

September 1, 2026

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 Reports Involving Child Welfare Agency Staff*

Dear Ms. Perry:

The Arizona Department of Child Safety (Department) acknowledges the audit of its processes for investigating child abuse reports involving group home staff and has reviewed the report.

The Department appreciates the audit's conclusion that no systemic child safety or investigative process failures were identified.

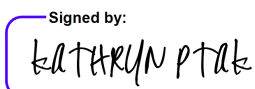
The report affirms the Department's ongoing focus on timely, consistent, and accountable practice. It further recognizes the Department's willingness to clarify policies, procedures and contract expectations and to strengthen investigative processes, reflecting the Department's commitment to continuous improvement.

The Department values the Auditor General's review and remains committed to implementing improvements while building upon the strengths identified in the audit

Attached is the Department's formal response to the findings and recommendations, outlining steps to enhance policies, documentation practices and processes that support child safety and investigative integrity.

Sincerely,

Signed by:


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Kathryn Ptak
Director

Enclosure: DCS Recommendation Response

Chapter 1: Although our review did not identify systemic child safety or investigative process failures, Department's reported process for determining if it should remove group home staff under investigation for alleged abuse from having access to children does not fully address potential safety threats to children in group homes and risks to the investigative process.

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

Response explanation: The Department appreciates that the audit identified no systemic child safety or investigative process failures. The Department is committed to strengthening its process for determining if it should remove group home staff under investigation for alleged abuse.

Recommendation 1: Develop and implement written policies, procedures, and/or guidance outlining when and how Department staff should follow up with group homes to help ensure that they have removed alleged perpetrator's access to children when the Department has notified them to do so, including when group homes do not respond to Department notifications. The policies, procedures, and/or guidance for conducting follow ups should outline the staff responsible for conducting follow ups, methods of contact, timelines, and steps to take if a group home fails to confirm alleged perpetrators no longer have access to children.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will establish clear policies, procedures and/or guidance for staff to identify when to follow up with group homes after notification to remove alleged perpetrators' access to children. The policies, procedures and/or guidance will include defining responsible parties, methods of contact, timelines and escalation steps for non-responsive group homes.

Recommendation 2: Develop and/or update and implement written policies, procedures, and/or guidance for making and documenting decisions to remove alleged perpetrators' access to children when they are a group home staff member under investigation for child abuse that address potential safety threats to children and risks of hindering the investigation process, including outlining required time frames, criteria, and detailed steps for assessing and determining if a group home staff member under investigation poses a safety threat to the alleged child victim and other children in group homes; requirements for documenting the assessment and determination that a group home staff member poses a safety threat to the alleged child victim and/or other children in group homes, including the information used to make the determination; and time frames and requirements for requiring the group home to remove the staff member's access to children if they are determined to pose a safety threat to the alleged child victim and/or other children in group homes.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will develop and update written policies and procedures that clearly define how staff assess and document decisions to remove a group home staff member's access to children during an abuse investigation. These updates will outline required time frames, criteria for determining safety threats and the

specific steps staff must follow when evaluating and documenting whether a staff member poses a risk to an alleged victim or other children.

The Department will also establish clear requirements for documenting the assessment and determination, including the information relied upon and set time frames for directing group homes to remove staff access when a safety threat is identified.

Recommendation 3: Inform child welfare agencies of the Department's expectations regarding group home staff's access to children while under investigation, such as by updating its contract language with child welfare agencies to direct them to its updated policies, procedures, or written guidance regarding group home staff's access to children.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will inform child welfare agencies of expectations regarding group home staff's access to children during investigations, including updating contract language to reference the revised policies and procedures rather than citing the specific expectations outlined in policies and procedures.

Chapter 2: Department lacks explicit statutory authority to place group home staff on the central registry for child neglect and instead reviews neglect allegations as potential licensing violations, risking that child neglect perpetrators can continue working with children unless otherwise prohibited by a criminal arrest, trial, or conviction.

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

Response explanation: The Department acknowledges limitations in placing group home staff on the Central Registry for child neglect and continues to review neglect allegations as potential licensing violations. However, criminal investigations may still occur under Arizona Revised Statutes Title 13.

Recommendation 4: Determine if statutory changes are needed to clarify the Department's authority related to investigating/substantiating reports of allegations of neglect perpetrated by group home staff.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will review statutes and policies from other states related to group home staff investigations, review data as to volume of potential allegations and determine if any or all categories of neglect could apply to group home shift staff in order to enhance child safety.

The Department will then determine whether statutory changes would clarify the Department's authority related to investigating and substantiating reports of alleged neglect perpetrated by group home staff.

Recommendation 5: If it determines statutory changes are needed, work with the Legislature to seek statutory changes related to investigating/substantiating reports of allegations of neglect perpetrated by group home staff.

Department response: The audit recommendation will be implemented.

Response explanation: If it is determined that statutory changes are necessary to clarify the Department's authority to investigate and substantiate allegations of neglect perpetrated by group home staff, the Department will work with the Legislature to pursue those statutory changes and ensure the authority needed to properly address neglect concerns in group home settings.

Recommendation 6: If statutory changes are made, revise and implement the Department's policies and procedures to align with the Department's authority related to allegations of neglect perpetrated by group home staff.

Department response: The audit recommendation will be implemented.

Response explanation: If statutory changes are enacted, the Department will revise and implement its policies and procedures to align with updated authority regarding neglect allegations by group home staff.

Recommendation 7: Ensure Department staff are aware of Department processes for handling allegations of neglect perpetrated by group home staff, including any changes to its processes and updating its training.

Department response: The audit recommendation will be implemented.

Response explanation: If statutory changes are made, the Department will ensure staff are informed of processes for handling neglect allegations by group home staff, including updates to training and communication of any process changes. Education and guidance will be provided to staff to maintain awareness and compliance.