



**ARIZONA**  
DEPARTMENT  
*of* CHILD SAFETY

David Lujan, Cabinet Executive Officer/Executive Deputy Director  
Katie Hobbs, Governor

July 11, 2024

Lindsey Perry, CPA, CFE  
Auditor General  
Arizona Office of the Auditor General  
2910 North 44th Street, Suite 410  
Phoenix, Arizona 85018

RE: Auditor General's report, *Special audit—Department of Child Safety, Young Adult Program*

Dear Ms. Perry:

The Arizona Department of Child Safety (Department) has reviewed the Auditor General's report, *Special audit—Department of Child Safety, Young Adult Program*. The Department recognizes the transition to adulthood is a critical period of a youth's development and is committed to implement additional strategies and improvements in response to the audit recommendations. The responses to the findings and recommendations are enclosed.

The Department appreciates the diligence and collaboration of the Office of Auditor General staff during the audit process.

Sincerely,

David Lujan  
Cabinet Executive Officer/Executive Deputy Director

Enclosure: DCS Recommendation Response

**Chapter 1:** Department has implemented or is implementing several EFC success coaching program requirements and should make some process improvements to help ensure program success

**Recommendation 1:** The Department should develop and implement a written program implementation plan for the EFC success coaching program to ensure the Department meets its goals for referring all eligible youth in EFC to the EFC success coaching program and that contractors hire an adequate number of coaches to provide services, including establishing steps to meet its goals and facilitate program implementation, specifying staff roles and responsibilities for implementing the steps, identifying timelines for when steps will be initiated and completed, and revising the plan, as needed.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: As implementation of EFC success coaching program continues, the Department agrees to develop and implement a written program implementation plan to ensure its goals for referring all eligible youth in EFC to the EFC success coaching program and that contractors hire an adequate number of coaches to provide services are met. The Department will establish steps, timelines as well as roles and responsibilities to meet its goals and facilitate program implementation. The plan will be reviewed and revised, as needed

**Recommendation 2:** The Department should further revise and/or develop and implement written procedures for overseeing and monitoring the success coaching contractors to ensure they meet contractual and EFC success coaching program requirements, including procedures for ensuring success coaches report accurate and consistent information and do not engage with youth prior to completing required training.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees with the importance of overseeing and monitoring the success coaching contractors. The Department will revise its contract monitoring procedures specific to the EFC success coaching program to ensure contractual and EFC program requirements are met. The procedures will also include requirements for periodic assessment and revision of guidance and the monitoring tool, as necessary. The procedures will include guidance for ensuring success coaches report accurate and consistent information and do not engage with youth prior to completing required training.

**Recommendation 3:** The Department should establish and implement a process to periodically evaluate the written procedures and/or guidance for overseeing and monitoring success coaching contractors and revise them as needed.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department strives to ensure program fidelity and will operationalize a periodic evaluation of written procedures for overseeing and monitoring success coaching contractors. Procedures will be revised, as necessary.

**Recommendation 4:** The Department should work with ASU to establish the expectations for its evaluation of the EFC success coaching program and amend the contract to reflect these expectations, as necessary.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department understands the expectations for the evaluation of the EFC success coaching program is imperative. The Department agrees to continue to work with ASU to establish the expectations for its evaluation and amend the contract, as needed.

**Recommendation 5:** The Department should develop and implement a written plan to monitor ASU's EFC success coaching program evaluation contract, including assigning staff responsibility for monitoring contract requirements, verifying ASU has met expectations, and time frames for doing so.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department understands the need to monitor ASU's EFC success coaching program evaluation contract and agrees to develop and implement a written plan to include steps to monitor and verify ASU has met contract requirements/expectation, timeframes and staff responsible.

**Recommendation 6:** The Department should update and implement written guidance to ensure the quality review committee follows applicable requirements of Laws 2023, Ch. 141, including confirming youth meet eligibility requirements and that youth have a case and transition plan that supports the youth's identified goals.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to revise the DCS 12-04 – Extended Foster Care Quality Review policy and procedures to ensure compliance with Laws 2023, Ch. 141 to include confirming youth meet eligibility requirements and that youth have a case and transition plan that supports the youth's identified goals.

**Recommendation 7:** The Department should request information from the EFC quality review committee and the chair of Joint Legislative Budget Committee to update performance measures in required quarterly reports.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Although not required in Laws 2023, Ch. 141, the Department will attempt to solicit feedback from the EFC quality review committee and the chair of Joint Legislative Budget Committee to determine if performance measures in required quarterly reports should be updated.

**Recommendation 8:** The Department should adopt rules to implement Laws 2023, Ch. 141.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: As reported, the Department will initiate the rulemaking process by January 2025 and adopt the rules to implement Laws 2023, Ch. 141.

