

Joint Legislative Audit Committee
September 18, 2024—9:00 a.m.



Lindsey A. Perry
Auditor General



ARIZONA STATE LEGISLATURE

INTERIM MEETING NOTICE OPEN TO THE PUBLIC

JOINT LEGISLATIVE AUDIT COMMITTEE

Date: Wednesday, September 18, 2024

Time: 9:00 A.M.

Place: SHR 109

Members of the public may access a livestream of the meeting here:

<https://www.azleg.gov/videoplayer/?clientID=6361162879&eventID=2024091001>

AGENDA

- Call to order - opening remarks
1. Consideration and vote on the 2025 special audit of the Arizona Department of Child Safety and assignment to the Arizona Auditor General (Office)
 2. Consideration and approval of changes to 2024-2025 performance audit and sunset review schedule
 3. Consideration and approval of additions to 2024-2025 Committees of Reference (COR) assignments for sunset review hearings
 4. Arizona Department of Education presentation on Title I reallocations and school improvement monies
 5. Arizona Department of Child Safety Special Audit—Young Adult Program, July 2024 report
 - Presentation by Office
 - Presentation by Arizona Department of Child Safety
 6. Examining the Delivery of Services to Vulnerable Adults in the Arizona Adult Protective Services System, September 2023 report and initial follow-up report
 - Presentation by Office
 - Presentation by Arizona Department of Economic Security
- Adjournment

Members:

Senator Sonny Borrelli, Chair
Senator David C. Farnsworth
Senator Anthony Kern
Senator Juan Mendez
Senator Catherine Miranda
Senator Warren Petersen, Ex-officio

Representative Matt Gress, Chair
Representative Timothy M Dunn
Representative Nancy Gutierrez
Representative Beverly Pingerelli
Representative Judy Schwiebert
Representative Ben Toma, Ex-officio

09/11/2024
VC

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LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

DATE: September 16, 2024

TO: Representative Matt Gress, Chair
Senator Sonny Borrelli, Vice Chair
Members, Joint Legislative Audit Committee (JLAC)

FROM: Lindsey Perry, Auditor General

SUBJECT: Consideration and vote on the 2025 special audit of the Arizona Department of Child Safety and assignment to the Arizona Auditor General (Office)

Background

A.R.S. §8-465 requires the Office to establish an audit team to provide ongoing performance reviews and analyses of the Arizona Department of Child Safety (Department). Our audit team has conducted audits of numerous Department processes, programs, services, and its compliance with statutes, policies, procedures, and requirements, including the Department's staff recruitment and retention, administrative staffing, the Arizona Families FIRST substance abuse program, permanency practices, the child safety and risk assessment process, Arizona's child abuse and neglect report and substantiation rates compared to national averages, emergency and residential placements, transportation services, the Central Registry, the In-Home Services Program, and the Adoption Program.

My audit team has recently completed a review of the Department's Young Adult Program as authorized by JLAC on June 21, 2023. Currently, the team is ready to start a new audit of the Department. During the past few years, we have noted that legislators and other stakeholders have expressed interest in the Department's investigations of reported child abuse and neglect, including investigations that lead to children being removed from their homes and investigations related to out-of-home caregivers. As such, we recommend that JLAC consider the Department's investigations of child abuse and neglect for the team's next audit assignment.

A.R.S. §§8-454 through 8-456 require the Department to receive, screen, and investigate reports of child abuse and neglect (reports). According to Department policy, it investigates various types of reports, including child fatalities or near fatalities, allegations involving criminal conduct, and allegations of medical child abuse, which are incidents in which a child receives unnecessary and harmful, or potentially harmful, medical care at the request of a caregiver. Additionally, Laws 2024, Ch. 47, effective September 14, 2024, requires the Department to investigate reports involving out-of-home caregivers who work for licensed child welfare agencies/group homes.

Department policy outlines its process for initiating, conducting, and completing investigations of reports it receives, including required time frames for various steps in the investigations process, intended to help ensure the safety of children who are the subject of a report. Generally, the

Department's investigation process requires Department staff to respond to child abuse or neglect allegations within 2 hours to 7 days after receiving a report and to take steps if the child is in danger. Additionally, A.R.S. §8-456(F) requires Department staff to document the investigation's findings in the child's case record within 45 days after receipt of the report.

An audit of the Department's processes for investigating reports of child abuse and neglect could answer questions such as the following:

- What are the different types of child abuse and neglect investigations that the Department conducts?
- What are the applicable requirements related to initiating, conducting, and completing child abuse or neglect investigations? Has the Department initiated, conducted, completed, and documented child abuse or neglect investigations in accordance with these requirements?
- What are the applicable time frames for initiating, conducting, and completing child abuse or neglect investigations? Has the Department initiated, conducted, and completed child abuse or neglect investigations in accordance with the applicable time frames?

We propose answering these questions in 2 audit reports completed over the course of 2 years, with reports due September 30, 2025 and September 30, 2026, respectively. By conducting this work over 2 years, we would have the ability to review a larger number of Department investigations, including ensuring geographic coverage of the entire State. Additionally, because investigations of out-of-home caregivers completed pursuant to Laws 2024, Ch. 47, are not effective until September 14, 2024, a 2-year approach would allow us to review a full year of these investigations during the second audit. Further, a 2-year approach would allow us to conduct a more detailed review of specific investigation types, such as those involving criminal conduct. We expect this approach would potentially allow us to review recommended practices should we identify gaps in the processes we review.

Action required

Consideration of and vote to approve the Office to conduct a special audit of the Arizona Department of Child Safety—processes for investigating reports of child abuse and neglect, to be completed as 2 audit reports due on or before September 30, 2025 and September 30, 2026.



LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

DATE: September 16, 2024

TO: Representative Matt Gress, Chair
Senator Sonny Borrelli, Vice Chair
Members, JLAC

FROM: Lindsey Perry, Auditor General

SUBJECT: Consideration and approval of changes to 2024-2025 performance audit and sunset review schedule

Background

Laws 1978, Ch. 210, established the sunset review process, which requires most State agencies to receive a systematic review typically at least once every 8 years to determine whether they should be continued or terminated. A.R.S. §41-2953(B) directs the Auditor General to provide JLAC a list of agencies scheduled for termination in the next sunset schedule. JLAC previously approved the 2024-2025 performance audit and sunset review schedule and assigned the sunset reviews on that schedule to the Office or to the agencies to conduct self-reviews for the CORs.¹ However, additional changes to the schedule are needed, as detailed below and shown in **Attachment A**.

Legislation passed in the 2024 session, continuing the Arizona Racing Commission for 2 years, placing it on the 2024-2025 sunset review schedule. The Office proposes that JLAC approve a change to the 2024-2025 performance audit and sunset review schedule assigning the Office to perform the Arizona Racing Commission's sunset review.

Action required

Per statute, JLAC is required to determine whether the Office will perform the sunset review of the Arizona Racing Commission or the agency will conduct a self-review for the CORs.

¹ The essential difference between sunset reviews the Office conducts and agency self-reviews is the depth and scope of the work performed. When the Office performs an agency's sunset review, it conducts a performance audit of the agency to identify ways the agency can operate more efficiently and effectively and independently gathers information to address the statutory sunset factors.

