

Arizona Department of Child Safety

Investigations of Noncriminal Child Abuse and Neglect Reports

Initial Followup of Special Audit Report 25-109

The September 2025 Arizona Department of Child Safety (Department) special audit found that the Department did not always inform individuals under noncriminal investigation in writing of their rights and/or specific allegations against them or timely complete and/or properly document some key investigative activities, which could negatively impact children and families. We made **15** recommendations to the Department.

Department's status in implementing 15 recommendations

Implementation status	Number of recommendations
 In process	11 recommendations
 In process in a different manner	1 recommendation
 Not implemented	3 recommendations

We will conduct a 24-month followup with the Department on the status of the recommendations that have not yet been implemented.

Recommendations to the Department

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

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.

► Status: **Implementation in process.**

Our review of Department case-management system documentation for a stratified random sample of 15 noncriminal child abuse and neglect reports that required a Notice of Duty to Inform that the Department received between December 1, 2025 and March 17, 2026, found that Department investigators provided a Notice of Duty to Inform verbally and in writing as well as uploaded the Notice of Duty to Inform to the Department case-management system for 14 of 15 noncriminal reports. For the 1 remaining report, a Notice of Duty to Inform was provided to only 2 of 3 alleged perpetrators.¹ Additionally, Department investigators only provided the individual(s) under investigation with the specific allegation(s) made against them in writing, consistent with statute and Department policy, for 11 of 15 noncriminal reports we reviewed. In the 4 reports where the specific allegations were not provided, the Department did not include all of the allegations or only provided vague allegation information, such as "abuse" or "neglect." We will further assess the Department's implementation of this recommendation during our next followup.

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.

► Status: **Implementation in process.**

The Department has taken steps to emphasize to investigative supervisors the importance of informing individuals under investigation of their statutory rights

¹ We reviewed a stratified random sample of 16 of 11,193 noncriminal reports the Department received between December 1, 2025 and March 17, 2026. Specifically, our random sample consisted of 4 of 15 noncriminal reports involving group home staff as the alleged perpetrator and 12 of 11,178 noncriminal reports with a parent or guardian as the alleged perpetrator. For 1 of 16 noncriminal reports we reviewed, Department investigators were unable to locate or contact the alleged perpetrator despite multiple attempts to do so, and therefore, A Notice of Duty to Inform was not applicable in this report as they were unable provide a Notice of Duty to Inform to the individual under investigation. As such, only 15 of 16 noncriminal reports we reviewed should have included a Notice of Duty to Inform.

verbally and in writing. For example, the Department held quarterly meetings in January and April 2026 with investigative supervisors and discussed the importance of documenting the Notice(s) of Duty to Inform in its case-management system, and using the Department's pre-existing supervisory review checklist that includes various requirements to confirm whether a Notice of Duty to Inform was provided to each parent, guardian, and/or custodian.²

However, the Department did not provide documentation that it had emphasized the importance of informing the individuals under investigation of the specific allegations made against them. According to the Department, it plans to develop comprehensive written guidance regarding its expectations around the Notice of Duty to Inform by December 2026. We will further assess the Department's implementation of this recommendation during our next followup.

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

▶ Status: **Implementation in process.**

As of April 2026, the Department had initiated a process to update its policies and procedures to specify when a Notice of Duty to Inform is required, including meeting with staff from the Protective Services Section within the Arizona Attorney General's Office to gather stakeholder input on its policy update in May 2026. According to the Department, this process will ensure that updates to its policies and procedures are accurate and consistent with statutory and Department policy requirements. The Department reported it intends to update its policies and procedures by December 2026. However, as of May 2026, the Department reported that no draft policies and procedures were available. We will further assess the Department's implementation of this recommendation during our next followup.

² According to the Department, its expectations are that supervisors should disseminate updates from the quarterly meetings to the investigators within their unit and address and/or escalate any questions, concerns, or insights.

Finding 2: 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

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.