**Chapter 2:** Department has not consistently developed youth transition plans as required by federal law and Department policy, which may impact youths' successful transition to adulthood

**Recommendation 9:** The Department should develop transition plans for each youth in its care starting at age 14 and finalize transition plans for these youth during the 90 days before they turn 18 years old, or 21 years old for youth in extended foster care, as required by federal law and Department policy. Youths' transition plans should include specific long-term goals for successfully transitioning to adulthood and identify short-term steps with measurable completion time frames and relevant resources to help the youth achieve their long-term goals, consistent with the plans' purpose, Department guidance, and recommended practices.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department understands the need to develop transition plans for each youth in its care starting at age 14 and finalize transition plans for these youth during the 90 days before they turn 18 years old, or 21 years old for youth in extended foster care, as required by federal law and Department policy. The Department will take steps to ensure comprehensive transition plans are completed that include long-term and timely goals for youth, as required.

**Recommendation 10:** The Department should develop and implement a written action plan that outlines key steps it will take to help ensure that its staff develop transition plans for youth in its care as required by federal law and Department policy, including associated completion deadlines for each step. Its written action plan should include steps and deadlines for:

**Recommendation 10a:** Reviewing its transition planning policies, procedures, and guidance to identify and implement needed revisions to its transition planning processes.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to develop and implement a written action plan that outlines key steps it will take to help ensure that its staff develop transition plans for youth in its care. The written action plan will include steps and deadlines for reviewing its transition planning policies, procedures, and guidance to identify and implement needed revisions to its transition planning processes, as necessary. The written plan will include steps for communicating policy and procedure revisions to caseworkers and supervisors as well as communicating ongoing transition planning reminders to staff.

**Recommendation 10b:** Developing and implementing additional training for caseworkers and their supervisors on transition planning.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to develop and implement a written action plan that outlines key steps it will take to help ensure that its staff develop transition plans for youth in its care. The written action plan will include steps for developing and implementing additional training for caseworkers and their supervisors on transition planning, as necessary. The written action plan will include steps for utilizing the recently developed Guide to Transitioning Planning for Young People (ages 14-21).

**Recommendation 10c:** Leveraging and/or expanding the use of its existing resources to help improve its transition planning processes, such as assigning Department staff with expertise in transition planning to help train and coach its caseworkers and supervisors on developing transition plans and/or to review and revise its transition-planning policies, procedures, and guidance.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: As existing resources have been identified to improve its transition planning processes, the Department will utilize staff to assist with training and coaching caseworkers and supervisors on developing transition plans. The Department will determine if it is necessary to review and revise its transition-planning policies, procedures and guidance.

**Recommendation 10d:** Developing and implementing a quality assurance process for monitoring the completion of comprehensive transition plans that are consistent with federal requirements and recommended practices, including ensuring that transition plans include specific long-term goals and identify short-term steps with measurable completion time frames and relevant resources for achieving those goals

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to develop and implement a quality assurance process for monitoring the completion of comprehensive transition plans. This process will ensure compliance with federal requirements and recommended practices including specific long-term goals and identification of short-term steps with measurable completion time frames and relevant resources for achieving those goals. The Department will develop a Transition Plan Dashboard in Guardian to identify completed and missing elements of the transition plans.

**Recommendation 10e:** Developing and implementing a process to track completion of transition plans for all applicable youth in its care, including management reports for supervisors, managers, and Department leadership to monitor transition plan completion rates.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to develop and implement a written action plan that outlines key steps it will take to help ensure that its staff develop transition plans for youth in its care. The written action plan will include steps and deadlines for developing and implementing a process to track completion of transition plans for all applicable youth in its care. The action plan will also include steps for the creation of a Transition Plan Dashboard in Guardian to monitor and track completion of Transition Plans for all applicable youth in care as well as steps to include regional data tracking metrics.

**Chapter 3:** Department has not systematically tracked or evaluated the performance of its young adult programming, limiting its ability to ensure youth successfully transition to adulthood

**Recommendation 11:** The Department should develop and implement a comprehensive performance measurement system for its young adult programming, including processes for:

- Tracking relevant performance measures, including outcomes, for all components of its young adult programming.
- Developing written procedures for conducting periodic evaluations of young adult programming to assess the extent to which youths currently and formerly in its care benefit from the Department's service array and to identify areas for potential improvement.
- Defining responsible parties and timelines for implementing the comprehensive performance measurement system.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department recognizes the importance of the need for a comprehensive performance measurement system for its young adult programming. The Department agrees to develop and implement a comprehensive performance measurement system for its young adult programming to include responsible parties and timelines for tracking relevant performance measures and periodic evaluations of young adult programming.

**Recommendation 12:** The Department should continue to work with the U.S. Department of Health and Human Services to fully implement the recommendations related to using NYTD data to assess and evaluate the Department's young adult programming.

Department response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Department agrees to continue working with the U.S. Department of Health and Human Services to fully implement the recommendations related to using NYTD data to assess and evaluate the Department's young adult programming.