

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.

Response explanation: 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.

Department response: 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.

Response explanation: 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.

Department response: 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.

Department response: 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.

Department response: 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.

Department response: 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.

Department response: 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.

Department response: 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.

Department response: 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.

Response explanation: 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.

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 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.

Response explanation: 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.

Department response: 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.

Department response: The audit recommendation will be implemented in a different manner.

Response explanation: 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.