

Special Audit

Arizona Department of Child Safety Investigations of Reports of Criminal Conduct

Seven county attorney's offices had not updated criminal child abuse and neglect joint investigation protocols for more than 5 years, risking unresponsiveness to legal and other changes, and Department has opportunities to strengthen coordination with law enforcement agencies



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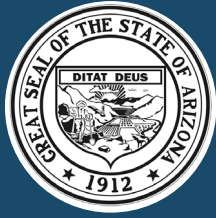
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ARIZONA AUDITOR GENERAL

Lindsey A. Perry, Auditor General

September 23, 2026

Members of the Arizona State 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 the Arizona Department of Child Safety—Investigations of Reports of Criminal Conduct*. 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

Lindsey A. Perry, CPA, CFE
Auditor General

Arizona Department of Child Safety

Special Audit—Investigations of Reports of Criminal Conduct

Seven county attorney's offices had not updated criminal child abuse and neglect joint investigation protocols for more than 5 years, risking unresponsiveness to legal and other changes, and Department has opportunities to strengthen coordination with law enforcement agencies

Audit purpose

To review the Department's processes for initiating and conducting investigations of child abuse and neglect reports involving allegations of criminal conduct.¹

Key findings

- ▶ Statute requires county attorneys to work with law enforcement and the Department to establish criminal child abuse and neglect joint investigation protocols; however, 7 county attorney's offices had not updated their protocols for more than 5 years risking unresponsiveness to changes in law, resources, or child welfare investigation practices.
- ▶ Department's website had some outdated joint protocols, potentially hindering public understanding and transparency of investigation processes and responsibilities.
- ▶ Law enforcement agencies reported elements of effective coordination and opportunities for strengthening coordination with the Department for joint criminal investigations of child abuse and neglect, including through cross-training.
- ▶ Department did not always timely complete and/or properly document some key investigative activities and notifications for reports we reviewed.²

Key recommendations to the Department

- ▶ Periodically review joint investigation protocol sections related to the Department to identify and communicate needed changes to county attorney's offices.
- ▶ Identify and implement outreach activities aimed at further strengthening coordination with law enforcement agencies on joint investigations of criminal child abuse and neglect.

¹ The Arizona Auditor General conducted this special audit of the Department pursuant to a September 18, 2024, resolution of the Joint Legislative Audit Committee.

² These findings were similar to our prior findings for the Department's noncriminal investigations—see Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*. Rather than making new recommendations, we will conduct work to assess the Department's correction of these issues for both noncriminal and criminal reports during subsequent followups on our September 2025 special audit.

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- ▶ Department is responsible for investigating allegations of child abuse and neglect
- ▶ Statute establishes a specialized unit within the Department to investigate reports alleging criminal child abuse and neglect and includes requirements to collaborate with county attorneys on developing the county attorney's offices' joint investigation protocols
- ▶ Department policies outline requirements for Department staff to respond to and investigate criminal allegations of child abuse and neglect
- ▶ Independent child welfare expert's review found Department policies and procedures for conducting investigations of criminal 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 some other states
- ▶ Department received 8,335 criminal reports from July 1, 2024 through December 1, 2025
- ▶ Department had 480 investigators who may investigate reports involving criminal conduct, and 88% of investigator positions were filled as of March 2026

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- ▶ Question 2: What are the applicable requirements related to initiating, conducting, and completing child abuse or neglect investigations?
- ▶ Question 3: What are the applicable time frames for initiating, conducting, and completing criminal child abuse or neglect investigations?
- ▶ Question 4: How do the Department's processes for investigating criminal reports compare to recommended practices?
- ▶ Question 5: Has the Department initiated, conducted, completed, and documented criminal child abuse and neglect investigations in accordance with its policy requirements and associated time frames?

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Seven county attorney's offices had not updated criminal child abuse and neglect joint investigation protocols for more than 5 years, risking unresponsiveness to changes in legislation, resources, or child welfare investigation practices, and Department had outdated protocols on its website for 7 of 15 counties, potentially hindering public understanding and transparency of investigation processes and responsibilities

- ▶ Seven of 15 county attorney's offices had not updated joint investigation protocols for more than 5 years, as suggested by recommended practices, risking that joint criminal child abuse and neglect investigations in those counties are unresponsive to changes in legislation, forensic science, resources, and emerging issues in child abuse and neglect investigations
- ▶ Department did not post updated joint investigation protocols on its website for 7 of 15 counties despite working with some counties on joint investigation protocol updates, potentially hindering public understanding and transparency of joint investigation processes, including each entity's roles and responsibilities
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- ▶ Law enforcement agencies we spoke with reported elements of effective coordination with the Department for joint investigations of criminal child abuse and neglect
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- ▶ Department reported it withheld specific allegations from individuals under investigation because providing the specific allegations could compromise the criminal investigation, but its case-management system lacked any information explaining its reasoning for doing so for most reports we reviewed
- ▶ Similar to our prior findings for the Department's noncriminal investigations, Department investigators did not always timely complete and/or properly document other key investigative activities and notifications in accordance with statutory and/or policy requirements for criminal reports we reviewed

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INTRODUCTION

The Arizona Auditor General has released the third report in a series of 3 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). The first special audit assessed whether the Department investigated noncriminal child abuse and neglect reports as required by statute and Department policy.¹ The second special audit assessed whether the Department investigated reports involving staff who work at Department-licensed child welfare agencies, as required by statute and Department policy.² This special audit reviewed the Department's processes for initiating and conducting investigations of child abuse and neglect reports involving allegations of criminal conduct.

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 between July 1, 2024 and December 1, 2025, including criminal reports).^{3,4} 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.⁵

¹ See Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*.

² See Arizona Auditor General report 26-112 *Arizona Department of Child Safety—Investigations of Reports Involving Child Welfare Agency (Group Home) Staff*.

³ 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 the purpose of manufacturing dangerous drugs; and unreasonable confinement of a child.

⁴ 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.

⁵ 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.

Pursuant to A.R.S. §§8-455 and 8-456, the Department is required to:

- ▶ Operate a centralized hotline for the public to report alleged child abuse and neglect.⁶
- ▶ 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.

Department classifies and investigates reports alleging child abuse and neglect as criminal and noncriminal

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.^{1,2,3}

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

- Domestic violence that involves a weapon occurring with a child present in the room.
- Threats 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 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 an alleged suicide that did not involve a firearm.

¹ According to A.R.S. §8-455, the suspected child victim must be a resident of the State or present in the State.

² 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.

³ As discussed on page 1, we reviewed the Department's practices for investigating noncriminal child abuse and neglect allegations in our first special audit report of this series, published on September 23, 2025 (see Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*).

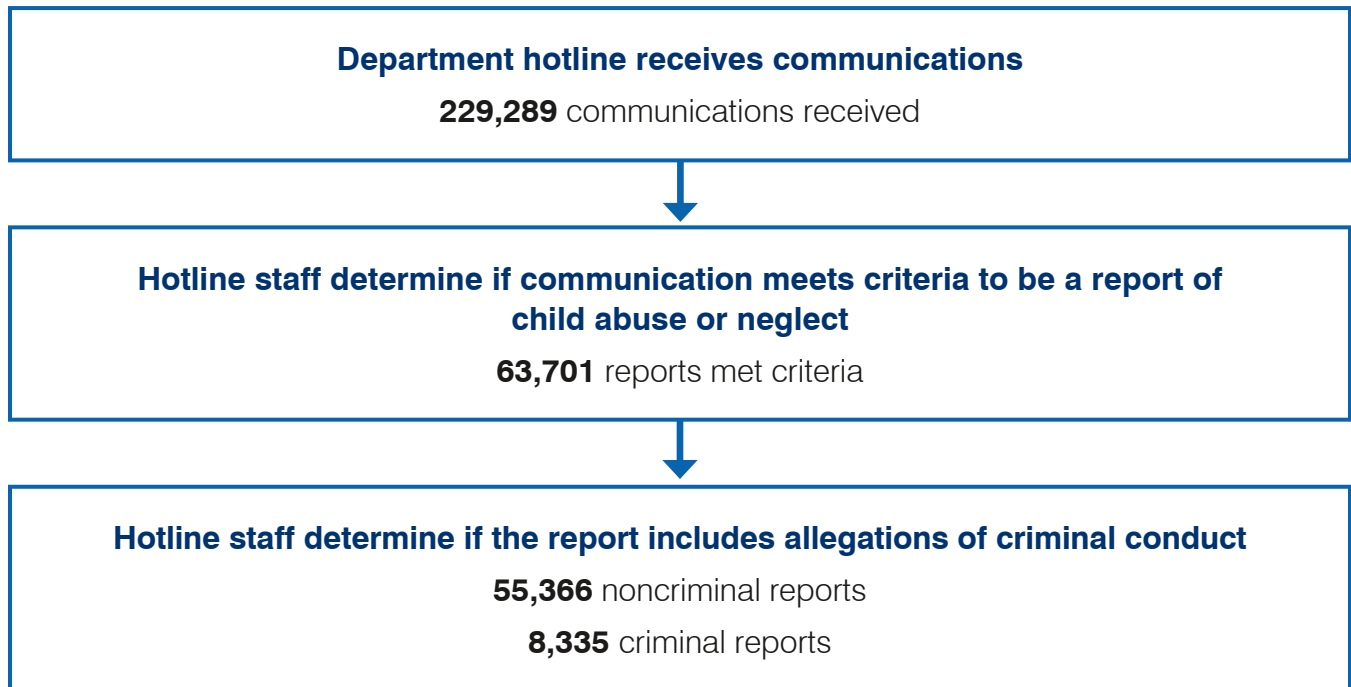
Source: Auditor General staff review of Department policies and procedures for child abuse and neglect investigations and A.R.S. §§8-201 and 8-455.

⁶ 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 5 through 6 for more information).