Attachment A

2024-2025 performance audit and sunset review schedule

Statutorily mandated audits

Arizona Auditor General conducts

1. Child Safety, Arizona Department of (A.R.S. §41-1966; 2024—Young Adult Program; 2025 to be determined)
2. Corrections, Rehabilitation and Reentry, Arizona Department of (annual audit, Laws 2022, Ch. 327, Sec. 1)
3. Education, Arizona Department of (includes School Safety Program, A.R.S. §§15-154 and 41-2958)¹
4. Sports and Tourism Authority, Arizona (A.R.S. §5-812)
5. Transportation Excise Tax, Coconino County (A.R.S. §41-1279.03)
6. Transportation Excise Tax, Gila County (A.R.S. §41-1279.03)

Sunset reviews (agencies terminate in 2024 and 2025)

Arizona Auditor General conducts

7. Barbering and Cosmetology Board, Arizona
8. Behavioral Health Examiners, Arizona Board of
9. Boxing and Mixed Martial Arts Commsision, Arizona State
10. Economic Security, Arizona Department of
11. Executive Clemency, Arizona Board of
12. Gaming, Arizona Department of
13. Housing, Arizona Department of
14. Insurance and Financial Institutions, Arizona Department of
15. Land Department, Arizona State
16. Nursing, Arizona State Board of
17. Occupational Therapy Examiners, Arizona Board of
18. Osteopathic Examiners in Medicine and Surgery, Arizona Board of
19. Pharmacy, Arizona State Board of
20. Physician Assistants, Arizona Regulatory Board of
21. Regulatory Review Council, Governor's
22. Respiratory Care Examiners, Arizona Board of
23. School Facilities Oversight Board
24. Veterinary Medical Examining Board, Arizona State
25. Followups at 6 and 18 months or longer if not making progress, including Arizona Department of Health Services, long-term care facility complaints and self-reports

Recommend JLAC assign Arizona Auditor General to conduct

26. Racing Commission, Arizona

CORs conduct

1. Beef Council, Arizona
2. Civil Rights Advisory Board, Arizona
3. Credit Enhancement Eligibility Board
4. Criminal Justice Commission, Arizona
5. Exposition and State Fair Board, Arizona
6. Higher Education, Western Interstate Commission for
7. Property Tax Oversight Commission
8. Dental Examiners, Arizona State Board of
9. Massage Therapy, Arizona Board of

¹ The Arizona Department of Education audits are due July 1, 2026.



LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

DATE: September 16, 2024

TO: Representative Matt Gress, Chair
Senator Sonny Borrelli, Vice Chair
Members, JLAC

FROM: Lindsey Perry, Auditor General

SUBJECT: Consideration and approval of additions to the 2024-2025 Committees of Reference (COR) assignments for sunset review hearings

Background

JLAC is statutorily required to assign agencies subject to a sunset review to CORs, regardless of whether the Office will conduct the sunset review or the agency will conduct a self-review for the CORs. Agencies are generally assigned to the CORs reflecting the standing committees most likely to be responsible for hearing any legislation affecting that specific agency and have knowledge or expertise in that particular subject area. The CORs are responsible for holding at least 1 public hearing to discuss the audit and/or sunset review report and receive testimony from agency officials and the public. These hearings should be held after the report is issued and when the Legislature is not in session, or before the third Friday in January.

On November 21, 2022, JLAC approved the 2025 COR assignments for sunset review hearings. Subsequently, during the 2024 legislative session, the Legislature reviewed and continued the Arizona Racing Commission for 2 years, requiring it to be assigned to a COR in 2025. As a result, listed in **Attachment A** (highlighted in yellow) are the Senate President's and House Speaker's recommendations for the Arizona Racing Commission's 2025 COR assignments.

Action required

JLAC may either approve the CORs as recommended by the Senate President and the House Speaker or assign new CORs.

Attachment A
2025 performance audit and sunset review COR schedule

President and Speaker COR recommendations for September 18, 2024 (highlighted in yellow)

Statutory reference	Agency selected for review	COR recommendations
A.R.S. §41-3026.13	Racing Commission, Arizona	House: Commerce Senate: Finance and Commerce

COR assignments approved by JLAC on November 21, 2022

Statutory reference	Agency selected for review	COR assignments
A.R.S. 41-3026.01	Credit Enhancement Eligibility Board	House: Education Senate: Education
A.R.S. 41-3026.02	Veterinary Medical Examining Board, Arizona State	House: Natural Resources, Energy, and Water Senate: Natural Resources, Energy, and Water
A.R.S. 41-3026.03	Beef Council, Arizona	House: Land, Agriculture, and Rural Affairs Senate: Natural Resources, Energy, and Water
A.R.S. 41-3026.04	Gaming, Arizona Department of	House: Commerce Senate: Finance and Commerce
A.R.S. 41-3026.05	Land Department, Arizona State	House: Land, Agriculture, and Rural Affairs Senate: Natural Resources, Energy, and Water
A.R.S. 41-3026.06	Barbering and Cosmetology Board, Arizona	House: Commerce Senate: Finance and Commerce
A.R.S. §41-3026.07	Pharmacy, Arizona State Board of	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-3026.07	Nursing, Arizona State Board of	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-3026.09	Occupational Therapy Examiners, Arizona Board of	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-3026.10	Higher Education, Western Interstate Commission for	House: Education Senate: Education
A.R.S. §41-3026.11	Civil Rights Advisory Board, Arizona	House: Judiciary Senate: Judiciary
A.R.S. §41-3026.12	Physician Assistants, Arizona Regulatory Board of	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-3026.21	Economic Security, Arizona Department of	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-3026.22	Boxing and Mixed Martial Arts Commsision, Arizona State	House: Commerce Senate: Finance and Commerce
A.R.S. §5-812	Sports and Tourism Authority, Arizona	House: Commerce Senate: Finance and Commerce
A.R.S. §15-154 A.R.S. §41-2958	Education, Arizona Department of (including School Safety Program)	House: Education Senate: Education
A.R.S. §41-1279.03	Transportation Excise Tax, Coconino County	House: Transportation and Infrastructure Senate: Transportation, Technology, and Missing Children
A.R.S. §41-1610.02	Corrections, Rehabilitation and Reentry, Arizona Department of	House: Judiciary Senate: Judiciary
A.R.S. §41-1966	Child Safety, Arizona Department of (audit to be determined)	House: Health and Human Services Senate: Health and Human Services
A.R.S. §41-1279.03	School Districts	House: Education Senate: Education

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COMMITTEES:
EDUCATION
APPROPRIATIONS

DISTRICT 18

Arizona House of Representatives
1700 West Washington Street
Phoenix, Arizona 85007

August 7, 2024

Representative Gress,

My colleagues and I would like to request that the next Joint Legislative Audit Committee agenda include a special audit of the Arizona Department of Education's school improvement and Title I funding allocations dating back to January 2023.