► Status: **Implementation in process.**

Our review of 16 noncriminal child abuse and neglect reports the Department received between December 1, 2025 and March 17, 2026, found that Department investigators conducted and documented most but not all key investigatory steps for noncriminal report investigations as required by Department policy.³

For example, Department investigators:

- Documented that it made initial contact or attempted to make initial contact with the alleged child victim(s) in all 16 noncriminal reports we reviewed within required time frames.
- Documented interviews with all alleged child victims and with the alleged perpetrator(s) and other adults in all but 1 noncriminal report we reviewed.
- Documented an Infant Care Plan for the 1 noncriminal report that required an Infant Care Plan, as well as a Present Danger Plan for the 1 noncriminal report in which the investigator determined the child victim was in present danger.
- Provided notices informing individuals of investigation outcomes for 15 of 16 noncriminal reports.
- Documented a Family Functioning Assessment for all 12 noncriminal reports in which Family Functioning Assessment was required. However, the Department did not include all required information in the Family Functioning Assessment for 6 of 12 reports we reviewed.⁴ For example, the Family Functioning Assessments were missing information about circumstances surrounding maltreatment and/or information about caregiver protective capacities.

We will further assess the Department's implementation of this recommendation during our next followup.

³ We reviewed a stratified random sample 16 of 11,193 noncriminal reports the Department received between December 1, 2025 and March 17, 2026. Specifically, our random sample consisted of 4 of 15 noncriminal reports involving group home staff as the alleged perpetrator and 12 of 11,178 noncriminal reports with a parent or guardian as the alleged perpetrator.

⁴ According to Department policy, a Family Functioning Assessment is not completed for investigations involving group home staff as the alleged perpetrator. Four of 16 noncriminal reports we reviewed involved group home staff as the alleged perpetrator, and as such, a Family Functioning Assessment was not required.

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.

► Status: **Implementation in process.**

The Department has taken steps to emphasize to investigative supervisors the importance of completing and documenting the completion of key investigative steps through its quarterly meetings with supervisors. For example, according to Department documentation, during a quarterly meeting with supervisors held in April 2026, the Department discussed the importance of investigative step documentation and of using its pre-existing supervisory review checklist to help ensure all key investigative steps are documented in its case-management system.⁵

The Department reported that the supervisory review checklist helps ensure that essential investigative steps are consistently documented in its case-management system. However, our review found that the supervisory review checklist includes some but not all key investigative steps we reviewed. For example, the supervisory review checklist does not include a step to check if investigators have conducted interviews with the alleged child victim(s), other children in the home, the alleged perpetrator(s), or parent(s), as required by Department policy. We will further assess the Department's implementation of this recommendation during our next followup.

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.

► Status: **Implementation in process in a different manner.**

The Department indicated in its audit response that it would implement this recommendation in a different manner and would not conduct a risk-based review or audit but would update its standard work related to vacancies and case reassignment, as well as monitor unit vacancies to identify any systemic issue within units that experience investigative turnover and would take any necessary action. The Department reported that regional leadership is taking steps to identify if missing documentation is a systemic issue within those units and take action as necessary. For example, according to Department documentation, regional leadership monitored unit vacancies and provided support to 2 units that experienced turnover in March 2026 to help obtain missing documentation.

According to the Department, as of April 2026, it was reviewing its existing policies, procedures, and guidance and planned to finalize updates to its standard work related to ensuring missing documentation is entered into its case-management system when

⁵ According to the Department, its expectation is that supervisors will emphasize to the investigators they supervise the importance of completing and documenting key investigative steps through their meetings with investigators.

there is investigative turnover, vacancies, and case reassignment by December 2026. We will assess the Department's updated process for ensuring missing documentation is completed as necessary for noncriminal reports when there is investigative turnover during our next followup.