Figure 1

Department hotline staff determined that 8,335 communications the Department received met the criteria to be a criminal report of child abuse or neglect¹

July 1, 2024 through December 1, 2025



¹ See pages 5 through 6 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 and Department case-management system data.

Statute establishes a specialized unit within the Department to investigate reports alleging criminal child abuse and neglect and includes requirements to collaborate with county attorneys on developing the county attorney's offices' joint investigation protocols

A.R.S. §8-471 establishes the Office of Child Welfare Investigations (OCWI) within the Department. According to statute and Department policy, OCWI's duties include investigating, assessing, or responding to all reports the Department receives that include allegations of criminal child abuse and neglect, and coordinating with other parts of the Department and law enforcement (see pages 5 through 6 for more information on the statutory criteria for the minimum requirements that an allegation must meet to be considered a "report" of child abuse and neglect and Chapter 3, pages 27 through 28, for more information on OCWI investigating, assessing, or responding to criminal allegations).⁷ Statute requires OCWI to employ child welfare investigators who have received training to understand law enforcement's role in cases of criminal child abuse or neglect and in social services offered by the Department. According to

⁷ A.R.S. §8-471(B) and (E).

Department policy, OCWI investigators investigate reports of criminal child abuse and neglect in Maricopa, Pima, and Pinal Counties, and in all other counties, an OCWI joint investigative liaison will assess the report and provide the assigned Department field office investigator with direction.⁸ Although OCWI investigates reports to assess child safety and determine if they should propose to substantiate criminal child abuse or neglect pursuant to Arizona’s child safety laws, OCWI does not have the same role as a law enforcement officer, and only law enforcement agencies are responsible for investigating potential violations of Arizona’s criminal code related to allegations of criminal child abuse and neglect.⁹

Additionally, A.R.S. §8-817 requires each Arizona county attorney to develop, adopt, and implement joint investigation protocols in cooperation with other relevant parties, including the Department and law enforcement, to guide the conduct of investigations of allegations involving criminal child abuse and neglect (joint investigation protocols), and requires the Department, county attorneys, and law enforcement agencies to cooperate with each other pursuant to the joint investigation protocols.¹⁰ According to statute, the purpose of these joint investigation protocols is to ensure thorough investigations of criminal child abuse and neglect allegations, and each county’s protocol should establish the county’s standards for Department and law enforcement joint investigations of specific types of abuse and neglect, including timely forensic medical evaluations (see Chapter 1, pages 16 through 21, for more information on joint investigation protocols).

Department policies outline requirements for Department staff to respond to and investigate criminal 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.¹¹ Department policies, procedures, and/or guidance for conducting investigations require investigators to (1) complete and document various steps intended to protect children during the criminal investigation process, (2) assess child safety, and (3) obtain sufficient evidence to determine whether to substantiate an allegation of criminal child abuse or neglect.^{12,13}

⁸ According to Department policy, joint investigative liaisons serve to coordinate joint investigative efforts, problem solve investigative challenges, and support both the Department and law enforcement during a joint investigation.

⁹ A.R.S. §8-471(E) also requires the Department to immediately notify the appropriate law enforcement agency upon receipt of any report or information involving criminal conduct allegations if the agency has not already been notified (see textbox, page 2, for the statutory definition of criminal conduct allegations). According to Department policy, prior to conducting interviews with the family, investigators are required to contact local law enforcement and coordinate investigative efforts and interviews. Additionally, per Department policy, if the hotline receives an allegation that involves a suspected criminal offense that does not meet the statutory criteria to be a report of child abuse or neglect, the hotline staff should report the information to law enforcement in addition to directing the reporting source to notify law enforcement. Further, according to Department policy, if during an investigation, the investigator determined that an individual the Department does not have the statutory authority to investigate as an alleged perpetrator of child abuse or neglect, such as a child’s teacher, may have committed a criminal offense against a child, the investigator is required to immediately provide the information to the appropriate law enforcement agency.

¹⁰ According to A.R.S. §11-532, the county attorney is the county’s public prosecutor.

¹¹ 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.

¹² Department policy requires investigators to document all communications, required documents, notes, and contacts for criminal 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.

¹³ Some Department policies refer to its staff as specialists, and investigative specialists (investigators) are 1 type of Department specialist.

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

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

Upon receipt, 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.^{14,15} If so, 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. Further, if a communication does not meet the statutory criteria to be a report of alleged child abuse or neglect but is identified as including allegations of criminal conduct, hotline staff are required to cross-report the allegation to law enforcement in addition to directing the reporting source to notify law enforcement.

► **Hotline staff required to assign a priority level to each report of alleged abuse or neglect**

The Department's hotline staff are responsible for assigning a priority level to each report based on the type and severity of the child abuse or neglect allegation(s) (see textbox, page 6, for descriptions of Department priority levels for criminal reports).¹⁶

► **Hotline staff must identify reports with potential criminal allegations and assign them to OCWI or a local field office for investigation**

The Department's hotline staff are also responsible for determining whether the report's allegation(s) include criminal conduct, and if so, for classifying the report as involving criminal conduct in the Department's case-management system.¹⁷ After prioritization, the hotline staff then generally assign criminal reports in Maricopa, Pima, and Pinal Counties to OCWI and criminal reports in the other 12 counties to a Department local field office for a criminal conduct investigation.^{18,19} For reports assigned to a Department local field office, an OCWI joint investigative liaison is required to assess the report and provide the assigned Department local field office investigator with direction.²⁰

¹⁴ 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.

¹⁵ Hotline staff are also responsible for determining whether the communication concerns are abuse and/or neglect allegations.

¹⁶ 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.

¹⁷ Per A.R.S. §8-471(E), if the appropriate law enforcement agency has not already been notified, the Department is required to immediately notify the agency upon receipt for any report or information involving criminal conduct allegations.

¹⁸ According to the Department, it generally assigns reports based on the zip code of the home where the maltreatment occurred or the home of the child's primary caretaker.

¹⁹ According to the Department, if the Department receives a new criminal report related to a family that already has a noncriminal report under investigation by a local field office investigator in Maricopa, Pima, or Pinal Counties, the local field office investigator will generally investigate the new criminal report instead of OCWI as long as the criminal report is not related to a child fatality.

²⁰ As of March 2026, the Department had 2 OCWI joint investigative liaisons. According to the Department's OCWI joint investigative liaisons, to identify the reports they should assess, they review the Department's case-management system daily to identify reports assigned to Department local field offices that have been classified as having criminal conduct.

Department policy outlines priority levels and required response time frames for criminal child abuse and neglect reports

The Department is statutorily required to determine the priority level of all reports of alleged child abuse and neglect, including criminal reports.¹ Department policy establishes priority levels for all reports of alleged child abuse and neglect and requires investigators to respond with in-person contact/attempted contact with the child victim within specific time frames.²

Descriptions of criminal report priority levels and the required response time frames according to Department policies and procedures are as follows:

▶ **Priority 1 (2-hour response time)**

A criminal report alleging death, near fatality, or other serious injury to a child, or that a child may be the victim of sexual abuse.

▶ **Priority 2 (48-hour response time)**

Any criminal report not labeled as a priority 1.

¹ 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.

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

▶ **Investigators must coordinate with law enforcement prior to making contact with the family**

For criminal conduct investigations, Department policy requires the assigned investigator to coordinate investigative efforts and interviews with the law enforcement agency that has jurisdiction for criminal investigations where the criminal allegation occurred prior to making contact with the family. Department policy also requires Department investigators to develop a plan with law enforcement to complete the investigation, communicate openly and frequently to discuss the status of the case, and share information in a timely manner.

▶ **Investigators must gather background information**

Department policy requires that investigators must gather background information, such as obtaining and reviewing background checks and prior allegations for the alleged perpetrator and alleged child victim's medical and school records.

► **Investigators are 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 6, for investigator criminal response time frames by priority level).²¹ According to Department policy, if law enforcement is not able to respond jointly within the Department's response time requirements, the investigator should communicate to the law enforcement agency that the Department is proceeding with its investigation of child safety and make the child contact without law enforcement. 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.

► **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 page 9 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.²²

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 caretaker is unable to perform essential responsibilities due to substance use; a child who is incapable of care for themselves is alone and unsupervised; or the home's physical conditions 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.

²¹ The Department has an after hours investigation team that may make initial contact for reports received outside of business hours, such as the weekend, depending on the report's priority level.

²² 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.

► **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 take 1 of the following steps: (1) get parent or guardian consent to place the child in the Department's custody temporarily, referred to as voluntary placement, (2) obtain a court order, referred to as court authorized removal, or (3) serve a Temporary Custody Notice without court authorization if exigent circumstances exist.^{23,24,25} According to A.R.S. §8-823 and Department policy, the child's 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.^{26,27} 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.²⁸

► **Investigators must interview family and others living in the child's home and inform individuals under criminal 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.²⁹

²³ 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.

²⁴ A.R.S. §§8-821 through 8-823.

²⁵ According to statute, the Department can take a child into temporary custody pursuant to an order of the superior court.

²⁶ 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.

²⁷ If a child who is removed from their home is eligible for membership in or is 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.

²⁸ 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.

²⁹ 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, according to A.R.S. §8-471(E)(8), the Department is not required to provide the parent, guardian, or custodian with details or information that would compromise an ongoing criminal investigation.

► **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.^{30,31} 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 actions to be taken to ensure the child's basic needs and safety are met.^{32,33} Department policy requires supervisors to be involved in the development and approval of the Safety Plan.³⁴

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

Investigators must enter 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 request to propose to substantiate the allegations, unsubstantiate the allegations, or determine that the Department is unable to locate the child victim (see textbox, page 10, for key investigative finding terms).^{35,36}

³⁰ According to the Department, the purpose of the Family Functioning Assessment is to gather sufficient and relevant information to make informed decisions about whether the child is safe or unsafe.

³¹ According to Department policy, the investigator is not required to complete a Family Functioning Assessment under specific circumstances, such as reports involving out-of-home caregivers, including foster parents or group home staff, unless the alleged child victim is the caregiver's biological or adoptive child, or reports where the child victim is deceased and the Department has confirmed that the child victim has no surviving siblings.