The Department explained several months ago that Title I allocations were lower this year due in large part to grant funding reductions at the federal level. Since a portion of Title I grants go toward school improvement, those funds decreased as well. The reductions were so significant – and the Department announced them so late in the fiscal year – that school districts and charter schools were forced to make last-minute cuts to summer programming and employee positions in order to remain within their budgets.

The Department insists it is against its policy to release the data and formulas used to determine the reduced Title I allocations, meaning the impacted schools cannot review how the funding cuts were calculated. School finance officers across the state have tried and failed to re-create the reductions generated by the Department, leading to confusion and doubt regarding the accuracy of those calculations. Adding fuel to the fire is a recent news article¹ that reveals the Department allowed around \$24 million in federal grant monies to expire in September 2023 and waited until this summer to notify schools of the shortfall.

These actions bring into question whether the Department exercises the attention, transparency and clear communication needed to appropriately oversee our state's educational funding. We hope you will allow JLAC to consider a special audit of the Title I and school improvement programs in order to clarify this year's funding reductions and determine which Department practices kept federal funding from reaching schools.

Sincerely,

A handwritten signature in black ink that reads "Nancy Gutierrez".

Nancy Gutierrez
Democratic Whip, LD 18

A handwritten signature in black ink that reads "Oscar De Los Santos".

Oscar De Los Santos
Democratic Assistant Leader, LD 11

A handwritten signature in black ink that reads "Lupe Contreras".

Lupe Contreras
Democratic Leader, LD 22

A handwritten signature in black ink that reads "Melody Hernandez".

Melody Hernandez
Democratic Whip, LD 8

Jennifer Pawlik

Jennifer Pawlik
State Representative, LD 13

Judy Schwiebert

Judy Schwiebert
State Representative, LD 2

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DISTRICT 4



COMMITTEES:
COMMERCE
HEALTH & HUMAN SERVICES

JOINT LEGISLATIVE AUDIT
COMMITTEE
Chairman 2024

Arizona House of Representatives Phoenix, Arizona 85007

August 14, 2024

Sent via Email

The Honorable Nancy Gutierrez
Democratic Whip
1700 W. Washington St.
Phoenix, Arizona 85007

The Honorable Lupe Contreras
Democratic Leader
1700 W. Washington St.
Phoenix, Arizona 85007

The Honorable Oscar De Los Santos
Democratic Assistant Leader
1700 W. Washington St.
Phoenix, Arizona 85007

The Honorable Melody Hernandez
Democratic Whip
1700 W. Washington St.
Phoenix, Arizona 85007

The Honorable Jennifer Pawlik
1700 W. Washington St.
Phoenix, Arizona 85007

The Honorable Judy Schwiebert
1700 W. Washington St.
Phoenix, Arizona 85007

Dear Representatives Gutierrez, Contreras, De Los Santos, Hernandez, Pawlik, and Schwiebert:

I am writing to confirm that my office has received your letter dated August 7, 2024, in which you requested that the next Joint Legislative Audit Committee (JLAC) agenda include a special audit of the Arizona Department of Education's (ADE) school improvement and Title I funding allocations dating back to January 2023.

As you know, JLAC serves several functions. First and foremost, the committee serves as a legislative check on the executive, providing oversight of all state agencies, departments, boards, and commissions to ensure accountability and transparency. As Chairman of JLAC, I sincerely appreciate your interest to utilize the expertise of the Office of the Auditor General to investigate and better understand agencies like ADE.

In response to your letter, Superintendent Tom Horne has directly requested to be placed on JLAC's upcoming meeting agenda to address the misinformation surrounding school improvement and Title I funding allocations. I have always valued how accessible Superintendent Horne and his office have made themselves to me and my colleagues over the years.

Regarding August 7, 2024 JLAC Request Letter

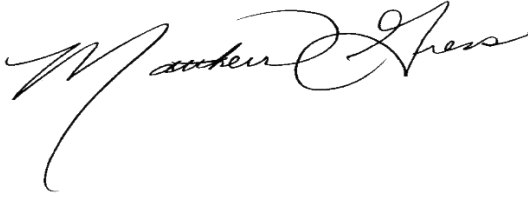
August 14, 2024

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I believe it is essential to better understand the issues at hand by first allowing a public forum for questions and answers before proceeding with a special audit; therefore, I welcome Superintendent Horne's presence at JLAC's September meeting.

Thank you again for your interest, and I look forward to learning more with you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Gress". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Matt Gress

State Representative - Legislative District 4

Arizona House of Representatives

Chairman 2024 | Joint Legislative Audit Committee



LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

DATE: September 16, 2024

TO: Representative Matt Gress, Chair
Senator Sonny Borrelli, Vice Chair
Members, JLAC

FROM: Lindsey Perry, Auditor General

SUBJECT: Arizona Department of Child Safety Special Audit—Young Adult Program, July 2024 report

Background

JLAC is charged with (1) overseeing audit functions of the Legislature and State agencies, including sunset, performance, special, and financial audits; special research requests; and preparing and introducing legislation resulting from audit report findings; (2) requiring State agencies to comply with its findings and directions regarding sunset, performance, special, and financial audits; and (3) receiving reports from the Arizona Auditor General (Office) regarding each audit's results (A.R.S. §§41-1279 and 41-1279.03). Additionally, my Office is responsible for conducting ongoing performance reviews and analysis of the Arizona Department of Child Safety (Department) as required by A.R.S. §8-465 and as assigned by JLAC. My audit team has recently completed a review of the Department's Young Adult Program as authorized by JLAC on June 21, 2023, resulting in a special audit report issued on July 25, 2024.

The Department provides various programs and services to children and young adults 14 years of age or older (youth) currently or formerly in the Department's care to help them develop skills and access resources to support their successful transition to adulthood. The Department refers to these programs and services collectively as the young adult program (Program). The programs and services it offers youth include extended foster care, which allows youth to voluntarily stay in out-of-home care until they turn 21 years old, including continuing to receive case planning from Department staff to help them meet their education and employment goals as they enter adulthood. The Department also offers the extended foster care success coaching program established by Laws 2023, Ch. 141, which provides youth in extended foster care with a contracted coach to help them develop skills and social connections and access education opportunities needed to transition to adulthood.

Our review of the Program found that the Department has implemented or begun to implement several of the extended foster care success coaching program requirements outlined in Laws 2023, Ch. 141, including meeting deadlines to contract for success coaches and developing success coach training. However, the Department needs to improve its program planning and contractor monitoring to help ensure all eligible youth are referred to the success coaching program and that contractors hire sufficient coaches to provide services and meet contractual

and success coaching program requirements. We also found that the Department did not consistently or timely develop federally required transition plans for youth in its care, potentially impacting youths' ability to secure employment or housing, pursue higher education, or maintain family connections as adults. Finally, although the Department has tracked some Program performance measures, it has not developed a process to systematically and comprehensively evaluate if its young adult programming is helping foster youth obtain the skills, education, and competencies necessary to successfully transition to adulthood

We were asked to present the Department's Young Adult Program special audit report, and Marc Owen, Performance Audit Division Manager, will provide an overview of that report. **Attachment A** includes the Department's Young Adult Program special audit report issued in July 2024.