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

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

▶ Status: **Implementation in process.**

Although the Department has made some progress as of August 2026 in implementing our recommendations intended to address the potential causes of its untimely entering of investigation findings into its case-management system, our review found the Department did not enter all investigation findings into its case-management system within 45 days as required by statute (see Recommendations 9 through 15 for more information about the Department's progress related to addressing the potential causes of untimeliness).

Specifically, our review of 16 noncriminal reports the Department received between December 1, 2025 and March 17, 2026, found that the Department had not entered investigation findings into its case-management system within 45 days for 8 of 16 reports.⁶ For these 8 untimely reports, investigators took between 47 and 131 days, with an average of 68 days, to enter investigation findings into the Department's case-management system. We will further assess the Department's implementation of this recommendation during our next followup.

- 8.** Complete Family Functioning Assessments for investigations within 45 days, as required by Department policy.

▶ Status: **Implementation in process.**

Our review of 12 noncriminal reports the Department received between December 1, 2025 and March 17, 2026, that required a Family Functioning Assessment found that the Department had not completed a Family Functioning Assessment within 45 days, as required by Department policy, for 6 of 12 noncriminal reports.⁷ Additionally, although the Department developed a checklist for Department supervisors to track untimely

⁶ We reviewed a stratified random sample of 16 of 11,193 noncriminal child abuse and neglect reports that the Department received between December 1, 2025 and March 17, 2026. Specifically, our random sample consisted of 4 of 15 noncriminal reports involving group home staff as the alleged perpetrator and 12 of 11,1178 noncriminal reports with a parent or guardian as the alleged perpetrator.

⁷ We reviewed a stratified random sample 16 of 11,193 noncriminal reports the Department received between December 1, 2025 and March 17, 2026. Specifically, our random sample consisted of 4 of 15 noncriminal reports involving group home staff as the alleged perpetrator and 12 of 11,1178 noncriminal reports with a parent or guardian as the alleged perpetrator. According to Department policy, a Family Functioning Assessment is not required for investigations involving group home staff as the alleged perpetrator; therefore, 4 of 16 noncriminal reports we reviewed did not require a Family Functioning Assessment, and we reviewed only the 12 of 16 noncriminal reports that required a Family Functioning Assessment.

investigations and identify barriers to investigation closure, the checklist does not track the completion of Family Functioning Assessments (see Recommendation 11 for more information about the Department's checklist). We will further assess the Department's changes to its communications, tracking and monitoring, or written policies, procedures, and/or guidance to help supervisors and investigators timely complete a Family Functioning Assessment during our next followup.

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.

► Status: **Implementation in process.**

The Department has taken steps to emphasize to investigative supervisors the importance of entering investigation findings and closing investigations within statutory and/or Department policy time frames through its quarterly meetings with supervisors. Specifically, according to Department documentation, during a quarterly meeting with supervisors held in April 2026, the Department discussed the importance of timely entering investigation findings, such as entering investigation findings once all necessary evidence is gathered, rather than waiting for the investigation to be closed.⁸

Additionally, the Department reported that timely engagement with children and families, which can directly impact Family Functioning Assessment completion timeliness by helping to ensure timely collection of assessment information, is a topic discussed at all of its weekly huddles and accountability calls. The Department also reported that it has seen improvement in timely assessment closures during calendar year 2026. Finally, the Department reported it would consider the importance of completing Family Functioning Assessments within Department policy time frames as a topic for a future quarterly meeting. We will further assess the Department's implementation of this recommendation during our next followup.

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.

► Status: **Not implemented.**

The Department reported that as of August 2026, it has not established 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 but expects to do so by August 2027. According to the Department, it has not established this process because it first had to update its case-management system to comply with a statutory change to establish a tiered system for placing persons found to have committed an act of child abuse or neglect on the

⁸ According to the Department, its expectation is that supervisors will emphasize to the investigators they supervise the importance of completing and documenting key investigative steps through their meetings with investigators.

central registry. As of August 2026, the Department reported it is still finalizing the changes to the central registry. The Child Welfare League of America (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 is intended to optimize the balance between quick child safety decisions and procedural fairness for families. We will further assess the Department's implementation of this recommendation during our next followup.