³² 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.

³³ 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.

³⁴ 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.

³⁵ According to Department policy, for reports where the investigator requests to propose to substantiate the allegations, supervisors have 5 days to approve or modify the investigator's entered investigation findings. The Department reported that once the supervisor approves the request, the finding status is changed to proposed to substantiate. Based on our review of the Department's case-management system, the Department's case-management system does not automatically approve the investigator's findings if the supervisor misses their 5-day deadline.

³⁶ According to Department policy, for criminal reports, investigators require prior approval from the OCWI chief or the assigned program administrator to enter a finding of unable to locate, and criminal reports cannot be closed as unable to locate without approval from the OCWI deputy chief or the assigned program administrator.

Key investigative finding terms

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

Unsubstantiated: Used when the evidence gathered throughout the investigation does not support that 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 document information about the joint criminal investigation**

Investigators must document information about the joint criminal investigation in the Department's case-management system throughout the investigation. For example, investigators must document information such as which law enforcement agency it coordinated with, the law enforcement officer(s)' name and contact information, the corresponding law enforcement report number, and the outcome of the joint investigation.

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

Investigators must make efforts to close the investigation within 60 days of receipt of the report, as required by Department policy.^{37,38} The investigator must also notify the alleged perpetrator of the criminal investigation finding determination once the investigation is closed by providing them with an official notice of proposed substantiation or unsubstantiated, according to Department policy.³⁹

³⁷ The Department's policy does not define "make efforts."

³⁸ 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.

³⁹ 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.

Independent child welfare expert’s review found Department policies and procedures for conducting investigations of criminal 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 some other states

We contracted with the Child Welfare League of America (CWLA) to obtain expert consulting services related to child welfare practices, and CWLA found that the Department’s investigative process sets clear standards for timeliness and safety management and places a strong emphasis on legal and procedural safeguards.^{40,41} CWLA found the Department’s investigative process, as outlined in the Department’s policies and procedures, includes a structured safety assessment, legally grounded findings, and firm timelines that support accountability, child safety, and transparent decision making.

For example, CWLA found that:

- ▶ The Department’s investigation framework:⁴²
 - Emphasizes documentation as a central tenet of the process.
 - Establishes clear standards for timeliness and safety 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.
- ▶ 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.⁴³ Further, CWLA 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.

⁴⁰ 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.

⁴¹ We contracted with CWLA to conduct an independent review of the Department’s process for conducting investigations of allegations of child abuse and neglect reports.

⁴² According to CWLA, recommended practices it 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; 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; and completing timely and thorough investigation closure documentation that reflects the investigation findings.

⁴³ 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.

Department received 8,335 criminal reports from July 1, 2024 through December 1, 2025

According to Department data, the Department received 8,335 reports involving criminal abuse and/or neglect allegations from July 1, 2024 through December 1, 2025 (see textbox for criminal reports by county during this time period).⁴⁴ As of January 2026, of the 8,335 criminal reports, 730 were open and 7,605 were closed.⁴⁵

Number of criminal child abuse and neglect reports the Department received between July 1, 2024 and December 1, 2025 by county		
Apache County—34	Greenlee County—9	Pima County—1,219
Cochise County—161	La Paz County—18	Pinal County—701
Coconino County—127	Maricopa County—4,974	Santa Cruz County—27
Gila County—63	Mohave County—325	Yavapai County—287
Graham County—62	Navajo County—120	Yuma County—206
Source: Auditor General staff review of Department criminal child abuse and neglect investigation data.		

Department had 480 investigators who may investigate reports involving criminal conduct, and 88% of investigator positions were filled as of March 2026

As discussed on page 5, although any Department local field office investigator can investigate reports involving criminal conduct, OCWI generally investigates criminal reports in Maricopa, Pima, and Pinal Counties, and the Department’s local field office investigators investigate criminal reports in the State’s other 12 counties.⁴⁶ According to the Department, as of March 2026, 88% of its 547 investigator positions that may investigate criminal reports were filled (see Table 1 for more information on the total number of filled and vacant positions as of March 2026).

Table 1
Department had 413 filled field office investigator positions and 67 filled OCWI investigator positions that may investigate criminal reports as of March 2026

Investigative unit	Investigator positions			Supervisor positions		
	Filled	Vacant	Filled rate	Filled	Vacant	Filled rate
Field offices	413	52	89%	93	2	98%
OCWI	67	15	82%	13	1	93%
Total	480	67	88%	106	3	97%

Source: Auditor General staff review of Department-provided staffing information as of March 2026.

⁴⁴ Of the 8,335 reports, 1,648 were priority 1; 6,616 were priority 2; 70 were priority 3; and 1 was priority 4.

⁴⁵ According to Department case-management system data, as of January 9, 2026, 196 of the 730 open criminal reports had been open for 60 days or less, and the remaining 534 criminal reports had been open between 61 and 486 days.

⁴⁶ As discussed on page 5, according to the Department there are situations where a local field office investigator in Maricopa, Pima, and Pinal Counties will investigate a criminal report instead of OCWI.

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Questions and answers

Question 1: What are the different types of child abuse and neglect investigations that the Department conducts?

The Department conducts investigations of criminal and noncriminal allegations of child abuse. Specifically, 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 Introduction, page 2, for more information on criminal and noncriminal reports). During this third audit, we reviewed the Department's investigations of criminal reports of child abuse and neglect.

Question 2: What are the applicable requirements related to initiating, conducting, and completing child abuse or neglect investigations?

The Department is required by statute to investigate alleged child abuse and neglect, and Department policies and procedures establish various requirements related to initiating, conducting, and completing child abuse investigations, including:

▶ **Initiating child abuse and neglect investigations**

Department policies and procedures require hotline staff to determine if communications regarding suspected child abuse and neglect meet the statutory definition of a report that the Department is required to investigate and, if so, to assign a priority level to each report. Hotline staff are also required to assign reports to the appropriate investigative unit, such as OCWI for criminal reports in Maricopa, Pima, and Pinal Counties. Department investigators are required to make reasonable efforts to contact the child victim in person at their known or probable location within specific time frames (see Introduction, page 6, for the required contact time frames).

▶ **Conducting child abuse and neglect investigations**

Department policies and procedures require investigators to gather background information on the report, including the alleged perpetrator; interview alleged child victim(s), alleged perpetrator(s), and other individuals, such as family members, and gather and review any relevant information that may help substantiate or refute the allegation(s).

▶ **Completing child abuse and neglect investigations**

Department policies and procedures require all investigators to determine and document investigation findings in the Department's case-management system, make efforts to close the investigation, and notify the alleged perpetrator of the investigation finding once the investigation is closed.

Question 3: What are the applicable time frames for initiating, conducting, and completing criminal child abuse or neglect investigations?

Statute and Department policy establish several time frames within which the Department is required to initiate, conduct, and complete criminal child abuse and neglect investigations as follows:

- ▶ Department policy establishes priority levels for reported criminal allegations and requires investigators to respond with in-person contact/attempted contact with the child victim within the following specific time frames (see Introduction, page 6, for more information on these time frame requirements and descriptions):¹

- **Priority 1 allegation**—Respond within 2 hours.
- **Priority 2 allegation**—Respond within 48 hours.

¹ See Introduction, page 6, for more information on criminal child abuse and neglect reports' priority levels and required response time frames.

- ▶ Pursuant to A.R.S. §8-456, Department investigators must enter their written investigation findings into the Department’s case-management system within 45 days of report receipt.
- ▶ Department policy requires investigators to make efforts to close the investigation within 60 days of report receipt.

Question 4: How do the Department’s processes for investigating criminal reports compare to recommended practices?

CWLA’s independent review of the Department’s processes for conducting investigations of 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—both its 45-day time frames for staff to complete the Family Functioning Assessment and to enter investigation findings into its case-management system after investigation completion—are consistent with practices from 30% of other states (see Introduction, pages 4 through 10, for more information on the Department’s processes for investigating reports of child abuse and neglect). 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.²

Question 5: Has the Department initiated, conducted, completed, and documented criminal 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 largely complied with time frames for initial contact with child victims for criminal reports it received from July 1, 2024 through December 1, 2025. Specifically, our review of Department case-management system data for all 8,335 criminal reports that the Department received from July 1, 2024 through December 1, 2025, 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 95% of all criminal reports.³ 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 15 of 8,335 reports of criminal child abuse or neglect the Department received from July 1, 2024 through December 1, 2025, identified at least 1 instance of Department policy noncompliance in 13 of 15 criminal reports we reviewed (see Appendix A, pages a-1 through a-4, for more information).

² 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.

³ For the reports that were untimely, the Department’s initial contact/attempted contact with the alleged child victim was between 3 minutes to approximately 44 days past the required response time frame.

Seven county attorney's offices had not updated criminal child abuse and neglect joint investigation protocols for more than 5 years, risking unresponsiveness to changes in legislation, resources, or child welfare investigation practices, and Department had outdated protocols on its website for 7 of 15 counties, potentially hindering public understanding and transparency of investigation processes and responsibilities

Seven of 15 county attorney's offices had not updated joint investigation protocols for more than 5 years, as suggested by recommended practices, risking that joint criminal child abuse and neglect investigations in those counties are unresponsive to changes in legislation, forensic science, resources, and emerging issues in child abuse and neglect investigations

Our review of all 15 counties' joint investigation protocols found that, as of May 2026, 7 of 15 had not been updated by county attorneys within 5 years and ranged from 7 to 22 years old, inconsistent with recommended practices (see textbox for more information about counties with joint investigation protocols that had not been updated for more than 5 years and Table 2, pages 19 through 20, for more information about the date of each county's protocol as of May 2026). Recommended practices from the Child Welfare League of America (CWLA) suggest that, without updating joint investigation protocols every 5 years, agencies risk being unresponsive to changes in legislation, forensic science, and emerging issues in child abuse investigations. Further, without joint investigation protocols that are updated every 5 years, prosecutors, law enforcement agencies, the Department, and other entities involved in joint investigations risk being unresponsive to or unaware of changes in counties' available resources. For example, the Navajo County Attorney's Office and Santa Cruz County Attorney's Office reported they updated their respective county's joint investigation protocols in 2025 and 2026, respectively, to reflect changes to county resources

As of May 2026, 7 counties' joint investigation protocols have not been updated for more than 5 years

- ▶ Apache County
- ▶ Graham County
- ▶ Greenlee County
- ▶ La Paz County
- ▶ Maricopa County¹
- ▶ Yavapai County¹
- ▶ Yuma County¹

¹ As of May 2026, this county attorney's office reported it was in the process of updating its joint investigation protocols.

