

Examining the Delivery of Services to Vulnerable Adults in the Arizona Adult Protective Services System

24-Month Followup of Special Audit Report 23-114

The September 2023 Examining the Delivery of Services to Vulnerable Adults in the Arizona Adult Protective Services System special contract audit found that although several State agencies, including the Arizona Department of Economic Security's (DES) Adult Protective Services Program (APS), other public entities, and nonprofit organizations have roles and responsibilities related to Arizona's adult protective services system, the system lacked a strategic direction and key outcome data for assessing system effectiveness. Because multiple entities have roles and responsibilities for protecting vulnerable adults, our contractor made **9** recommendations to DES that are dependent on actions taken in conjunction with the Vulnerable Adult System Study Committee (Committee). The Committee was established in response to a recommendation our contractor made to establish a working group that included representation from various entities with roles, responsibilities, and/or interests related to the Arizona adult protective service system to work together to develop a strategic direction for Arizona's adult protective services system. Additionally, our contractor made an additional **4** recommendations to DES, **1** of which also applies to the Arizona Department of Health Services (ADHS) and the Arizona Health Care Cost Containment System (AHCCCS).

DES' status in implementing 9 recommendations in conjunction with the Committee

Implementation status	Number of recommendations
 Implemented in a different manner	1 recommendation
 In process	4 recommendations
 Not yet applicable	4 recommendations

DES' status in implementing 4 recommendations

Implementation status	Number of recommendations
 Implemented	3 recommendations
 Partially implemented	1 recommendation

ADHS' status in implementing 1 recommendation

Implementation status	Number of recommendations
 Implemented	1 recommendation

AHCCCS' status in implementing 1 recommendation

Implementation status	Number of recommendations
 Implemented	1 recommendation

Pursuant to Laws 2024, Chapter 100, §10, the Committee terminated on December 31, 2025. As discussed below, before the Committee terminated it made 8 recommendations to the Legislature that addressed several of the areas included in the contractor's recommendations, such as removing barriers to inter-agency collaboration; investing in State data technology infrastructure to streamline reporting and investigation of abuse, neglect, and exploitation; centralizing resources and referral processes by creating a State-wide standard operating procedure for reporting abuse, neglect, and exploitation; and developing an online database

for storing and cross-referencing entries of abuse, neglect, and exploitation. Additionally, DES in conjunction with the Committee still needed to consider several other areas included in these 9 recommendations but could not do so because the Committee terminated. However, in June 2026, the Legislature passed and the Governor signed legislation to reestablish the Committee on September 12, 2026, through December 31, 2028.¹ As a result, we will conduct additional followup work on the 8 recommendations that DES should implement in conjunction with the Committee that are in process or not yet applicable in calendar year 2027.

Recommendations to DES, the Committee, ADHS, and AHCCCS

Chapter 1: Overview of Arizona's Adult Protective Services System

This chapter did not include any recommendations.

Chapter 2: Strategic Direction

- 1. Establish a working group**—DES should work with the Governor, President of the Arizona Senate, and Speaker of the Arizona House of Representatives to establish and appoint members to a working group to develop a strategic direction for Arizona's adult protective services system. Specifically, to ensure working group membership adequately represents various system stakeholders, the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, and DES should consider appointing 5 members each, for a total of 20 members, or appointing an alternate number of members with each appointing an equal number. When appointing working group members, the Governor's Office, President of the Arizona Senate, Speaker of the Arizona House of Representatives, and DES could consider a wide range of stakeholders, such as representatives from AHCCCS, ADHS, and the Attorney General's Office; public fiduciaries; representatives from local law enforcement; vulnerable adult advocates; Tribal representatives; legislative members; and members from the Arizona House of Representatives' Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults.