Action required

None. Presented for JLAC's information only.

Attachment A

Report

Arizona Department of Child Safety
Special Audit—Young Adult Program

Arizona Department of Child Safety Young Adult Program

Department has implemented some extended foster care success coaching program requirements but needs to improve its program planning and contractor monitoring; and has not consistently developed youth transition plans or systematically evaluated the young adult program's performance, limiting its ability to ensure youth successfully transition to adulthood

Special Audit

July 2024
Report 24-106

A Report to the Arizona Legislature

Lindsey A. Perry
Auditor General





The Arizona Auditor General's mission is to provide independent and impartial information and specific recommendations to improve the operations of State and local government entities. To this end, the Office provides financial audits and accounting services to the State and political subdivisions, investigates possible misuse of public monies, and conducts performance audits and special reviews of school districts, State agencies, and the programs they administer.

The Joint Legislative Audit Committee

Representative **Matt Gress**, Chair

Representative **Tim Dunn**

Representative **Nancy Gutierrez**

Representative **Alma Hernandez**

Representative **Beverly Pingerelli**

Representative **Ben Toma** (ex officio)

Senator **Sonny Borrelli**, Vice Chair

Senator **David C. Farnsworth**

Senator **Anthony Kern**

Senator **Juan Mendez**

Senator **Catherine Miranda**

Senator **Warren Petersen** (ex officio)

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LINDSEY A. PERRY
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ARIZONA
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MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

July 25, 2024

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

Mr. David Lujan, Cabinet Executive Officer
Arizona Department of Child Safety

Transmitted herewith is the Auditor General's report, *Arizona Department of Child Safety-Young Adult Program*. This report is in response to a June 21, 2023, resolution of the Joint Legislative Audit Committee and was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1279.03. 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 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 Cabinet Executive Officer Lujan 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 Young Adult Program

Department has implemented some extended foster care success coaching program requirements but needs to improve its program planning and contractor monitoring; and has not consistently developed youth transition plans or systematically evaluated the young adult program's performance, limiting its ability to ensure youth successfully transition to adulthood

Audit purpose

To assess the Department's implementation of extended foster care (EFC) success coaching program requirements outlined in Laws 2023, Ch. 141, and determine whether it developed required transition plans for youth in foster care and tracked and evaluated its young adult programming's performance consistent with recommended practices.

Key findings

The Department:

- Has implemented or begun to implement several EFC success coaching program requirements, including meeting deadlines to contract for success coaches and developing success coach training, but needs to improve its program planning and contractor monitoring to help ensure all eligible youth are referred to the success coaching program and that contractors hire sufficient coaches to provide services and meet contractual and EFC success coaching program requirements.
- Did not develop federally required transition plans for 11 of 15 youths we reviewed, and the 4 plans it developed were untimely and did not identify available resources or achievable short-term goals, potentially impacting youths' ability to secure employment or housing, pursue higher education, or maintain family connections as adults.
- Has tracked some young adult program performance measures but has not developed a process to systematically and comprehensively evaluate if its young adult programming is helping foster youth obtain the skills, education, and competencies necessary to successfully transition to adulthood.

Key recommendations

The Department should develop and implement:

- An implementation plan for the EFC success coaching program.
- Written procedures for overseeing and monitoring success coaching contractors.
- A written action plan to ensure Department staff timely develop transition plans for youth that identify available resources and achievable short-term goals.
- A comprehensive performance measurement system for its young adult programming, including processes for tracking relevant performance measures and outcomes.



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The Arizona Auditor General has completed a special audit of the Arizona Department of Child Safety's (Department) young adult program pursuant to a June 21, 2023, resolution of the Joint Legislative Audit Committee (see Appendix A, pages a-1 through a-2, for more information on the areas for review included in the resolution). This special audit assessed the Department's progress in implementing provisions of Laws 2023, Ch. 141, related to the extended foster care success coaching program; determined whether the Department developed required transition plans for youth in foster care ages 14 and older; and determined whether it has developed, tracked, and evaluated performance measures and outcomes for its young adult program, consistent with best practices. This report also provides information about the services the Department offers within the young adult program, including eligibility requirements for participation.

Department provides multiple programs and services to children and young adults in its care intended to help them successfully transition to adulthood

The Department provides various programs and services to children and young adults 14 years of age or older (youth) currently or formerly in the Department's care to help them develop skills and access resources to support their successful transition to adulthood (see textbox for additional information about the transition to adulthood).¹ The Department refers to these programs and services collectively as the young adult program

Transition to adulthood for youth exiting foster care—According to research, the transition to adulthood is a period of a youth's development in which they gain the knowledge, skills, and judgment to become independent and self-sufficient as an adult.¹ Further, research literature indicates that youth who were in the foster care system are more likely to struggle with the transition to adulthood compared to their peers who were not involved in the foster care system.² For example, according to the Annie E. Casey Foundation, youth who transitioned out of the foster care system are more likely to experience mental and physical health issues, homelessness, employment or educational difficulties, and criminal justice system involvement.³ Transition programs, services, and activities for youth in foster care, such as those offered by the Department (see pages 2 through 3 for additional information on these programs), are intended to help address these disparities by helping youth in foster care develop skills, access resources, and find emotional supports and connections with caring adults to help them become self-sufficient and be successful as they transition to adulthood.

¹ Spigner, C.W. (2021). Aging out of foster care: Reflection on transition and transformation. *Children's Bureau Express*, 22(1). Retrieved 4/16/2024 from <https://cbexpress.acf.hhs.gov/article/2021/january/aging-out-of-foster-care-reflection-on-transition-and-transformation/793804031b92c150517620efe54bcb53>; Wood, D., et al. (2018). Emerging adulthood as a critical stage in the life course. In N. Halfon, C.B. Forrest, R.M. Lerner, et al. (Eds.). *Handbook of life course health development* (pp. 123-143). Springer. Retrieved 4/16/2024 from https://www.ncbi.nlm.nih.gov/books/NBK543707/pdf/Bookshelf_NBK543707.pdf

² Annie E. Casey Foundation. (2024). *Child welfare and foster care statistics*. Retrieved 4/16/2024 from <https://www.aecf.org/blog/child-welfare-and-foster-care-statistics>; Spigner, 2021; Wood, et al., 2018.

³ Annie E. Casey Foundation, 2024.

Source: Auditor General staff review of relevant research and literature on youths' transition to adulthood.

¹ For purposes of readability for this report, we refer to children and young adults who are 14 through 25 years of age as "youth," unless the context of the report requires the use of a different term.