Source: Auditor General staff review of all 15 counties' joint investigation protocols as of May 2026.

available for joint criminal investigations of child abuse and neglect, such as grant monies for sexual assault exams and the increased availability of forensic interviewers.^{1,2}

Although county attorneys are ultimately responsible for updating these joint investigation protocols and the Department cannot require counties to do so, the Department could develop a standard process for reviewing county joint investigation protocol sections relevant to the Department and making county attorneys aware of outdated joint protocols that do not reflect the Department's processes, changes to legislation related to the Department, changes in Department resources, and/or emerging issues in child abuse and neglect investigations.^{3,4} According to the Department, the joint investigation protocols highlight each investigative partner's roles, responsibilities, and commitment to criminal child abuse and neglect investigations. Additionally, according to Maricopa County's joint investigation protocols, the protocols provide a consistent and efficient approach to the investigation, prosecution, and management of criminal child abuse and neglect cases. Informing county attorneys of modifications needed to the joint investigation protocol sections related to the Department could help the Department increase the likelihood that the joint investigation protocols accurately reflect and highlight to its partners and the public its roles and responsibilities in the joint investigation process.

Department did not post updated joint investigation protocols on its website for 7 of 15 counties despite working with some counties on joint investigation protocol updates, potentially hindering public understanding and transparency of joint investigation processes, including each entity's roles and responsibilities

Our review of joint investigation protocols provided by and/or joint investigation protocol information reported by all 15 counties and all 15 counties' joint investigation protocols on the Department's website as of May 2026 found that the Department had not posted updated joint

¹ In 2025, the Navajo County Attorney's Office established 2 new joint investigation protocols for criminal child abuse and neglect investigations, the first to be used only for allegations of sexual abuse against a child aged 11 and older, and the second to be used for allegations of sexual abuse of a child under the age of 11 and all other nonsexual child abuse and neglect criminal allegations. According to the Navajo County Attorney's Office, it established the joint investigation protocol for allegations of sexual abuse against children aged 11 and older because it receives monies to maintain a sexual assault response team from a Governor's Office grant specifically aimed at stopping violence against women and girls aged 11 and older. Additionally, according to the Navajo County Attorney's Office, the age distinction in its joint investigation protocols is also in place because sexual assault exams are different for pre- and postpubescent children, and sexual assault nurses receive specific training based on the child's age and development stage.

² In April 2026, the Santa Cruz County Attorney's Office updated its joint investigation protocol to include guidance about where forensic interviews should occur. According to the Santa Cruz County Attorney's Office, its joint investigation protocol reflects a change in available resources in Santa Cruz County after a forensic interviewer became available within the county 24 hours a day, 7 days a week—a key resource in child abuse investigations that the County did not previously have. According to the Santa Cruz County Attorney's Office, prior to this change, the County only had a forensic interviewer available 1 day per week, and for the other days of the week, forensic interviewers in Tucson were used. Additionally, the Santa Cruz County Attorney's Office's updated April 2026 joint investigation protocol includes guidance about the role of the Multidisciplinary Team (MDT) and establishes regular MDT meetings to serve as a forum for sharing information, addressing issues, and reviewing cases.

³ According to A.R.S. §8-817(B), to ensure thorough investigations of those accused of crimes against children, in each county, the county attorney, in cooperation with the sheriff, the chief law enforcement officer for each municipality in the county, and the Department shall develop, adopt, and implement protocols to guide the conduct of investigations of allegations involving criminal conduct.

⁴ According to the Department, although it does not have a standard process for doing so, it has attempted to work with county attorney's offices in the past regarding updating the county attorney's joint investigation protocols. For example, the Department corresponded with and attempted to schedule meetings with 1 county attorney's office over the span of several months regarding updating the joint investigation protocol, and according to the Department, the county attorney's office ultimately reported to the Department that it did not have time or staff available to update the joint investigation protocol at that time.

investigation protocols for 7 counties on its website.^{5,6} For example, the Department's website included a joint investigation protocol that predated the county's active joint investigation protocol by 21 years. The Department did not post updated joint investigation protocols on its website despite 3 county attorney's offices reporting that they coordinated with Department staff on updating the joint investigation protocols as recently as calendar year 2025 and the Department's previous director having signed 1 of the updated joint investigation protocols provided by a county (see Table 2, pages 19 through 20, for more information on which outdated joint investigation protocols were posted on the Department's website).

For example:

- ▶ Despite the Navajo County Attorney's Office updating the county's joint investigation protocol as recently as 2025 and a Department representative having signed a memorandum of understanding related to the updated joint investigation protocol, as of May 2026, the Department's website had Navajo County's outdated 2004 joint investigation protocol.⁷
- ▶ Despite the Pinal County Attorney's Office updating its joint investigation protocols as recently as 2023 and the Department's previous director having signed the updated joint investigation protocols, as of May 2026, the Department's website had Pinal County's outdated 2018 joint investigation protocol.

Additionally, when we asked the Department in November 2024 and again in May 2026 if the joint investigation protocols on its website were the most up to date, the Department reported that to its knowledge they were up to date.

According to the Department, posting the joint investigation protocols on its website provides public transparency into the joint investigation process, including providing information on the respective roles and responsibilities of each entity involved in the process. As a result, by posting outdated joint investigation protocols on its website, the Department risks hindering the public understanding and transparency of the joint investigation process.

⁵ We reviewed the county joint investigation protocols provided by Cochise, Coconino, Mohave, Navajo, Pinal, Santa Cruz, and Yuma Counties. We also reviewed information about joint investigation protocols reported by county attorney's offices in Apache, Gila, Graham, Greenlee, La Paz, Maricopa, Pima, and Yavapai Counties.

⁶ The Department's policy provides staff with a link to the protocols posted on the Department's publicly available website.

⁷ According to the Department, a field supervisor signed this joint investigation protocol.

Table 2

For 7 counties, the Department had outdated joint investigation protocols on its website that predated the counties' current joint investigation protocols by 4 to 21 years

As of May 2026

County	Date of county's joint investigation protocol as of May 2026	Date of joint investigation protocol on the Department's website	Difference in years between Department website and county joint investigation protocols
Department's website joint investigation protocol older than county's joint investigation protocol			
Navajo	2025 ¹	2004	21 years
Coconino	2021 ¹	2006	15 years
Santa Cruz	2026	Pre-May 2014 ²	At least 12 years
Mohave	2022	Pre-May 2014 ²	At least 8 years
Yuma	2019	Pre-May 2014 ²	At least 5 years
Pinal	2023	2018	5 years
Cochise	2023	2019	4 years
Department's website joint investigation protocol and county's joint investigation protocol are the same ³			
Apache	2004	2004	N/A ⁴
Gila	2024 ¹	2024	N/A ⁴
Graham	Pre-May 2014	Pre-May 2014 ²	N/A ⁴
Greenlee	Pre-May 2014	Pre-May 2014 ²	N/A ⁴
La Paz	Pre-May 2014	Pre-May 2014 ²	N/A ⁴
Maricopa	2016 ¹	2016	N/A ⁴
Pima	2022 ¹	2022	N/A ⁴
Yavapai	2012 ¹	2012	N/A ⁴

Table 2 continued

- ¹ As of May 2026, this county attorney's office reported it was in the process of updating its protocols.
- ² This joint investigation protocol refers to CPS as the State's child protective agency; however, CPS was terminated in 2014 by a Governor executive order, and Laws 2014, 2nd S.S., Ch. 1, §20, established the Department effective May 2014. These protocols do not have an effective or revised date, but with the reference to CPS, we have determined these protocols have not been updated since May 2014.
- ³ Although the county's active joint investigation protocol and the joint investigation protocol on the Department's website are the same, as of May 2026, inconsistent with CWLA recommended practices, 6 of these joint investigation protocols have not been updated for more than 5 years (see Chapter 1, pages 16 through 17, for more information).
- ⁴ As of May 2026, this county's active joint investigation protocol and the joint investigation protocol on the Department's website are the same.

Source: Auditor General staff review of the Department's joint investigation protocols with county attorneys and law enforcement agencies as of May 2026, joint investigation protocols on the Department's website as of May 2026, and Laws 2014, 2nd, S.S. Ch. 1, §20.

In response to our audit, in May 2026, the Department began efforts to contact several county attorney's offices to help ensure it had the most up-to-date joint investigation protocols on its public website.

Department lacks documented processes for regularly reviewing joint investigation protocols and informing county attorney's offices of needed updates to information related to the Department in county protocols

The Department lacks a documented process, such as written policies, procedures, or guidance, for regularly reviewing joint investigation protocols and communicating and/or coordinating with county attorney's offices to ensure they are aware of changes in the Department's processes and resources, legislation related to the Department and/or child abuse and neglect investigation practices, or updating protocols on its website when county attorney's offices update protocols.

For example, the Department lacks documented processes for:

- ▶ Periodically reviewing counties' joint investigation protocols to determine if they accurately reflect its current investigative processes.
- ▶ When and how it should inform county attorney's offices of changes in its processes, policies, statutes, or industry standards that could result in the county's joint investigation protocol sections related to the Department being inaccurate.
- ▶ Periodically contacting county attorney's offices to determine if they have revised and/or are planning to revise their joint investigative protocols.
- ▶ Working with county attorney's offices when requested to update joint investigation protocols, including outlining staff roles, responsibilities, and expertise for doing so.