► Status: **Implemented at 24 months.**

As discussed in our initial followup, Laws 2024, Chapter 100, §10, established the 25-member Vulnerable Adult System Study Committee until December 31, 2025, to develop and implement a coordinated vulnerable adult delivery system and to recommend improvements to Arizona's adult protective services system. On September 26, 2024, the Committee held its first public meeting, and it held 3 subsequent public meetings in February, September, and December 2025. Additionally, as of October 2025, 24 of 25 positions on the Committee were filled and included membership representing various system stakeholders such as the Governor's Office, Arizona

¹ Laws 2026, Ch. 182, Sec. 2.

Senate, Arizona House of Representatives, DES, DHS, AHCCCS, and the Arizona Attorney General's Office, and also included tribal representatives, law enforcement members, healthcare professionals, public fiduciaries, and vulnerable adult advocates.

- 2. Develop report identifying roles/responsibilities and other needs**—DES in conjunction with the working group should develop a report that identifies the working group's roles and responsibilities and identifies any authority, resources, legislation, or other action needed to ensure the working group's ongoing success in identifying and implementing the strategic direction for Arizona's adult protective services system. DES should submit the report to the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, Senate and House Health and Human Services committees, Joint Legislative Budget Committee, and Arizona House of Representatives' Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults by November 1, 2024.

► Status: **Implemented in a different manner at 24 months.**

As explained in chapter 2, recommendation 1, Laws 2024, Ch. 100, §10, established the Committee to develop and implement a coordinated vulnerable adult delivery system and to recommend improvements to Arizona's adult protective services system. This law further required the Committee to submit a report of its findings and recommendations to the Governor, the Arizona State Senate President, and the Speaker of the Arizona House of Representatives on or before October 1, 2025. Consistent with this requirement, the Committee published a report on the Legislature's website on October 1, 2025, that included 7 system-level recommendations related to actions needed to help ensure its ongoing success in identifying and implementing a strategic direction for Arizona's adult protective services system. Six of the recommendations were to the Legislature and included actions related to improving interagency communication; establishing an online database to allow relevant State agencies, law enforcement, regulatory agencies, and licensing boards to access, cross-reference, and follow up on reports of abuse, neglect, and exploitation; increasing public awareness; establishing stakeholder groups; and extending the Committee's termination date beyond December 31, 2025 (see page 2 for information on the reestablishment of the Committee until December 31, 2028). Additionally, the Committee recommended holding another public meeting to receive public testimony related to the electronic monitoring of assisted living facilities. On December 10, 2025, the Committee held a final public meeting to discuss electronic monitoring of assisted living facilities and issued an addendum to its published report.²

- 3. Develop a strategic direction**—Once the roles and responsibilities and any needed authority, resources, legislation, or other action has been provided and/or approved, DES in conjunction with the working group should develop a strategic direction for Arizona's adult protective services system that will help ensure the safety of vulnerable adults and establishes protocols for services during and after an investigation. This should include:

² In the addendum to its published report, the Committee recommended that the Legislature adopt legislation permitting residents in long-term care facilities or their authorized representatives to install and maintain an electronic monitoring device in private spaces while DES, AHCCCS, ADHS, and the Legislature analyze a report examining real-world data from long-term care facilities that already permit electronic monitoring in private spaces to assess their impact on complaints, resident rights and autonomy, injuries and falls, APS involvement, and staffing.

- Evaluating how Arizona’s adult protective services system can target systems beyond just the individual victim to help alleviate mistreatment risk;
- Determining whether a specific state agency should be assigned the responsibility of case management services to help ensure that vulnerable adults receive the services they have been referred to after a DES APS investigation;
- Establishing processes, in conjunction with recommendations in chapter 3, for measuring and reporting on vulnerable adult level outcomes, including key outcomes that will help demonstrate whether Arizona’s processes are reducing maltreatment, vulnerable adult-centered, and provide services both during and after an investigation;
- Considering practices from other states, including those outlined in this report;
- Addressing gaps outlined in this report; and
- Reviewing and considering whether to continue and or build upon efforts outlined in other plans, such as Report of the Abuse & Neglect Prevention Task Force (2019), Implementation and Impact of Arizona’s Abuse & Neglect Prevention Task Force Recommendations (May 2022), Arizona State Plan on Aging 2023-2026 (2023), Adult Protective Services Action Plan (March 2020), DES APS Year in Review Reports (SFYs 2020, 2021 and 2022), and DES Annual Report (SFY 2022).

