice of Duty to Inform is required or not required.

Finding 2: Department did not always complete and/or properly document some key investigative activities in noncriminal child abuse and neglect reports, which could impact children's welfare and impede subsequent investigations.

<u>Department response:</u> The Auditor General's finding is agreed to.

Response explanation: The Department is dedicated to safeguarding children's welfare by completing and documenting essential investigative activities. This commitment is evidenced by achieving initial response time frames for making initial contact or attempted contact with alleged child victims in 97% of noncriminal reports for the fiscal year 2024. The Department will continue the documentation and completion of key investigative activities while making improvements where necessary.

Recommendation 4: Conduct and document noncriminal report investigations as required by Department policy, including requirements for initial contact with alleged child victims, interviews, Present Danger Plans, Family Functioning Assessments, Infant Care Plans, and notices informing individuals of investigation outcomes.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department will maintain its high rate of initial contact and will continue to complete and document key investigative activities including interviews, Present Danger Plans, Family Functioning Assessments, Infant Care Plans, and notices informing individuals of investigation outcomes.

DCS Program Supervisors will continue to utilize the *DCS-2096 Administrative Review Tool – Assessment* which includes verifying the completion of key investigative activities.

Additionally, the Practice Improvement Unit will continue to review a random sample of assessment (investigation) cases from each unit across the state to measure the rate of outcome achievement that includes key investigative activities.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews as conducting and documenting key investigative activities is a continuous requirement for all current and future investigations.

Recommendation 5: Emphasize to investigators and investigative supervisors through a multipronged approach, for example through Department communications, guidance, or training, the importance of completing and documenting the completion of key investigative steps in the Department's case-management system, as required by Department policy.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department agrees to emphasize the importance of the completion and documentation of key investigative steps in the case-management system. However, the Department will not develop or require additional training.

The Department will continue to require newly hired DCS Specialists and DCS Program Supervisors to successfully complete all the requirements of DCS Specialist Core Training and Supervisor Core Training. DCS Specialist Training includes training competencies in completing and documenting key investigative steps. Supervisor Core Training includes information in the Clinical Supervision and Supervising SAFE AZ modules for ensuring DCS Specialists complete and document key investigative steps.

The Department will continue its Supervision Coach Program, a continuous learning and improvement journey, for newly hired DCS Program Supervisors, which aids in the transfer of learning from classroom training to field practice by following a parallel process. This program allows for observation and feedback during clinical supervision on investigative responsibilities including the confirmation of completion and documentation of key investigative steps. This process ensures supervision, assessment and determination will be the same regardless of person, location, or leadership chain.

There are other opportunities to emphasize the importance of the completion and documentation of key investigative steps in the case-management system during established meetings such as Supervisor Quarterly Meetings and Program Manager Quarterly Meetings.

Emphasis will also occur through email notifications and reminders of existing Practice Guides.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews due to the ongoing emphasis required for current and future DCS Specialists and Program Supervisors.

Recommendation 6: Conduct a risk-based review or audit of noncriminal reports from fiscal year 2025 to determine if the missing documentation is a systemic issue within the units that involved investigative turnover for the noncriminal reports we reviewed and take action as necessary based on the findings.

<u>Department response:</u> The audit recommendation will be implemented in a different manner.

Response explanation: The Department will not conduct a risk-based review or audit. Instead, the Department will update the Pending Vacancy (Assessment/Case Reassignment) Standard Work and will continue to follow that process when there is a need to triage and reassign noncriminal reports. Regional leadership will monitor unit vacancies to identify any systemic issue that may include missing documentation within units that experience investigative turnover and will take any necessary action, as necessary.

Finding 3: Department did not timely complete key investigative steps for many noncriminal reports we reviewed, and prolonged noncriminal investigations without active investigative efforts may negatively impact long-term welfare of families and trust in the Department.

<u>Department response:</u> The Auditor General's finding is agreed to.

Response explanation: The Department agrees that the completion of timely investigations is critical and demonstrated its commitment to ensuring the safety of alleged child victims by meeting initial response time frames to make initial contact or attempted contact with alleged child victims for 97% of noncriminal reports in fiscal year 2024. The Department continues to take steps to improve timeliness and accountability in other key investigative areas, as appropriate.

Recommendation 7: Enter investigation findings into its case-management system within 45 days, as required by statute.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department remains committed to entering investigation findings in its case-management system within the 45-day timeframe. However, there are circumstances where adherence to this timeframe may not be met to ensure a comprehensive investigation. Potential delays may arise from ongoing efforts to locate a family, scheduling interviews, or obtaining essential documents such as medical records and police reports. Therefore, the Department will establish a reasonable target for entering investigative findings within 45 days.

Additionally, the Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews as entering findings into the case-management system is a continuous requirement for all current and future investigations.

Recommendation 8: Complete Family Functioning Assessments for investigations within 45 days, as required by policy.

Department response: The audit recommendation will be implemented.

Response explanation: The Department remains dedicated to completing the Family Functioning Assessments for investigations within a 45-day period. However, certain situations may not allow this timeframe to be met to ensure a thorough investigation. Potential delays may occur due to ongoing efforts to locate a family, schedule interviews, or obtain essential documents such as medical records and police reports. Consequently, the Department will establish a reasonable target for completing the Family Functioning Assessments within the specified 45 days.