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.

► Status: **Implementation in process.**

In March 2026, the Department developed a checklist for Department supervisors to track untimely investigations and identify barriers to investigation closure. Specifically, the checklist outlines steps for supervisors to track the dates that Department investigators completed specific investigatory steps. According to the checklist, Department supervisors should review investigations open for more than 45 days with Department investigators and discuss and address barriers to timely investigation closure twice a week. Additionally, the checklist includes a field to document barriers to investigation closure and indicate if the barrier has been identified as outside the Department's control, such as when there is an active law enforcement investigation or if medical or police records have been requested but not received.

However, although the Department reported that leadership will use its checklist to track and monitor specific common causes of untimely investigations, including causes within and outside of the Department's control, and to take action to address causes identified, it did not provide any policies, procedures, guidance, or plans outlining a process for Department leadership to do so. According to the Department, its checklist will be incorporated into its operations State-wide by December 2026. We will further assess the Department's implementation of this recommendation during our next followup.

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.

► Status: **Not implemented.**

As discussed in recommendation 11, the Department has developed a checklist for Department supervisors to track untimely investigations and identify barriers to investigation closure. However, it has not developed any policies, procedures, or guidance outlining a process for Department leadership to use information gathered with the checklists to assess and take actions to address common causes of untimely investigations. We will further assess the Department's implementation of this recommendation during our next followup.

- 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 the time frames required by Department policy, and document those barriers and the supervisor's recommendation for how to proceed.

► Status: **Implementation in process.**

As discussed in Recommendation 11, in March 2026, the Department developed a checklist for supervisors to document barriers to investigation closure, which requires supervisors to meet with Department investigators twice a week to discuss and address barriers to timely close investigations. Further, the Department's procedures require supervisors to document these barriers to timely investigation closure and develop solutions to address those barriers on a tracking sheet during meetings held with their investigative unit. Our review of an investigative unit's tracking sheet found the unit identified missing present danger assessments as a barrier and determined that investigators in the unit should create and email plans to their supervisors for contacting the remaining uncontacted alleged child victims. Finally, as previously discussed, the Department reported its checklist will be incorporated into its operations State-wide by December 2026. We will further assess the Department's implementation of this recommendation during our next followup.

- 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.

► Status: **Not implemented.**

The Department met with external child welfare experts in July 2026 to discuss Family Functioning Assessments when additional reports are received on a family during an assessment. Although our review of Department documentation found the external child welfare expert indicated a new noncriminal report should be combined into a Family Functioning Assessment for a previous still open noncriminal report, the Department did not document any discussions regarding whether the timeliness of open noncriminal reports should impact the Department's decision to combine new noncriminal reports involving a family into 1 Family Functioning Assessment. As a result of its discussion with external child welfare experts, the Department reported that it will take no further action on this recommendation. However, without written policies, procedures, and/or guidance, the Department risks that noncriminal reports with untimely completion of the Family Functioning Assessment could further delay the investigation and prolong family stress and delays in services for children. Because the Department reported it will not take any further action on this recommendation, this concludes our followup work on this 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.

► Status: **Implementation in process.**

As of April 2026, as part of its ongoing monitoring of staff realignment, the Department transitioned noninvestigator positions in 2 units to investigator positions and created a new investigative unit that, according to the Department, is intended to address increased report volume. Specifically, the Department transitioned 2 positions in Pinal County and 10 positions in Maricopa County from noninvestigatory roles, including staff who handle in-home and ongoing cases, to investigatory roles and created an additional investigative unit in Maricopa County with 1 supervisor and 6 investigator positions. According to the Department, as of May 2026, it had either made an offer to applicants or filled 4 of 6 investigator positions and 1 supervisor position in the new investigative unit. We will further assess the Department's implementation of this recommendation during our next followup.