(YAP). Some components of the YAP are authorized by State law (see Appendix B, pages b-1 through b-3, for additional information).² Additionally, the U.S. Department of Health and Human Services administers the John H. Chafee Program for Successful Transition to Adulthood (Chafee Program), which authorizes federal funding for state child welfare agencies, including the Department, to implement programs and services to support youth transitioning from foster care to adulthood (see pages 6 through 8 for additional information on the YAP's funding sources).³ As of April 2024, the Department's YAP included the following programs and services, some of which the Department has contracted with vendors to provide:

- **Extended Foster Care (EFC)**—Program to allow youth to voluntarily stay in out-of-home care until they turn 21 years old, including continuing to receive case planning from Department staff to help them meet their education and employment goals as they enter adulthood.^{4,5}
- **EFC Success Coaching Program**—Provides youth in extended foster care with a contracted coach to help them develop skills and social connections and access education opportunities needed to transition to adulthood (see page 4, and Chapter 1, pages 9 through 18, for additional information about the EFC Success Coaching Program).⁶
- **Education and Training Voucher Program**—A federally funded, contracted program to provide youth who have experienced foster care up to \$5,000 annually to pay for postsecondary education and vocational training expenses for no more than 5 years.
- **Independent Living Subsidy Program**—Provides eligible youth stipends to help them live independently.⁷
- **LifeSet**—A contracted pilot program to provide youth living in a congregate care setting, such as a group home, with support to obtain or access housing, mental and physical health services, employment, and educational opportunities.
- **Successful Transition to Adulthood Program**—A contracted program to help youth develop skills to prepare them for adulthood, including educational planning, forming healthy social connections, and career exploration.
- **Transitional Independent Living Program**—A contracted program designed to help youth achieve self-sufficiency and make the transition from adolescence to adulthood. To participate in the program, youth must be at least 18 but less than 21 years old and have previously been in foster care at age 16 or older.⁸

Figure 1 (see page 3) provides additional information on the age groups eligible for each YAP program and service, and Appendix B, pages b-1 through b-3, provides additional details about each YAP program and service.

² Arizona Revised Statutes (A.R.S.) §§8-521 through 8-521.02.

³ 42 United States Code (USC) §677(a) provides states with flexible funding to design and support programs to support various youth needs, such as but not limited to providing youth who experienced foster care at age 14 or older assistance in obtaining a high school diploma and postsecondary education, career exploration, and opportunities to practice daily living skills (such as financial literacy); providing financial, housing, counseling, employment, education, and other appropriate support and services to former foster care recipients who are between 18 and 21 years old; and to make available vouchers for postsecondary training and education to youths who have aged out of foster care.

⁴ According to the Department, during calendar year 2023, approximately 20 percent of youth in out-of-home care who turned 18 years old opted to participate in EFC.

⁵ A.R.S. §8-521.02.

⁶ Laws 2023, Ch. 141.

⁷ A.R.S. §8-521.

⁸ A.R.S. §8-521.01.

As illustrated in Figure 2, as of April 9, 2024, more than 32 percent of the Department's out-of-home care population was between 14 and 20 years old and therefore eligible for various YAP services or programs.

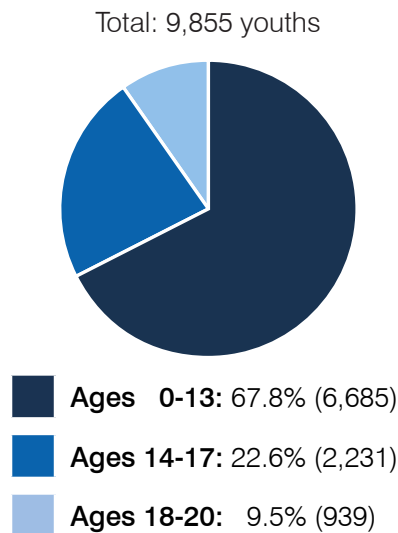
Figure 1
Department coordinates various YAP services for youth 14 years and older

Eligible age groups						
14	15	16	17	18	19	20
				EFC		
				EFC Success Coaching Program		
		Education and Training Voucher Program ¹				
			Independent Living Subsidy Program			
		LifeSet				
Successful Transition to Adulthood Program						
				Transitional Independent Living Program		

¹ The Education and Training Voucher program is available to eligible youth until they turn 26 years old. See Appendix B, page b-2, for additional information.

Source: Auditor General staff review of federal code, State statute, and rule; and the Department's program and service policies, guidance documents, and success coaching contract.

Figure 2
More than 32 percent of youth in Department care are 14 to 20 years old, and nearly 10 percent are 18 to 20 years old
As of April 9, 2024
(Unaudited)



Source: Auditor General staff review of Department-provided data on the number of children and youths in Department care as of April 9, 2024.

2023 legislation required Department to develop success coaching program for youth in EFC

Effective October 30, 2023, Laws 2023, Ch. 141, required the Department to develop and contract for a success coaching program for youth in EFC to help them navigate their transition to adulthood (see textbox for additional information about success coaches). Youth who are at least 17.5 and under 21 years old and who participate or will participate in EFC are eligible for the success coaching program (see Chapter 1, pages 9 through 18, for more information on our review of the Department's implementation of key requirements of the success coaching program, and Appendix C, pages c-1 through c-4, for more information on the requirements of Laws 2023, Ch. 141).⁹

Department required to develop written plans for youth to help them successfully transition out of foster care to adulthood

Federal law requires child welfare agencies, including the Department, to develop written plans for youth beginning at age 14 with descriptions of the programs and services that will help the youth prepare for the transition from foster care to adulthood.¹⁰ For example, transition plans must include information about and plans for youth to obtain housing or employment. According to the U.S. Department of Health and Human Services' Children's Bureau, transition planning provides child welfare professionals the opportunity to work closely with youth to assess these youths' strengths and needs and to help them set goals and make plans to build resiliency and self-sufficiency during their transition from foster care to adulthood. See Chapter 2, pages 19 through 23, for information about our review of the Department's processes for developing transition plans.

Department responsible for submitting data on YAP services and youth outcomes to the federal government

Federal regulations require state child welfare agencies that receive federal funding through the Chafee Program, including the Department, to submit data biannually to the federal government's National Youth in Transition Database (NYTD) regarding outcomes for youth who receive federally funded independent living services, such as outcomes related to the health, education, employment, and housing (see Table 1, page 5, for more information on specific information the Department is required to submit to the federal government for young adults participating in or exiting foster care).¹¹ For example, the Department is required to submit data regarding whether youth have obtained healthcare coverage during their time in foster care or following their exit from foster care. The Department is also required to submit data regarding whether youth have obtained current full-time or part-time employment. See Chapter 3, pages 24 through 27, for more information on our review of the Department's YAP performance measures, including information it submits to NYTD.

Success coaches—Individuals required to have education and/or experience in social work, counseling, or a related field and who are responsible for working with youth referred to the success coaching program. Examples of success coach responsibilities include:

- Weekly engagement and monthly in-person meetings with youth.
- Helping youth secure and maintain safe and stable housing.
- Connecting youth to appropriate services to address physical/behavioral health needs.
- Helping youth build skills and gain knowledge to support self-sufficiency.

Source: Auditor General staff review of Laws 2023, Ch. 141, and the Department's success coaching program contract.

⁹ Laws 2023, Ch. 141, §1, and A.R.S. §8-521.02. Department staff are also responsible for developing case plans for youth in Department care, which are Department-developed documents that should outline the goals and tasks necessary to ensure a youth achieves a permanent placement, such as reunification with their family, adoption, or permanent guardianship.

