



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

Janice K. Brewer
Governor

Clarence H. Carter
Director

MAR 28 2012

Ms. Debbie Davenport
Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018

Dear Ms. Davenport:

The Arizona Department of Economic Security wishes to thank the Office of the Auditor General for the opportunity to provide a response to the revised preliminary report draft of the performance audit of the Division of Children, Youth and Families, Child Protective Services, In-Home Services Program.

We appreciate the Auditor General's recognition of the Department's efforts to include evidence-based practice requirements for in-home service providers. The Department also appreciates the Auditor General's acknowledgement of the performance related contractual requirements that have been initiated by the Department to promote accountability and improved outcomes.

The Department does not have any questions or issues related to the audit findings; therefore, a discussion on the revised preliminary report will not be necessary.

Please find the enclosed response to the audit findings and recommendations. If you have any questions, please contact Veronica Bossack, Assistant Director, Division of Children, Youth and Families at (602) 542-6008 or me at (602) 542-5757.

Sincerely,

Clarence H. Carter
Director

Enclosure

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY'S PRELIMINARY
RESPONSE TO THE OFFICE OF THE AUDITOR GENERAL'S REPORT ON IN-
HOME SERVICES**

The Department's response to the Auditor General's recommendations is described below:

RECOMMENDATION 1.1:

The Division should require the use of evidence-based practices in the next contract solicitation for in-home services.

DES Response:

The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

The Division recognizes the benefit of evidence-based practices and, as referenced in this report, included their optional use by providers in the contracts that should become effective in calendar year 2012. In addition, the 2012 contractual agreements require that competency training sessions be delivered to provider staff which shall include a session on evidence-based or informed practices. However, consideration must be given to rural communities that may not have access to providers who can meet the evidence-based requirement. For service delivery in non-urban areas, evidence-based practices should be considered a preference, rather than a mandate, in order to ensure that accessible and individualized services remain available for this population.

The Division will also require the authority to assign substitute performance or practice contract requirements in the absence of evidence-based interventions related to specific child welfare services or populations.

RECOMMENDATION 1.2:

In the meantime, the Division should communicate its intent to its stakeholders, including existing and potential contractors, for requiring the use of evidence-based practices to allow time for existing and potential contractors to develop or expand their capacity to provide evidence-based in-home services.

DES Response:

The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

To ensure the continued provision of in-home services to populations residing in the rural areas of the state, the communication to the contractors will note the preference, rather than requirement, for evidence-based practices for non-urban areas.

The notification will also include verbiage noting that performance related measures may be substituted for child welfare interventions that lack evidence-based practice or treatment protocols that do not serve a specific population.

RECOMMENDATION 1.3:

The Division should use the time until the next contract solicitation for in-home services to:

- a. Develop its in-house expertise in order that it may effectively support contractors' implementation of evidence-based in-home services,
- b. Develop and make available through the Department's Web site well-defined, written criteria for identifying evidence-based practices, and
- c. Maintain and make available through the Department's Web site an updated inventory of evidence-based practices.

DES Response:

The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

The Division agrees with the findings and recommendations and will implement them as outlined prior to the next contract solicitation for in-home services. In order to efficiently and effectively utilize limited staffing resources, the Division will maintain the inventory of evidence-based practices on its Web site by identifying acceptable model repositories that providers may draw from (e.g., those contained within the California Evidence-based Clearinghouse for Child Welfare, the National Registry of Evidence-based Programs and Practices, etc.). This would eliminate the need for a full time dedicated resource, yet provide consistency and direction to contractors.

RECOMMENDATION 1.4:

The Division should expand its monitoring of in-home service contractors to:

- a. Ensure the contractors are implementing evidence-based practices as designed, and
- b. Ensure that contractors have procedures to correct deviations from evidence-based practices design.

DES Response:

The finding of the Auditor General is agreed to and the audit recommendations will be implemented.

A process has been developed, and will be piloted, to assess the provider's fidelity to evidence-based practices. An assessment of the pilot will allow for enhancements or procedural adjustments prior to the next contract solicitation.

RECOMMENDATION 1.5:

The Division should require contractors modifying evidence-based practices to provide written justification for the modifications to verify that essential components are not being modified without approval of the developer(s).

DES Response:

The finding of the Auditor General is agreed to and the audit recommendations will be implemented.

The Department will include this requirement in the next in-home services contract solicitation.