

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unresponsiveness to changes in legislation, resources, or child welfare investigation practices and Department had outdated protocols on its website for 7 of 15 counties potentially hindering public understanding and transparency of investigation processes and responsibilities.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protocols in more than five years and acknowledges that some of the protocols posted on the Department's website are outdated.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.