¹⁰ 42 USC 675(1)(D) and (5)(H). The requirement to finalize a transition plan also applies to young adults who have opted to stay in extended foster care until age 21.

¹¹ 45 Code of Federal Regulations (CFR) 1356.80 through 1356.86.

Table 1

Department required to biannually submit various information about youth services and outcomes to federal government through NYTD
As of June 2023
(Unaudited)

Category	NYTD performance measure (percentage of young adults who received the following services or had the following experiences)	Reported outcomes for 17-year-olds¹	Reported outcomes for 19-year-olds²
Healthcare	Medicaid	55%	59%
	Medical Insurance	80%	83%
	Prescription drug insurance ³	85%	75%
	Substance abuse referral	23%	6%
Education	Educational aid	5%	23%
	Current enrollment and attendance	86%	51%
	High school diploma/GED	7%	53%
	Higher degree	0%	1%
	No diploma or degree	88%	38%
Employment	Current full-time employment	3%	39%
	Current part-time employment	14%	30%
	Employment-related skills ⁴	20%	32%
Counseling	Mental health coverage ⁵	75%	80%
Housing	Experienced homelessness ⁶	38%	21%
	Experienced incarceration ⁶	33%	5%
	Public housing assistance	N/A	3%
Financial support	Use of Social Security benefits	11%	10%
	Public financial assistance	N/A	7%
	Other financial support ⁷	9%	18%

¹ 446 of 678, or 66 percent, of eligible 17-year-olds participated in the NYTD outcome survey from federal fiscal year 2018 through federal fiscal year 2022. Of the 232 17-year-old youths who did not participate in the NYTD outcome survey, 33 youths declined to participate in the survey, 30 youth were deemed incapacitated, 8 youths were incarcerated, 79 youths were on runaway status or missing, and 82 youths were unable to be located.

² 109 of 202, or 54 percent, of eligible 19-year-olds participated in the NYTD outcome survey from federal fiscal year 2018 through fiscal year 2022. Of the 93 19-year-old youth who did not participate in the NYTD outcome survey, 20 youths declined to participate in the survey, and 73 other youths could not be located.

Table 1 continued

- ³ This total represents the percentage of youth with medical health insurance who reported having some insurance that pays for part or all of the costs of prescription drugs.
- ⁴ A youth is considered to have obtained employment-related skills if the youth completed an apprenticeship, internship, or other on-the-job training, either paid or unpaid, in the past year.
- ⁵ This total represents the percentage of youth with medical health insurance who reported having some insurance that pays for part or all of the costs of mental health care services, such as counseling and therapy.
- ⁶ For a 17-year-old youth, these percentages relate to the youth's lifetime experience. For a 19-year-old youth, these percentages relate to the youth's experience in the past 2 years.
- ⁷ A youth is considered to have other financial support if receiving any other periodic and/or significant financial resources or support from another source, such as payments from a spouse or family member (biological, foster, or adoptive), child support that the youth receives for themselves, or funds from a legal settlement.

Source: 42 USC § 677(a)(4) and 45 CFR 1356.83(g); Auditor General staff review of the Department's NYTD outcome survey data collected from federal fiscal years 2018 through 2022.

YAP staffing and administration

As of February 2024, the Department reported it had 83 filled full-time equivalent (FTE) positions and 21 vacancies among staff who supported the YAP. This total includes staff in the following units:

- **Permanency and Youth Services Division (31 filled FTEs, 1 vacancy)**—Responsible for monitoring and coordinating YAP services, such as the EFC Success Coaching program, the Successful Transition to Adulthood program, and the Independent Living program. The Permanency and Youth Services Division is also responsible for reviewing cases of young adults participating in the EFC Program every 6 months to assess their progress transitioning to adulthood and is responsible for supporting staff who submit data regarding federally funded independent living services to NYTD.
- **YAP Support Specialists (52 filled FTEs, 20 vacancies)**—Also known as caseworkers, YAP support specialists are responsible for providing case management services to youth 16 years and older who are expected to remain in out-of-home care until turning 18 years old, including connecting these youth with various services and support offered by the YAP.¹²

YAP revenues and expenditures

As shown in Table 2 (see pages 7 through 8), the Department's YAP revenues primarily come from State General Fund appropriations and federal aid. The Department's fiscal year 2023 YAP revenues totaled more than \$26.7 million, including nearly \$5.2 million in federal pandemic aid, and are estimated to total more than \$27.8 million in fiscal year 2024. The Department's fiscal year 2023 YAP expenditures totaled more than \$26.4 million and are estimated to total more than \$27.8 million in fiscal year 2024. Most of the Department's estimated fiscal year 2024 YAP expenditures are related to youths' room and board (see Table 2, footnote 6, for more information), skills building services, and the Education and Training Voucher Program. Additionally, the Department's expenditures for payroll and related benefits are estimated to total \$1.5 million in fiscal year 2024.

¹² Department policy requires the Department to select another planned permanent living arrangement (APPLA) for youth in its care above the age of 16 who are expected to remain in Department care until they turn 18 years old and may include permanent placement with relatives or foster parents. The Department reported that, as of February 2024, its 1,187 other caseworkers are also responsible for connecting youth 14 years and older who do not have an APPLA placement to YAP services.

Table 2
Schedule of YAP revenues and expenditures
Fiscal years 2022 through 2024
(Unaudited)

	2022 (Actual)	2023 (Actual)	2024 (Estimate)
Revenues			
State General Fund appropriations ¹	\$12,383,764	\$10,438,521	\$13,022,023
Intergovernmental revenues			
Federal pandemic aid ²	5,813,878	5,179,693	-
Other federal aid ³	9,111,113	11,092,117	14,796,957
Total revenues	27,308,755	26,710,331	27,818,980
Expenditures	-	-	
Payroll and related benefits ⁴	917,498	1,454,840	1,500,000
Professional and outside services ⁵	46,350	386,566	520,000
Food	1,518	1,037	1,100
Travel	12,677	10,796	12,000
Aid to organizations and individuals			
Room and board ⁶	15,345,489	17,104,372	19,497,880
Skills building services ⁷	3,605,926	2,296,982	2,500,000
EFC success coaching program ⁸	-	-	1,100,000
Education training vouchers ⁹	3,593,906	1,537,956	1,600,000
Transitional support and services ¹⁰	3,077,101	3,071,276	500,000
Other operating ¹¹	392,468	535,341	550,000
Noncapital equipment	3,979	11,343	11,500
Transfers ¹²	17,773	26,356	26,500
Total expenditures and transfers out	27,014,685	26,436,865	27,818,980
Excess of revenues over (under) expenditures	\$294,070	\$273,466	\$0

¹ According to the Department, it received an increase in federal grant monies in fiscal year 2023 and, as a result, relied less on State General Fund appropriations in fiscal year 2023. In addition, the Department reported that \$900,000 of its State General Fund appropriations in fiscal year 2024 was for its EFC success coaching program.

² The Department received federal pandemic aid revenues to provide additional support for current and former youth in foster care during the COVID-19 pandemic, such as monies for rent, utilities, transportation, and medical expenses. These revenues included monies from the Chafee Program and Education and Training Voucher Program, and according to the Department, the revenues expired for fiscal year 2024.