Additionally, the Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews as the completion of Family Functioning Assessments is a continuous requirement for all current and future investigations.

Recommendation 9: Emphasize to investigators and investigative supervisors using a multipronged approach, for example through Department communications, guidance, or training, the importance of entering investigation findings, completing Family Functioning Assessments, and closing investigations within statutory and/or Department policy time frames.

Department response: The audit recommendation will be implemented.

<u>Response explanation:</u> The Department agrees to emphasize the importance of entering investigation findings, completing Family Functioning Assessments, and closing investigations within statutory and/or Department policy time frames. However, the Department will not develop or require additional training.

The Department will continue to require newly hired DCS Specialists and DCS Program Supervisors to successfully complete all the requirements of DCS Specialist Core Training and Supervisor Core Training. DCS Specialist Training includes training competencies in entering investigative findings, completing the Family Functioning Assessment and closing investigations within timeframes. Supervisor Core Training includes information in the Clinical Supervision and Supervising SAFE AZ modules for ensuring DCS Specialists enter investigative findings, complete the Family Functioning Assessment and close investigations within timeframes.

The Department will continue its Supervision Coach Program, a continuous learning and improvement journey, for newly hired DCS Program Supervisors, which aids in the transfer of learning from classroom training to field practice by following a parallel process. This program allows for observation and feedback during clinical supervision on investigative responsibilities including the confirmation of entering investigative findings, completing the Family Functioning Assessment and closing investigations within timeframes. This process ensures supervision, assessment and determination will be the same regardless of person, location, or leadership chain.

There are other opportunities to emphasize the importance of the completion and documentation of key investigative steps in the case-management system during established meetings such as Supervisor Quarterly Meetings and Program Manager Quarterly Meetings.

Emphasis will also occur through email notifications and reminders of existing Practice Guides.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews due to the ongoing emphasis required for current and future DCS Specialists and Program Supervisors.

Recommendation 10: Establish and implement a process for Department leadership to track and monitor whether Department investigators are entering investigation findings into its case-management system within the 45-day statutory requirement.

Department response: The audit recommendation will be implemented.

Response explanation: The Department agrees to take action to enhance the current process by incorporating tracking and monitoring of the entry of findings within the 45-day requirement. The Department will continue to utilize the 45+ Check Sheet to track investigation progress and will develop Standard Work to establish guidance and consistency of data.

Recommendation 11: Establish and implement a process for Department leadership to track and monitor specific common causes of untimely investigations, including causes within and outside of the Department's control.

<u>Department response:</u> The audit recommendation will be implemented.

Response explanation: The Department plans to introduce a tracking system to identify and examine the causes of delays, including internal and external factors. A Pareto chart

will be utilized for root cause analysis to identify the most significant factors contributing to untimely investigations.

Recommendation 12: Establish and implement a process for Department leadership to periodically assess the common causes of untimely investigations and take actions to address causes identified to ensure investigators improve timeliness, including in making efforts to close investigations within 60 days, as required by Department policy.

Department response: The audit recommendation will be implemented.

Response explanation: The Department plans to introduce a tracking system to identify and examine the causes of untimely investigations. A Pareto chart will be utilized for root cause analysis to identify the most significant factors contributing to untimely investigations. The Department will take actions to address causes identified to ensure investigators improve timeliness, including efforts to close investigations within 60 days, as appropriate.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews due to the ongoing periodic assessment and required actions to address identified causes.

Recommendation 13: Develop and implement written policies, procedures, and/or guidance that outline requirements and processes for supervisors to meet with staff regarding barriers to completing an investigation within time frames required by Department policy and document those barriers and the supervisor's recommendations for how to proceed.

Department response: The audit recommendation will be implemented.

<u>Response explanation:</u> The Department will implement written policies and procedures to discuss and document barriers to timely investigations, along with recommendations on how to proceed.

Recommendation 14: Develop and implement written policies, procedures, and/or guidance that outline requirements and processes for combining multiple noncriminal reports involving a family into 1 Family Functioning Assessment, including guidance for when a new noncriminal report should or should not be combined into a Family Functioning Assessment for a previous still open noncriminal report.

<u>Department response:</u> The audit recommendation will be implemented in a different manner.

Response explanation: The Department will solicit recommendations from both internal and external experts, such as the Project Steering Committee and Action for Child Protection, respectively, to develop a process for combining multiple non-criminal reports into one Family Functioning Assessment. The Department will decide on the appropriate course of action based on the recommendations provided.

Recommendation 15: As part of conducting ongoing monitoring of its staff realignment, ensure realignment addresses workload needs in the units where Department staff reported staffing, caseload, and/or report reassignment as barriers to timeliness and make additional changes to its investigations positions as needed.

<u>Department response:</u> The audit recommendation will be implemented in a different manner.

<u>Response explanation:</u> The Department will assess business needs which may include statewide workload needs during Deputy Director Business Reviews. Appropriate action will be taken for any identified business needs.

The Department recognizes that the status of this recommendation may not ever be considered fully implemented during periodic follow-up reviews due to the ongoing continuous monitoring associated with it.