Further, the Department reported that potentially unauthorized staff worked with counties to update protocols. For example, when we informed the Department that some counties reported they were actively working with Department staff to update their joint investigative protocols, the Department reported that it believed Department staff without the appropriate expertise or authority to represent the Department were potentially working with the counties to update joint investigation protocols. Additionally, according to the Department, it does not have a formal process for how its

staff who sign updated joint investigation protocols should communicate with the Department staff responsible for posting the updated joint investigation protocols to the Department's website.

As of June 2026, the Department reported it is working to develop a documented process for ensuring that it has the most up-to-date joint investigation protocols on its website and periodically communicating with county attorney's offices to offer suggestions on the counties' joint investigation protocols.

Recommendations to the Department

1. Contact the 7 county attorney's offices that had updated joint investigation protocols that were not posted to the Department's website as of May 2026 to request the most up-to-date joint investigation protocols for the county and post the counties' updated county joint investigation protocols on its website accordingly.
2. Develop and implement written policies, procedures, and/or guidance including staff roles and responsibilities for periodically reviewing each county's joint investigation protocol sections related to the Department to identify and communicate needed changes to county attorney's offices; working with county attorney's offices when requested to update joint investigation protocols; periodically contacting county attorney's offices to request the most up-to-date joint investigation protocols for the county; and posting updated joint investigation protocols on its website after receiving them.
3. After establishing its written policies, procedures, and/or guidance, inform each county attorney's office of the Department staff and/or position title responsible for working with the county attorney's office when the county attorney's office updates its joint investigation protocols.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement or implement in a different manner the recommendations.

Law enforcement agencies reported elements of effective coordination and opportunities for strengthening coordination with the Department during joint investigations of child abuse and neglect, including through cross-training

Our interviews with staff at 9 law enforcement agencies throughout the State regarding their interactions and coordination with the Department on joint investigations of criminal child abuse and neglect found there were elements of effective coordination and areas that could be improved.^{1,2} We interviewed staff identified by their law enforcement agency as regularly working/interacting with the Department on joint investigations, including patrol officers, investigators, sergeants, and/or commanders. Additionally, our interview questions were designed to obtain information about interactions with the Department during joint investigations of criminal child abuse and neglect and did not focus on other interactions with the Department.

Law enforcement agencies we spoke with reported elements of effective coordination with the Department for joint investigations of criminal child abuse and neglect

Staff at law enforcement agencies we interviewed reported some elements of effective coordination with the Department, including:

- ▶ All 9 law enforcement agencies reported that the Department provides useful information for their criminal investigations, such as background information and the family's history of interactions with the Department.
- ▶ All 9 law enforcement agencies reported that when Department staff and law enforcement are in close geographical/physical proximity, it allows for more expedient coordination (see page 24 for issues 2 law enforcement agencies reported with their lack of proximity to Department staff).
- ▶ 8 of 9 law enforcement agencies reported in-person multidisciplinary team (MDT) meetings to discuss active criminal investigations can provide useful information and insights that benefit joint investigations (see page 24 for issues 2 law enforcement agencies reported related to Department staff attendance at MDT meetings).³ For example, 1 law enforcement agency reported that MDT meetings provide an opportunity for the Department and law enforcement to discuss and collaborate on open, joint investigations; discuss and work to resolve reoccurring coordination issues; and discuss or obtain training on joint investigations.

¹ We interviewed law enforcement staff between January 2026 and April 2026 in the following counties: Apache, Maricopa, Mohave, Navajo, Pima, Santa Cruz, Yavapai, and Yuma. We considered various factors when selecting law enforcement agencies to interview, including population, geographic location, and other risk factors, such as access to services.

² Three of 9 law enforcement agencies we interviewed are located in Maricopa and Pima Counties, where OCWI investigates reports of criminal child abuse and neglect.

³ Law enforcement reported that MDT meetings are intended to discuss open, joint investigations and address investigatory challenges and can include county attorney's offices, local law enforcement agencies, the Department, and other professionals involved in criminal child abuse and neglect investigations.

Law enforcement agencies we spoke with also reported some barriers to effective coordination with the Department for joint investigations of criminal child abuse and neglect

Staff at all 9 law enforcement agencies we interviewed also reported at least 1 area where their interactions and coordination with the Department for joint investigations of criminal child abuse and neglect reports could be improved, including:

- ▶ 7 of 9 law enforcement agencies reported that some Department investigators appear to lack an understanding of law enforcement's role in an investigation, which can lead to challenges during joint investigations. Specifically, law enforcement agencies reported that some Department staff, especially those who are newer to investigations, are sometimes unaware that law enforcement's primary responsibility in the joint investigation is to gather enough evidence to determine if a crime has been committed to support the arrest and potential prosecution of an alleged perpetrator.⁴ For example, 1 law enforcement agency we interviewed reported an instance in which newer Department staff expected law enforcement officers to facilitate family interaction, which the law enforcement agency reported is typically facilitated by Department staff. These instances of misunderstanding of agency-specific roles could result in investigation delays or additional work completed by law enforcement that Department staff should complete.⁵
- ▶ 6 of 9 law enforcement agencies reported that Department investigators have contacted alleged child victims and/or alleged perpetrators prior to contacting law enforcement, increasing the risk of alerting suspects that they are under criminal investigation prior to when law enforcement intended to make their investigation known to the suspect(s), which could compromise the level of evidence collected by law enforcement and hinder investigations (see Introduction, page 6, for more information on the Department's required initial response time frames for ensuring child safety and Chapter 3, pages 27 through 28, for more information about our review of Department requirements for investigator coordination with law enforcement agencies prior to making or attempting to make contact with the child and/or alleged perpetrator).⁶
- ▶ 3 of 9 law enforcement agencies reported that they have been required to follow inconsistent processes to obtain investigative information and documentation from the Department, delaying when law enforcement agencies receive information. For example, all 3 law enforcement agencies reported that, although they sometimes receive information quickly and easily from the Department, they have also been required by the Department to perform additional steps to access investigative information, such as submitting public records requests or subpoenaing information. According to the Department, the process for law enforcement to obtain information from the Department may differ depending on if the request is related to a joint investigation with the Department or a law enforcement investigation that does not involve the Department. For example, the Department reported that if law enforcement requests information for an investigation that is not being jointly

⁴ According to the Department, when possible, it assigns criminal reports to experienced investigators rather than new investigators.

⁵ Law enforcement personnel who reported this challenge did not report how frequently it occurs.

⁶ Law enforcement personnel who reported this challenge did not report how frequently it occurs.

investigated by the Department, law enforcement may be required to go through a formal records request process or obtain a court order. Law enforcement personnel who do not understand and/or are unaware of these differences for obtaining investigative information depending on the type of investigation could experience frustration with obtaining information from the Department.⁷

- ▶ 2 of 9 law enforcement agencies reported difficulties in coordinating with the Department because of the geographic location of the nearest local Department field office, potentially increasing investigation times and hindering law enforcement staff from performing other duties important to public safety (see textbox for an example of a situation a law enforcement agency reported where the Department's geographic location hindered law enforcement staff from performing other duties).⁸

Example of a law enforcement reported situation that negatively impacted law enforcement because of the geographic location of the nearest local Department field office

The law enforcement agency responded to a call, and it appeared that the parents were abusing the children. The law enforcement agency arrested the parents and made contact with the Department to take the children into Department custody. A law enforcement officer stayed with the children while waiting for the Department to arrive. The law enforcement officer had to wait multiple hours until Department staff could respond and see to the children's safe placement because the closest Department field office is in a different county. While the officer was waiting with the children, the officer was unable to perform other duties important to public safety, such as responding to other emergency calls.

Source: Auditor General staff interview with law enforcement agency staff.

- ▶ 2 of 9 law enforcement agencies reported Department staff do not always attend MDT meetings, negatively impacting communication between Department staff and law enforcement during joint investigations. As mentioned previously, most law enforcement agencies reported MDT meetings can provide law enforcement with useful information and insights that benefit joint investigations and can provide an opportunity for the Department and law enforcement to discuss and collaborate on open, joint investigations; discuss and work to resolve reoccurring coordination issues; and discuss or obtain training on joint investigations.

⁷ Law enforcement personnel who reported this challenge did not report how frequently it occurs.

⁸ As of June 2026, the Department has field offices in 12 of 15 counties. The 3 counties without a Department field office as of June 2026 were Apache, Greenlee, and La Paz Counties. As discussed in the Introduction, page 12, the Department received 9 criminal reports in Greenlee County, 18 criminal reports in La Paz County, and 34 criminal reports in Apache County between July 1, 2024 and December 1, 2025. These 3 counties accounted for 0.7% of the 8,335 criminal reports the Department received during this time period.

Law enforcement agencies reported some practices they believe would further strengthen coordination with the Department during joint investigations of child abuse and neglect

Some law enforcement agency staff we interviewed reported practices they believe could improve the quality of coordination in joint investigations, including:

- ▶ 7 of 9 law enforcement agencies reported that further cross-training between the Department and law enforcement would be beneficial to help law enforcement officers and Department investigators better understand the respective roles, responsibilities, and goals during a joint investigation.⁹

Additional cross-training could help law enforcement officers and Department investigators better understand the respective roles, responsibilities, and goals regarding:

- Requirements for Department and law enforcement investigation response time frames. One law enforcement agency reported that training could improve a mutual understanding of the Department's and law enforcement's respective response time frame expectations.¹⁰
- Requirements for taking a child into the Department's temporary custody. Some law enforcement agencies expressed interest in better understanding the criteria the Department has for removing a child. As discussed in the Introduction, the Department has various requirements to take a child into temporary custody (see Introduction, page 8, for more information on Department policy related to temporary custody of children).