► Status: **Implementation in process.**

As discussed in chapter 2, recommendation 2, in October 2025, the Committee, which includes DES representation, published a report with 7 system-level recommendations related to actions needed to help ensure its ongoing success in identifying and implementing a strategic direction for Arizona’s adult protective services system. The report included a recommendation to establish an online database for which entries for abuse, neglect, and exploitation are stored, cross-referenced and connected to be followed up on by any relevant State agencies. The Committee’s recommendation addresses some barriers identified in the September 2023 report regarding having a united approach to protecting vulnerable adults in the State.

When the Committee terminated in December 2025, DES and the Committee still needed to consider several other areas the contractor recommended for inclusion in the strategic direction for Arizona’s adult protective services system.

These areas included:

- Determining whether a specific State agency should be assigned the responsibility of case management services to help ensure that vulnerable adults receive the services they have been referred to after a DES APS investigation.
- Establishing processes for measuring and reporting on vulnerable adult level outcomes, including key outcomes that will help demonstrate whether Arizona’s processes are reducing maltreatment and provide services both during and after an investigation.

Effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

- 4. Develop action plan for implementing strategic direction**—Once the strategic direction is established, DES in conjunction with the working group should complete the following tasks: Develop an action plan for implementing Arizona's strategic direction, including identifying DES and other state agency responsibilities, policies, protocols, practices, and/or statutory changes that are needed, and critical resources and commitments that must be in place for ensuring Arizona's strategic direction can be met. The action plan should include specific tasks with estimated completion dates along with assigned responsibilities and a process to regularly review progress and modify the plan as needed.

► Status: **Not yet applicable.**

As explained in chapter 2, recommendation 3, DES and the Committee were still in the process of developing a strategic direction for Arizona's adult protective services system when the Committee terminated in December 2025. Therefore, this recommendation is not yet applicable. Effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

Chapter 3: Accountability Mechanisms

- 1. Identify accountability mechanisms**—DES in conjunction with the working group identified in chapter 2, recommendation 1, should identify accountability mechanisms that could be implemented for Arizona's adult protective services system, such as independent oversight and quality assurance processes.

► Status: **Implementation in process**

Although the Committee has yet to fully develop and implement a strategic direction for Arizona's adult protective services system, the Committee has taken some steps to help identify accountability mechanisms necessary for assessing the system's effectiveness. For example, the Committee's October 2025 report discussed in chapter 2, recommendation 2, recommended that the Legislature remove barriers to inter-agency collaboration and work with stakeholders and relevant State agencies to develop an online database for reports of abuse, neglect, and exploitation to be stored, cross-referenced, and followed up on by any relevant State agencies. These recommendations could assist the Committee in developing accountability mechanisms by expanding interagency collaboration and communication.

When the Committee terminated in December 2025, DES and the Committee still needed to consider and develop recommendations for specific accountability mechanisms that could be implemented by Arizona's adult protective services system, such as independent oversight or quality assurance processes, as recommended by

the contractor. Effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027

- 2. Identify and develop common, system-wide outcomes**—DES in conjunction with the working group identified in chapter 2, recommendation 1, should identify and develop a set of common, system-wide outcomes that can be used to assess the effectiveness of Arizona's strategic direction, including identifying which entities will collect outcome data and how they will do so, and developing a quality assurance process for ensuring the outcome data is complete and accurate. The outcomes should include (1) reduced elder and vulnerable adult mistreatment; (2) reduced recurrence of victimization and or self-neglect; (3) service plans that are vulnerable adult-centered; and (4) vulnerable adult engagement with services during and after an investigation that alleviate mistreatment.