Table 2 continued

- ³ The Department received federal aid to administer the Chafee Program and Education and Training Voucher Program (see pages 1 and 2 for more information on these programs). According to the Department, it had fiscal year 2021 federal grant balances available to use in fiscal year 2023, and the federal government provided the Department additional Chafee Program monies in fiscal year 2024 from monies left unused by other states). Additionally, the Department reported it received \$200,000 in federal aid in fiscal year 2024 to use for its EFC success coaching program.
- ⁴ The Department reported the increase in payroll expenditures in fiscal year 2023 is the result of an increased number of staff involved in YAP/ independent living services work funded by the Chafee Program and salary increases. Additionally, the Department reported that this total accounts for the 31 full-time staff who are a part of the Department's Permanency and Youth Services Division; however, it does not include payroll and related benefits information for YAP support specialists because they also provide case management services to youth who do not participate in the YAP.
- ⁵ Professional and outside services primarily consisted of costs for temporary employee services and costs associated with the Department's contract with Arizona State University to collect youth survey data for NYTD. According to the Department, the increase in professional and outside services costs in fiscal year 2023 was because of delayed federal billing for NYTD. Additionally, the Department attributed this increase to expenses related to creating additional YAP staff positions and higher indirect information technology costs related to Guardian, which it reported it expects to continue in fiscal year 2024.
- ⁶ According to the Department, room and board consists of foster care maintenance payments expended from Chafee Program monies for youth who are 18, 19, or 20 years old, which cover costs such as food, clothing, and shelter. According to 42 USC 677(b)(3)(A) and (B), the Department may expend no more than 30 percent of its allotment of federal Chafee Program monies for room or board for youth who have aged out of the foster care system and are 18, 19, or 20 years old.
- ⁷ According to the Department, skills building service expenditures were lower in fiscal year 2023 because the Department was in the process of transitioning to the Successful Transition to Adulthood Program, potentially affecting the utilization of skills building services during that year.
- ⁸ The Department began implementing the EFC success coaching program in fiscal year 2024. See Chapter 1, pages 9 through 18, for more information on the Department's progress in implementing this program.
- ⁹ According to the Department, fiscal year 2022 education and training voucher expenditures were higher than usual because federal pandemic aid that was available at the time increased the voucher from \$5,000 to \$12,000 and allowed individuals up to age 27 to receive the vouchers.
- ¹⁰ The Department reported that the decrease in fiscal year 2024 transitional support and services expenditures is because it is phasing out some services, such as increased assistance for housing costs, that had been funded through federal pandemic aid that has expired.
- ¹¹ Other operating costs primarily consisted of conference and registration fees and software support and maintenance costs.
- ¹² According to the Department, these costs are related to the monthly transfers made to the Attorney General's Office for general legal counsel, completed as part of the Department's indirect cost allocations.

Source: Auditor General staff analysis of the Arizona Financial Information System (AFIS)/AZ360 Accounting Event Transaction File for fiscal years 2022 and 2023 for Department-provided program and activity codes related to YAP revenues and expenditures, and Department-provided estimates for fiscal year 2024.



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

As discussed in the Introduction (see page 4), Laws 2023, Ch. 141, requires the Department to implement an EFC success coaching program.¹³ The law outlines various requirements for and key components of the EFC success coaching program (see Table 3 for specific requirements we reviewed, their implementation status, and where within the chapter to find additional details about each requirement, and Appendix C, pages c-1 through c-4, for a comprehensive list of requirements in Laws 2023, Ch. 141). The law also establishes deadlines for implementing some of the required components.

Table 3
Department is in process of implementing 6 of 9 key components of Laws 2023, Ch. 141

Key components of Laws 2023 reviewed	Status	Page
Contracting —Contract with success coaching providers.	Complete	10
Evidence-based frameworks —Incorporate evidence-based frameworks into program.	Complete	11
Youth referrals —Refer eligible youth to success coaches.	In progress	11-13
Oversight —Supervise and monitor success coaching contractors.	In progress	13-14
Training —Train contracted success coaches.	In progress	14-15
University evaluation —Contract with a university to evaluate the program.	In progress	15-16
Quality review —Implement requirements for established EFC quality review committee.	In progress	16
Reporting —Submit initial and quarterly reports to Legislature.	In progress	16-17
Rulemaking —Adopt rules to implement the program.	Incomplete	17

Source: Summary of Auditor General staff assessment of Department’s implementation of key components of Laws 2023, Ch. 141.

¹³ The law went into effect on the general effective date, October 30, 2023. The law requires the Department to implement the EFC success coaching model within 150 days of the general effective date, which is March 28, 2024.

Department met required deadlines to contract for success coaches and incorporated evidence-based frameworks into EFC success coaching program

As of March 2024, the Department had implemented 2 key requirements of the EFC success coaching program. Specifically, the Department:

- Contracted for the EFC success coaching program services**—The Department contracted for specific EFC success coaching program services within the deadlines established in Laws 2023, Ch. 141 (see Figure 3). For example, in July 2023, approximately 4 months before the November 2023 deadline established in Laws 2023, Ch. 141, the Department developed a scope of work for and solicited proposals from contractors to provide the EFC success coaching program. Additionally, in September 2023, approximately 4 months before the January 2024 deadline established in Laws 2023, Ch. 141, the Department selected 6 contractors to hire success coaches and provide success coaching services to youth in the EFC program.¹⁴

Laws 2023 requirement—The Department shall contract for the EFC success coaching program.

Figure 3
Department met required contracting deadlines for EFC success coaching program



Source: Auditor General staff analysis of Laws 2023, Ch. 141, and the Department's procurement records and contracts in the Arizona State Procurement Portal.

¹⁴ The Department contracted with the following 6 providers: Youth Villages, Child Crisis Arizona, Ohana Family Homes, Intermountain Centers for Human Development, Arizona's Children Association, and Christian Family Care. As of May 2024, the Department reported paying the 6 success coaching contractors a combined total of \$382,823.

- **Incorporated aspects of evidence-based frameworks into its EFC success coaching program**—The Department has incorporated some practices from evidence-based child welfare and youth coaching/mentoring programs into its EFC success coaching program.

Laws 2023 requirement—The extended foster care success coaching program shall operate from an evidence-based framework.