Cross-training on Department and law enforcement goals/needs could help to improve a mutual understanding of response expectations and improve alignment of the Department and law enforcement agencies during joint investigations.

- ▶ 4 of 9 law enforcement agencies reported that more in-person interaction between law enforcement and the Department could help with relationship building and/or improved coordination during joint investigations. For example, similar to the positive impact law enforcement reported regarding useful information and insights into joint investigations Department staff provide when attending MDT meetings, 7 of 9 law enforcement agencies we interviewed reported that in-person contact is the most effective method to coordinate investigations.

⁹ Department staff reported training with law enforcement, specifically providing training to new officers in the academies, would be beneficial.

¹⁰ See Introduction, page 6, for more information on Department initial response time frames.

When we shared these suggestions with the Department, it reported that it is committed to enhancing its relationships with law enforcement agencies and will actively seek additional opportunities to collaborate with and educate law enforcement personnel related to joint investigations.

Recommendation to the Department

4. Identify and implement outreach activities aimed at further strengthening coordination with law enforcement agencies on joint investigations of criminal child abuse and neglect, such as developing and/or updating educational information or materials that can be provided to law enforcement agencies regarding the Department's joint investigation roles and responsibilities; soliciting input from law enforcement agencies on areas for improved collaboration; conducting cross-training events on specific topics of interest and/or with specific law enforcement agencies based on input it receives; and identifying opportunities for further in-person interactions between Department investigators and law enforcement personnel who work on joint investigations.

Department response: As outlined in its [response](#), the Department agrees to the finding and will implement in a different manner the recommendation.

Department met 2 key criminal joint investigation requirements for most criminal child abuse and neglect reports we reviewed, consistent with statute and/or Department policy; however, the Department did not always complete and/or properly document other key investigative activities

Department coordinated or attempted to coordinate with law enforcement agencies and involved OCWI staff in most criminal child abuse and neglect report investigations we reviewed, in accordance with statute and/or Department policy

Our analysis of Department 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 7,925 of 8,335 (95%) criminal reports the Department received from July 1, 2024 through December 1, 2025.^{1,2}

Additionally, our review of a stratified random sample of 15 of 8,335 reports of criminal child abuse or neglect (criminal reports) that the Department received from July 1, 2024 through December 1, 2025, found that the Department met 2 key statutory and/or Department policy requirements for investigating criminal reports, including a requirement for coordination that recommended practices suggest helps avoid compromising the criminal case or the Department's child safety assessment.^{3,4}

¹ As discussed in the Introduction, pages 5 through 6, Department policy requires Department staff to assign criminal reports of child abuse or neglect a priority level based on the severity of the criminal child abuse or neglect allegation, which range from 2 to 48 hours for criminal reports of child abuse and neglect.

² For the reports that were untimely, the Department's initial contact/attempted contact with the alleged child victim was between 3 minutes to approximately 44 days past the required response time frame.

³ We reviewed a stratified random sample of 15 criminal reports including 6 criminal reports from counties with a population under 100,000; 3 criminal reports from counties with a population over 100,000, excluding Maricopa and Pima Counties; 3 criminal reports from Pima County; and 3 criminal reports from Maricopa County.

⁴ According to A.R.S. §8-471(E)(2), OCWI must assess, respond to, or investigate all criminal conduct allegations, which shall be a priority. Prior to conducting interviews with the family, Department policy requires investigators to contact the law enforcement agency where the incident occurred to coordinate investigative efforts and interviews.

Specifically:

- ▶ For 13 of 15 criminal reports we reviewed, Department investigators coordinated or attempted to coordinate with law enforcement agencies prior to making or attempting to make contact with the alleged child victim(s) and/or perpetrator(s), consistent with its policies and procedures.^{5,6}
- ▶ For 14 of 15 criminal reports we reviewed, the Department involved an OCWI investigator in the criminal report investigation, consistent with statute and Department policy.^{7,8,9}

Department reported it withheld specific allegations from individuals under investigation because providing the specific allegations could compromise the criminal investigation, but its case-management system lacked any information explaining its reasoning for doing so for most reports we reviewed

Statute and Department policy require the Department to provide individuals under investigation with the specific allegations against them in writing. However, the Department is not required to provide the parent, guardian, or custodian with details or information that would compromise an ongoing criminal investigation.^{10,11} Our review found that Department investigators did not provide individuals under investigation with the specific allegations against them in writing in 11 of 13 criminal reports we reviewed that should have included a Notice of Duty to Inform or document in the Department's case-management system the reason(s) why the specific allegations were

⁵ For the remaining 2 reports we reviewed, the Department lacked documentation of the required coordination. For the first criminal report, the Department reported that the investigator responded jointly with law enforcement to the residence of the alleged perpetrator. However, the Department's case-management system lacked any information about the joint response, and the Department provided no evidence that the investigator coordinated or attempted to coordinate with law enforcement prior to making contact with the alleged child victim, which occurred prior to interviewing the alleged perpetrator. For the second criminal report, the Department reported that although the investigator may have attempted to make contact with a law enforcement agency, the investigator did not document the attempt.

⁶ According to CWLA, recommended practices suggest that child protective agencies, such as the Department, should initiate contact with law enforcement before the first contact with the family to help avoid compromising the criminal case or the child protective agency's child safety assessment.

⁷ As discussed in the Introduction, pages 3 through 4, OCWI investigators are required to be involved in all investigations of criminal reports by either assessing, responding to, or investigating the criminal report.

⁸ For the remaining criminal report we reviewed, the Department reported that it was a report assigned to a local field investigator for investigation that was not identified as criminal by the hotline. Additionally, the OCWI joint investigative liaisons responsible for assessing criminal reports that are assigned to a local field office were unaware this report was later determined to be a criminal report and required an assessment. The Department further reported that this report was identified as being a criminal report during a quality assurance check, and the criminal tracker was added to the report later the same day the report was received. Although the Department did not involve an OCWI investigator in the criminal report investigation, the local field investigator investigated this as a criminal report and coordinated or attempted to coordinate with law enforcement prior to making or attempting to make contact with the alleged child victim(s) and/or perpetrator(s).

⁹ OCWI is a specialized unit in the Department that investigates criminal child abuse and neglect reports in Maricopa, Pima, and Pinal Counties. See Introduction, pages 3 through 4, for OCWI's responsibilities within the Department.

¹⁰ 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. Additionally, although A.R.S. §8-471(E)(8) states that the Department is not required to provide the parent, guardian, or custodian with details or information that would compromise an ongoing criminal investigation, it does not specifically exempt the Department from the requirement to provide specific allegations in writing if doing so would not compromise an ongoing criminal investigation.

¹¹ As discussed in the Introduction, page 8, Department policy requires the investigator to provide individuals under investigation with a Notice of Duty to Inform, which is an acknowledgement of receipt of the notice of their rights, and investigators are required to document the Notice of Duty to Inform in the Department's case-management system.

not provided.^{12,13} The Department reported that it did not provide specific allegations for these 11 reports because doing so could compromise law enforcement's investigation. We found information in the Department's case-management system indicating that law enforcement asked the investigator not to provide specific details on the allegations for 1 of 11 criminal reports. For the remaining 10 of 11 criminal reports, the Department's case-management system lacked details explaining why the investigator did not provide specific allegations to the individuals under investigation, such as a request from law enforcement to withhold certain details or information indicating that the investigator was unable to discuss with law enforcement personnel any possible impacts related to sharing specific allegations on law enforcement's ongoing criminal investigation.

Specifically:

- ▶ For 1 criminal report, although the Department's case-management system includes information that law enforcement indicated to the investigator in this report that there were no issues that the investigator needed to avoid discussing with the family, the Department investigator provided vague allegation information such as physical abuse or neglect and did not document why they did so.
- ▶ For the remaining 9 criminal reports, the Department's case-management system lacked any documentation or information explaining why providing a specific allegation to the individual under investigation could compromise law enforcement's ongoing criminal investigation.

As of June 2026, the Department lacked written guidance for investigators outlining requirements and processes for making and documenting determinations to not provide an individual under investigation with the specific allegation against them in writing because doing so would compromise a criminal investigation. Instead, Department policy states only that an investigator may withhold details that would compromise an ongoing criminal investigation. This lack of specific guidance likely contributed to the issues we identified.

Similar to our prior findings for the Department's noncriminal investigations, Department investigators did not always timely complete and/or properly document other key investigative activities and notifications in accordance with statutory and/or policy requirements for criminal reports we reviewed

Our review of a stratified random sample of 15 of 8,335 criminal reports the Department received from July 1, 2024 through December 1, 2025, found the Department did not always timely complete and/or properly document some key investigative activities and notifications (see Appendix A, pages a-1 through a-4, for summary information about the Department's completion of statutory and/or policy requirements we reviewed for our review of the 15 criminal reports).¹⁴

¹² For 2 of 15 criminal 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 to provide a Notice of Duty to Inform to the individuals under investigations.

¹³ For the remaining 2 of 13 criminal reports we reviewed, in the first, the Department provided the individuals under investigation with the specific allegations against them in writing, and in the second, the Department did not document the Notice of Duty to Inform in its case-management system (see page 30 for more information on the Department's lack of documenting a Notice of Duty to Inform).

¹⁴ See footnote 3, page 27, for more information about our sample of criminal reports.

These findings were similar to our prior findings for the Department's noncriminal investigations (see Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*).