► Status: **Not yet applicable.**

As discussed in chapter 2, recommendation 3, when the Committee terminated in December 2025, DES and the Committee still needed to consider several areas the contractor recommended for inclusion in the strategic direction for Arizona's adult protective services system, including establishing processes for measuring and reporting on vulnerable adult level outcomes. As a result, the recommendation to develop a set of common, system-wide outcomes that can be used to assess the effectiveness of Arizona's strategic direction is not yet applicable. Although the Committee terminated on December 31, 2025, effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

- 3. Identify system-wide performance reporting process and develop report identifying roles/responsibilities and other needs**—DES in conjunction with the working group identified in chapter 2, recommendation 1, should identify a system-wide performance reporting process that could compile performance and outcome information on an annual basis to assess the effectiveness of Arizona's strategic direction. In designing the performance reporting process, the working group should resolve the data issues identified in this report, including, limitations of a lack of data on service provision; lack of unique identifiers, absence of outcome reporting between agencies, concerns with confidentiality; and lack of case management processes that may be a barrier to sharing vulnerable adult level information and reporting on aggregate outcomes for vulnerable adults. DES in conjunction with the working group should develop a report that identifies the authority, roles and responsibilities, and resources needed to design and implement the system-wide reporting process. DES should submit the report to the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, Senate and House Health and Human Services committees, Joint Legislative Budget Committee, and Arizona House of Representatives' Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults.

► Status: **Implementation in process**

The Committee's October 2025 report discussed in chapter 2, recommendation 2 includes recommendations to the Legislature that, if implemented, could assist with the development of a system-wide performance reporting process. For example, the Committee's report recommends that the Legislature remove barriers to inter-agency collaboration; invest in State data technology infrastructure to streamline reporting and investigation of abuse, neglect, and exploitation; centralize resources and referral processes by creating a State-wide standard operating procedure for reporting abuse, neglect, and exploitation; and develop an online database for storing and cross-referencing entries of abuse, neglect, and exploitation.

When the Committee terminated in December 2025, DES and the Committee still needed to consider information to address other areas of this recommendation, such as lack of data on service provisions, a lack of unique identifiers, concerns with confidentiality, and a lack of a case management process. Although the Committee terminated on December 31, 2025, effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

4. **Implement system-wide performance reporting process**—Once the roles and responsibilities and any needed authority, resources, legislation, or other action has been provided and/or approved, DES in conjunction with the working group should take the necessary steps to implement a system wide performance reporting process that compiles performance and outcome information on an annual basis to assess the effectiveness of Arizona's strategic direction.

► Status: **Not yet applicable.**

As explained in chapter 3, recommendation 3, when the Committee terminated in December 2025, DES and the Committee were still in the process of identifying a system-wide performance reporting process. Therefore, this recommendation is not yet applicable. Although the Committee terminated on December 31, 2025, effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

Chapter 4: Community Engagement Recommendations

1. **Incorporate community engagement into strategic direction**—DES in conjunction with the working group identified in chapter 2, recommendation 1, should incorporate community engagement into the strategic direction for Arizona's adult protective services system identified in chapter 2, recommendation 3.

► Status: **Not yet applicable.**

As explained in chapter 2, recommendation 3, as of December 2025, when the Committee terminated, it was still in the process of developing a strategic direction for Arizona's adult protective services system. As a result, this recommendation is not yet applicable. Effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

- 2. Continue community engagement efforts**—DES APS should continue community engagement efforts and ensure educational materials at a minimum include the information recommended by the Administration for Community Living (ACL) 2020 Voluntary Consensus Guidelines for State APS Systems.