Specifically, Department investigators:

► **Did not always complete and/or properly document key investigative steps, including steps intended to protect children and obtain sufficient evidence to determine whether or not to substantiate an allegation as required by its policy**

Department investigators did not always complete and document various assessments, plans, or steps generally intended to protect children during the investigation process and to obtain sufficient evidence to determine whether to substantiate an allegation of criminal child abuse or neglect for some criminal reports we reviewed as follows (see Introduction, pages 4 through 10, for more information about Department policy requirements):

- For 2 of 14 criminal reports we reviewed where the Department investigator completed a Family Functioning Assessment, the Family Functioning Assessments were missing or contained incomplete information on key items, such as not including a child listed as a child victim in the criminal report in the Family Functioning Assessment or obtaining information regarding a child's sleeping arrangements for a child under the age of 1.¹⁵
- For 6 of 13 criminal reports we reviewed where notifications informing individuals under criminal investigation of investigation outcomes should have been made, Department investigators did not provide investigation finding notices to all alleged perpetrators. In response to our special audit, the Department reported it sent a notice to alleged perpetrators for 3 of the 6 criminal reports for which it lacked a documented notice.¹⁶
- For 2 of 13 criminal reports that should have included a Notice of Duty to Inform, the Department did not document a Notice of Duty to Inform in its case-management system, as required by Department policy.¹⁷

¹⁵ For 1 of 15 criminal reports we reviewed, the Department was unable to locate the family. Pursuant to AAC R21-4-103, the Department is not required to take all investigative actions if the alleged child victim or the child victim's family cannot be located, and as a result, the Department reported that a Family Functioning Assessment was not applicable in this case.

¹⁶ As discussed in the Introduction, page 10, the investigation finding notice is provided to the individual(s) who was under investigation after the investigation is closed. This notice is different from the Notice of Duty to Inform provided to the individual under investigation during the investigation.

¹⁷ The Department investigators did not document the Notice of Duty to Inform in the Department's case-management system for all alleged perpetrators as required by Department policy, despite information in the Department's case-management system indicating that the investigators provided and read the Notice of Duty to Inform to the alleged perpetrators.

► **Did not always timely complete investigation findings and a key assessment or close investigations within time frames required by statute and/or its policy**

The Department did not timely complete investigation findings and Family Functioning Assessments or close investigations within time frames required by statute and/or its policy for most of the 15 criminal reports we reviewed (see Appendix A, Table 3, pages a-2 through a-4, for more information on the 15 reports we reviewed).

Specifically, Department investigators:

- Did not complete 9 required Family Functioning Assessments within 45 days, contrary to Department policy, instead taking between 61 and 258 days to complete.¹⁸
- Did not enter 10 investigation findings into its case-management system within 45 days, contrary to statute, instead taking between 60 and 259 days to complete.¹⁹
- Did not close 10 investigations within 60 days, contrary to Department policy, instead taking between 61 and 261 days to complete.²⁰

The requirements and processes for the issues we identified with the Department's timely completion and/or proper documentation of key investigative activities and notifications are consistent for both criminal and noncriminal reports. As discussed in our September 2025 special audit on the Department's investigations of noncriminal reports of child abuse and neglect, the Child Welfare League of America identified various impacts of these issues in noncriminal reports, including that failure to complete or document key assessments, plans, and investigatory steps could negatively impact the Department's ability to ensure child welfare, impede subsequent investigations, and increase the risk that key investigatory information will be lost, and 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.²¹ Additionally, our September 2025 special audit included recommendations to address Department noncompliance with these requirements that it should implement consistently across both criminal and noncriminal investigations. As a result, rather than making new recommendations to address the deficiencies with criminal investigations we identified above, we will conduct work to assess the Department's correction of these issues for both noncriminal and criminal reports during subsequent followups on our September 2025 special audit. See our initial followup of special audit report 25-109 for the status of the Department's implementation of those recommendations as of September 2026.²²

¹⁸ Department policy requires the Family Functioning Assessment to be completed within 45 days as the documented determination of the safety of children whose families are subject to investigation.

¹⁹ A.R.S. §8-456 requires Department investigators to enter investigation findings into its case-management information system within 45 days after receiving a criminal report.

²⁰ Department policy requires investigators to "make efforts" to close noncriminal investigations within 60 days, and the Department reviews whether criminal investigations were or were not closed within 60 days to assess compliance with this policy requirement.

²¹ For additional information on the impact of failing to complete or document key investigation steps, see Finding 2, pages 24 through 26, of Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*. For additional information on the impact of delayed investigations, see Finding 3, pages 32 through 33, of Arizona Auditor General report 25-109 *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports*.

²² *Arizona Department of Child Safety—Investigations of Noncriminal Child Abuse and Neglect Reports, Initial Followup*.

Recommendation to the Department

5. Develop and implement written guidance outlining requirements and processes for making and documenting in its case-management system determinations to not provide an individual under criminal investigation with the specific allegation(s) against them in writing because doing so could compromise a criminal investigation.

Department response: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendation.

The Arizona Auditor General makes 5 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

CHAPTER 1	16
1. Contact the 7 county attorney’s offices that had updated joint investigation protocols that were not posted to the Department’s website as of May 2026 to request the most up-to-date joint investigation protocols for the county and post the counties’ updated county joint investigation protocols on its website accordingly.	21
2. Develop and implement written policies, procedures, and/or guidance including staff roles and responsibilities for periodically reviewing each county’s joint investigation protocol sections related to the Department to identify and communicate needed changes to county attorney’s offices; working with county attorney’s offices when requested to update joint investigation protocols; periodically contacting county attorney’s offices to request the most up-to-date joint investigation protocols for the county; and posting updated joint investigation protocols on its website after receiving them.	21
3. After establishing its written policies, procedures, and/or guidance, inform each county attorney’s office of the Department staff and/or position title responsible for working with the county attorney’s office when the county attorney’s office updates its joint investigation protocols.	21
CHAPTER 2	22
4. Identify and implement outreach activities aimed at further strengthening coordination with law enforcement agencies on joint investigations of criminal child abuse and neglect, such as developing and/or updating educational information or materials that can be provided to law enforcement agencies regarding the Department’s joint investigation roles and responsibilities; soliciting input from law enforcement agencies on areas for improved collaboration; conducting cross-training events on specific topics of interest and/or with specific law enforcement agencies based on input it receives; and identifying opportunities for further in-person interactions between Department investigators and law enforcement personnel who work on joint investigations.	26

5. Develop and implement written guidance outlining requirements and processes for making and documenting in its case-management system determinations to not provide an individual under criminal investigation with the specific allegation(s) against them in writing because doing so could compromise a criminal investigation.

Summary information about our review of 15 sampled criminal reports

Table 3, which follows (see pages a-2 through a-4), presents the results of our review of a stratified random sample of 15 of 8,335 criminal reports of child abuse or neglect the Department received from July 1, 2024 through December 1, 2025 (see Appendix B, pages b-1 through b-2, for more information on our sample). Specifically, in conducting our review of those criminal 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 coordinating with law enforcement prior to making or attempting to make initial contact with alleged child victims; providing the Notice of Duty to Inform to individuals under investigation to notify them of their statutory rights and specific allegations made against them, or documenting the reason(s) why the specific allegations were not provided; completing a Family Functioning Assessment within 45 days that included all required Department policy elements to make a determination of the child's safety; and closing investigations within 60 days (see Chapter 3, pages 27 through 32, for more information about our review of the sampled criminal reports and Department investigator compliance with statutory and/or Department policy requirements).

Table 3

Department took between 2 and 261 days to complete investigation findings and a key assessment or close investigations for 15 criminal reports we reviewed

Sampled criminal report	Days to:			Completion/compliance status of:					
	Close ¹	Complete FFA ²	Enter finding ³	Coordinated with law enforcement prior to family contact	Involved OCWI	Notice of Duty to Inform ⁴	Interviews ⁵	Assessments and plans	Finding notice ⁶
1	61	22	60	✓	✓	⚠	✓	✓	✓
2	144	128	130	✗	✓	N/A	N/A	✓	N/A
3	261	258	259	✓	✓	⚠	✓	✓	⚠ ⁷
4	78	61	69	✓	✓	⚠	✓	✓	✓
5	157	126	157	✗	✓	⚠	✓	⚠	⚠ ⁷
6	100	68	100	✓	✓	⚠	✓	✓	✓
7	17	12	16	✓	✓	⚠	✓	✓	⚠ ⁷
8	135	133	135	✓	✓	⚠	✓	⚠	⚠
9	5	2	2	✓	✗	✓	✓	✓	✓

Completion/compliance status

 Completed and compliant
  Completed but not compliant
  Not completed/ no evidence of completion
  Not applicable

Table 3 continued

Sampled criminal report	Days to:			Completion/compliance status of:					
	Close ¹	Complete FFA ²	Enter finding ³	Coordinated with law enforcement prior to family contact	Involved OCWI	Notice of Duty to Inform ⁴	Interviews ⁵	Assessments and plans	Finding notice ⁶
10	212	210	211	✓	✓	⚠	✓	✓	✓
11	257	253	256	✓	✓	⚠	✓	✓	⚠
12	27	25	26	✓	✓	⚠	✓	⚠	⚠
13	62	62	62	✓	✓	⚠	✓	✓	✓
14	9	N/A ⁸	9	✓	✓	N/A	N/A	N/A	N/A
15	32	30	31	✓	✓	✓	✓	✓	✓
Status	Count of criminal reports by completion/compliance status								
✓	5	5	5	13	14	2	13	11	7
⚠	10	9	10	0	0	11	0	3	6
✗	0	0	0	2	1	0	0	0	0
N/A	0	1	0	0	0	2	2	1	2

Completion/compliance status

✓	Completed and compliant	⚠	Completed but not compliant	✗	Not completed/ no evidence of completion	N/A	Not applicable
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Table 3 continued

- ¹ 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.
- ² As discussed in the Introduction, pages 8 through 9, the Department's policy requires investigators to complete a Family Functioning Assessment (FFA) within 45 days of the criminal report being assigned. As such, FFAs completed within 45 days are completed and compliant, and FFAs that were completed after 45 days are completed but not compliant.
- ³ As discussed in the Introduction, page 9, statute and the Department's policy require investigators to enter their written investigation findings into the Department's case-management system within 45 days after receipt of the criminal 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.
- ⁴ A Notice of Duty to Inform was not applicable (N/A) if the Department was unable to locate or contact the alleged perpetrator or the alleged perpetrator refused engagement with the Department. A Notice of Duty to Inform was completed but not compliant if the Department did not upload a copy of the Notice of Duty to Inform in its case-management system or did not document in its case-management system the reason(s) why the specific allegations were not provided.
- ⁵ An interview was not applicable (N/A) if the Department was unable to contact the family or if the alleged perpetrator and/or alleged child victim refused to be interviewed.
- ⁶ An investigation finding notice was not applicable (N/A) if the Department was unable to contact the alleged perpetrator and did not have an address to send the notice to.
- ⁷ In response to our special audit, the Department reported that it sent a notice to alleged perpetrators for 3 of the 6 criminal reports for which it lacked a documented notice.
- ⁸ For 1 of 15 criminal reports we reviewed, the Department was unable to locate the family. Pursuant to AAC R21-4-103, the Department is not required to take all investigative actions if the alleged child victim or the child victim's family cannot be located, and as a result, the Department reported that a Family Functioning Assessment was not applicable in this case.

Source: Auditor General staff review of Department policy, investigative documents in the Department's case-management system, and Department-provided information for a sample of 15 of 8,335 criminal reports the Department received from July 1, 2024 through December 1, 2025.

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 statutes; the Department's website; Department policies, procedures, and guidance for investigating criminal child abuse and neglect reports; and interviewing Department staff.

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

- ▶ To obtain information for Chapter 1, we:
 - Spoke with all 15 county attorney's offices about their county's joint investigation protocol for investigations of allegations involving criminal child abuse and neglect.
 - Reviewed the joint investigation protocols for all 15 counties as of May 2026.
- ▶ To obtain information for Chapter 2, we conducted structured interviews with 9 law enforcement agencies across Arizona between January 2026 and April 2026.¹
- ▶ To obtain information for Chapter 3 and determine whether the Department investigated criminal child abuse and neglect reports it received between July 1, 2024 and December 1, 2025, as required by statute and Department policy and suggested by recommended practices, we reviewed:
 - The Department's case-management system and data as of January 2026 and Department-provided information for a stratified random sample of 15 of 8,335 criminal reports that the Department received between July 1, 2024 and December 1, 2025.² Our sample of 15 of 8,335 reports consisted of:
 - ▷ 6 reports randomly sampled from all counties with a population under 100,000.³
 - ▷ 3 reports randomly sampled from all counties with a population over 100,000 excluding Maricopa and Pima Counties.
 - ▷ 3 reports randomly sampled from Pima County.
 - ▷ 3 reports randomly sampled from Maricopa County.

¹ We conducted interviews with 9 different law enforcement agencies judgmentally selected from Apache, Maricopa, Mohave, Navajo, Pima, Santa Cruz, Yavapai, and Yuma Counties based on risk and geographical representation of Arizona.

² We reviewed investigatory case notes in the Department's case-management system, including case notes about interviews and contact with the alleged child victims, alleged perpetrators, other individuals residing in the home, the reporting source, and law enforcement. Additionally, as applicable, we also reviewed assessments of whether children were in imminent danger, allegations, and findings.

³ We allocated a larger sample size to the smallest populous counties to account for the greater risk of these areas being outside of OCWI offices in Maricopa, Pima, and Pinal Counties (see page 4 for more information about the location of OCWI).

- Child Welfare League of America (CWLA)-provided information on child welfare investigation research and recommended practices.⁴
- ▶ To obtain information for Appendix A, we reviewed documentation in the Department's case-management system and Department-provided responses for a stratified random sample of 15 of 8,335 criminal reports of child abuse or neglect the Department received between July 1, 2024 and December 1, 2025.
- ▶ To obtain information for the Introduction, we reviewed Department-provided data regarding investigative staffing and vacancies, session laws, the Department's April 2026 *Monthly Operational and Outcome Report*, and Department case-management system data for criminal child abuse and neglect reports it received between July 1, 2024 and December 1, 2025.⁵
- ▶ 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.

Our work on internal controls included, where applicable, reviewing the Department's policies and procedures and statute, and testing Department compliance with these requirements. We reported our conclusions on applicable internal controls in Chapter 3.

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.

⁴ 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 practices.

⁵ We analyzed data from the Department's case-management system that was both provided by the Department and that we extracted using queries developed with Department staff assistance.

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 the recommendations resulting from the audit conducted by the Arizona Auditor General.

September 9, 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 Criminal Conduct*.

Dear Auditor General Perry:

The Arizona Department of Child Safety (Department) acknowledges the audit of its processes for initiating and conducting investigations of child abuse and neglect reports involving allegations of criminal conduct.

The Department is committed to continuing elements of effective coordination with law enforcement agencies and collaborating with county attorney's offices.

The report affirms the Department's ongoing focus on timely, consistent, and accountable practice. It further recognizes that the Department met key criminal joint investigation requirements, 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:

KATHRYN PTAK

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Kathryn Ptak
Director

Enclosure: DCS Recommendation Response

Chapter 1: Seven county attorney's offices had not updated criminal child abuse and neglect joint investigation protocols for more than 5 years risking unresponsiveness to changes in legislation, resources, or child welfare investigation practices and Department had outdated protocols on its website for 7 of 15 counties potentially hindering public understanding and transparency of investigation processes and responsibilities.

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

Response explanation: Under A.R.S. § 8-817, each county attorney's office is responsible for developing, adopting, and implementing its joint investigation protocols. The Department agrees that several counties have not updated their protocols in more than five years and acknowledges that some of the protocols posted on the Department's website are outdated. Although the Department is not required to maintain or publish the protocols, it recognizes the importance of ensuring staff have access to current guidance. Consistent with its statutory role, the Department has begun efforts to obtain the most up-to-date protocols directly from county attorney's offices and will make these materials available to staff through internal channels, rather than continuing to rely on website posting. This approach supports accurate staff access to relevant protocols.

Recommendation 1: Contact the 7 county attorney's offices that had updated joint investigation protocols that were not posted to the Department's website as of May 2026 to request the most up-to-date joint investigation protocols for the county and post the counties' updated county joint investigation protocols on its website accordingly.

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

Response explanation: The Department has contacted the county attorney's offices to request the most current versions of their joint investigation protocols and will ensure these updated protocols are made available to Department staff once received. As the Department is not required to post the protocols on its website, the Department will not continue maintaining these on its public website. This approach aligns with the statutory role of county attorneys as owners of the protocols and ensures the Department fulfills its duties.

Recommendation 2: Develop and implement written policies, procedures, and/or guidance including staff roles and responsibilities for periodically reviewing each county's joint investigation protocol sections related to the Department to identify and communicate needed changes to county attorney's offices; working with county attorney's offices when requested to update joint investigation protocols; periodically contacting county attorney's offices to request the most up-to-date joint investigation protocols for the county; and posting updated joint investigation protocols on its website after receiving them.

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

Response explanation: The Department will conduct annual outreach to each county attorney's office to request the most current version of the joint investigation protocol and make these protocols available to Department's staff. This annual outreach process will

ensure continued access to up to date protocols without creating obligations that extend beyond the Department's statutory role. As the Department is not required to post the protocols on its website, the Department will not continue maintaining these on its public website and will instead rely on direct communication and document sharing with counties to keep staff informed.

Recommendation 3: After establishing its written policies, procedures, and/or guidance, inform each county attorney's office of the Department staff and/or position title responsible for working with the county attorney's office when the county attorney's office updates its joint investigation protocols.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will inform county attorney's offices of the Department staff responsible for working with their office when the county attorney's office updates its joint investigation protocols.

Chapter 2: Law enforcement agencies reported elements of effective coordination and opportunities for strengthening coordination with the Department during joint investigations of child abuse and neglect, including through cross-training.

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

Response explanation: The Department will meet with a select group of law enforcement agencies with whom it most frequently conducts joint investigations to review the specific coordination topics identified in the audit. This targeted outreach approach ensures responsiveness to law enforcement input while recognizing the strengths of current practices that are functioning well.

Recommendation 4: Identify and implement outreach activities aimed at further strengthening coordination with law enforcement agencies on joint investigations of criminal child abuse and neglect, such as developing and/or updating educational information or materials that can be provided to law enforcement agencies regarding the Department's joint investigation roles and responsibilities; soliciting input from law enforcement agencies on areas for improved collaboration; conducting cross-training events on specific topics of interest and/or with specific law enforcement agencies based on input it receives; and identifying opportunities for further in-person interactions between Department investigators and law enforcement personnel who work on joint investigations.

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

Response explanation: The Department will identify a select group of law enforcement agencies with whom it most frequently conducts joint investigations and request meetings to discuss the issues highlighted in the recommendation. If those discussions determine that the identified issues do not exist with these agencies, the Department will continue its current collaborative practices, relying on the established forums already in place, such as multidisciplinary meetings, to support ongoing coordination. Given this

approach, and the continuation of effective collaboration where concerns are not present, the Department will consider this recommendation implemented.

Chapter 3: Department met 2 key criminal joint investigation requirements for most criminal child abuse and neglect reports we reviewed, consistent with statute and/or Department policy; however, the Department did not always complete and/or properly document other key investigative activities.

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

Response explanation: Because the review sample consisted of 15 investigations out of 8,335 criminal conduct investigations (approximately 0.17 percent of investigations during the period) the limited sample makes it challenging for the Department to gauge the broader impact of the identified issues across statewide practice. The Department acknowledges the importance of completing and properly documenting all key investigative activities and remains committed to reinforcing proper documentation practices and ensuring that all investigative requirements are met.

Recommendation 5: Develop and implement written guidance outlining requirements and processes for making and documenting in its case-management system determinations to not provide an individual under criminal investigation with the specific allegation(s) against them in writing because doing so could compromise a criminal investigation.

Department response: The audit recommendation will be implemented.

Response explanation: The Department will implement this recommendation as part of a holistic update to the Notice of Duty to Inform, including recommendations from the non-criminal conduct audit.