▶ Status: **Implemented at 24 months.**

As discussed in the initial followup, DES APS conducted 51 presentations for more than 1,160 participants that included information recommended by the ACL 2020 Voluntary Consensus Guidelines for State APS Systems. Since that time, DES APS has continued its community engagement efforts. Specifically, according to DES APS outreach logs, between January 2025 and October 2025, DES APS conducted 46 educational presentations to more than 1,400 participants, such as community members, family caregivers, and mandatory reporters such as nurses, social workers, and first responders. Consistent with the federal ACL 2020 Voluntary Consensus Guidelines for State APS Systems, DES' educational materials provided the public with the definition of vulnerable adult maltreatment and guidance on when and how to report vulnerable adult maltreatment, and described DES APS' authority and limitations related to investigating vulnerable adult maltreatment.

- 3. Continue satisfaction survey**—DES APS should continue its vulnerable adult satisfaction survey; expand it to include other case participants; offer a Spanish language option; continue to use feedback from the survey to improve its processes for vulnerable adults; and consider incorporating survey responses into performance reports.

▶ Status: **Partially implemented at 24 months.**

DES APS' quality assurance unit has continued performing monthly satisfaction surveys of vulnerable adults in both English and Spanish. Each month the survey results are shared with DES leadership, and DES staff review investigations for which survey respondents shared negative experiences to identify areas for improvement. For example, after reviewing 1 investigation for which a survey respondent shared a negative experience, DES staff recommend that additional coaching should be provided to both the investigator and supervisor who worked on the investigation. In addition, when a survey respondent shares a positive interaction with an investigation, DES sends that feedback to the investigator. However, similar to what we reported in the previous followup, DES reported that given limited budget resources, it does not plan to expand the survey to other case participants. Therefore, we determined that DES APS has partially implemented this recommendation.

- 4. Continue to partner with key agencies**—DES APS, AHCCCS, and ADHS should continue to find ways to partner in community engagement activities, such as Speak Up AZ!, to educate the public on recognizing and reporting signs of abuse, neglect, and exploitation of adults.

► Status: **Implemented at 24 months.**

Since our initial followup issued in September 2024, DES has continued to partner with AHCCCS and ADHS in community engagement activities to educate the public on recognizing and reporting signs of abuse, neglect, and exploitation of adults. Specifically, DES completed the Speak Up AZ! campaign in calendar year 2024, which utilized a variety of advertising mediums to educate the public and mandated reporters about recognizing and reporting signs of abuse, neglect, and exploitation of adults. Additionally, DES organized and hosted the 2025 World Elder Abuse Awareness Day conference in June 2025 that included partners such as the International Association for Indigenous Aging, Area Agencies on Aging, and the Arizona Commission from the Deaf and the Hard of Hearing. Further, DES presented at the 2025 National Adult Protective Services Association conference on topics such as conducting advanced investigations. DES has also partnered with ADHS and AHCCCS on ADHS's Dementia Services Program and Alzheimer's Disease State Plan, which has a mission to increase community education, resources, and overall engagement for dementia-related subjects.

- 5. Obtain input from vulnerable adults**—DES in conjunction with the working group identified in chapter 2, recommendation 1, should involve vulnerable adults and their families in the development of the strategic direction for Arizona's adult protective services system.

► Status: **Implementation in process.**

In September 2025, the Committee, which includes DES representation, held a public meeting to allow for public testimony related to the strategic direction for Arizona's adult protective services system; however, the Committee did not receive any input from the public during its September 2025 meeting. Additionally, as discussed in chapter 2, recommendation 3, the Committee was still in the process of developing a strategic direction for Arizona's adult protective services system when it terminated on December 31, 2025. Effective September 12, 2026, Laws 2026, Ch. 182, reestablishes the Committee until December 31, 2028. Therefore, we will conduct additional followup work to assess DES' and the Committee's efforts to implement this recommendation in calendar year 2027.

Chapter 5: Areas for Future Review

This chapter did not include any recommendations.