Specifically, the California Evidence-Based Clearinghouse (CEBC) has identified multiple child welfare and youth coaching/mentoring programs whose effectiveness is supported by a range of research evidence, and the Department has incorporated practices used by some of these programs into its EFC success coaching program.¹⁵ For example, the Department’s EFC success coaching program:

- Requires success coaches to help youth identify and work toward achieving specific goals during their transition to adulthood.¹⁶
- Includes training for success coaches on providing emergency support to youth in the EFC success coaching program, including crisis intervention and prevention services.¹⁷
- Includes training for success coaches on cultural competency and trauma-informed practices to help support youth at risk for emotional or behavioral difficulties.¹⁸

Department has begun to implement other requirements, such as training and supervising success coaches, but can improve its planning, guidance, and monitoring to ensure program success

Although the Department has begun to implement several other EFC success coaching program requirements, such as providing youth with success coaches, monitoring the program, and reporting on the program’s progress, we identified some needed improvements in the Department’s processes related to these requirements that if not implemented could hinder the EFC success coaching program’s intended goal of ensuring youth successfully transition to adulthood. Specifically, the Department:

- **Provided success coaching services to more than 600 of 1,300 estimated youths but has not developed a written plan for ensuring contractors hire additional success coaches to meet projected program caseloads, creating a risk that some youth may not receive a success coach in a timely manner**—The Department reported that 626 youths received services from contracted success coaches as of May 2024 (see Table 4, page 12, for additional information about the distribution of EFC success

Laws 2023 requirements—The extended foster care success coaching program shall include EFC success coaches for youths in the EFC program.

¹⁵ According to CEBC, it rates programs on a scale based on the level of research support for the program, including programs that fail to demonstrate effect, are supported by promising research evidence, or are well-supported by research evidence.

¹⁶ These practices are part of the My Life program, which, according to CEBC, is a youth-transitioning-to-adulthood program supported by emerging research evidence. See Powers, L. E., Geenen, S., Powers, J., et al. (2012). My Life: Effects of a longitudinal, randomized study of self-determination enhancement on the transition outcomes of youth in foster care and special education. *Children and Youth Services Review*, 34(11), 2179–2187. Retrieved 1/22/2024 from <https://doi.org/10.1016/j.childyouth.2012.07.018>

¹⁷ These practices form part of the LifeSet program, a youth-transitioning-to-adulthood program that, according to a randomized control trial, had a positive impact on employment, earnings, and housing stability. See Courtney, M. E., Valentine, E. J., & Skemer, M. (2019). Experimental evaluation of transitional living services for system-involved youth: Implications for policy and practice. *Children and Youth Services Review*, 96, 396–408. Retrieved 1/23/2024 from <https://doi.org/10.1016/j.childyouth.2018.11.031>

¹⁸ These practices are part of the Transition to Independence Process Model, which, according to CEBC, is a youth-transitioning-to-adulthood program supported by research that found that it had a positive impact on employment, education, and incarceration outcomes for youth with emotional/behavioral disturbances. See Karpur, A., Clark, H. B., Caproni, P., & Sterner, H. (2005). Transition to Adult Roles for Students With Emotional/Behavioral Disturbances: A Follow-Up Study of Student Exiters From Steps-to-Success. *Career Development for Exceptional Individuals*, 28(1), 36-46. Retrieved 4/30/2024 from <https://doi.org/10.1177/08857288050280010601>

coaches and participants across the Department's 6 contractors).¹⁹ Additionally, as of May 2024, the EFC success coaching program contractors employed 36 success coaches to provide coaching services to these 626 youths. The Department projects that its contractors will need to hire approximately 29 additional coaches for a total of 65 coaches to provide services for the population of approximately 1,300 youths expected to be in EFC by no later than June 2025. The Department reported it considered various factors in making these projections, such as the number of existing EFC participants who may not immediately opt to participate in the EFC success coaching program, the rate at which contractors hire supervisors to oversee success coaches, and the turnover rate for success coaches.²⁰

Table 4
Department contractors have hired 36 coaches to serve 626 youths in EFC success coaching program¹
As of May 2024

	Contractor 1	Contractor 2	Contractor 3	Contractor 4	Contractor 5	Contractor 6	Total
Youths served as of May 1, 2024							
17-year-olds	33	59	18	35	48	31	224
18-year-olds	45	16	29	65	88	54	297
19-year-olds	25	2	6	17	11	5	66
20-year-olds	12	3	6	9	7	2	39
Total	115	80	59	126	154	92	626
Coaches employed as of May 1, 2024	7	4	3	9	8	5	36
Average youths per coach ²	16	20	20	14	19	18	

¹ Contractor 1 is Arizona's Children Association; Contractor 2 is Child Crisis Arizona; Contractor 3 is Christian Family Care; Contractor 4 is Intermountain Centers for Human Development; Contractor 5 is Ohana Family Homes; and Contractor 6 is Youth Villages.

² Laws 2023, Ch. 141, §1(C), limits the caseloads of success coaches to 20 youths per coach.

Source: Auditor General staff analysis of Department-provided information.

However, although the Department developed written procedures in April 2024 for referring youth to success coaching program contractors, it had not developed a written plan outlining all of the specific steps, staff roles, and interim timelines to help it meet its participation projections and ensure all youth

¹⁹ The Department reported that it had initially prioritized 17-year-olds for service because that would allow those youth to participate in the entirety of the EFC success coaching program. However, as indicated in Table 4, the Department has served other age groups in the program as of May 2024.

²⁰ The Department reported that contractors have hired a total of 56 coaches since the program's inception. As of May 2024, there were a total of 36 success coaches employed.

in the EFC success coaching program have access to a success coach. Recommended practices for program implementation indicate that successful program implementation can be better achieved with written plans that identify goals, establish steps to facilitate implementation, specify roles and responsibilities for carrying out the steps, identify reasonable timelines for when specific steps will be taken, and include revisions as necessary.²¹ Although we did not identify any youth who were not referred to a success coach in a timely manner, absent a written plan, the Department risks that its goals and projections for success coach hiring may not be achieved, including failing to ensure that there is a sufficient number of coaches for all youth in the program or that youth who join the program at a future date are provided a success coach in a timely manner.

- **Took some steps to monitor and supervise success coaching contractors, but its staff have not consistently or accurately documented contractor performance, and its written procedures do not include guidance for some key oversight and monitoring processes, which may allow some requirements to go unchecked or unfulfilled, including whether coaches exceed maximum caseloads—**

Laws 2023 requirement—The Department shall supervise and monitor the success of the EFC success coaching program.

The Department reported it plans to meet the requirement to supervise and monitor the success of the program by overseeing success coaching contractor compliance with contractual requirements and performance measures, and the Department has assigned 5 full-time staff as of January 2024 to do so. As part of their oversight, Department staff have begun to implement processes for overseeing contractors' compliance with some contractual requirements and processes for providing guidance and assistance to contractors. Specifically:

- Department staff meet with success coaching contractors, including success coaches, as required by each contract. We observed 4 of these meetings in which Department staff discussed youth participation and program policies with the contractors and answered their questions.²² For example, we observed Department staff instruct success coaches on how to help youth develop goals during their transition to adulthood and how to create and maintain transition plans for youth. In addition, we observed Department staff answer questions from contractors and success coaches regarding billing for the program and how to help youth obtain various services.
- In December 2023, the Department had developed and begun implementing a monitoring tool for its staff to track contractors' compliance with some contract requirements, such as whether success coaches assisted youth with transition planning or attempted weekly contact with youth.²³ The monitoring tool includes data fields for Department staff to record whether a success coach has uploaded information to Guardian to demonstrate compliance with contract requirements, such as notes from coaches' engagements with youth.

However, our review of the Department's monitoring tool and Guardian case file information for a sample of 4 of 374 youth who had been assigned a success coach as of January 2024 identified several inconsistencies, which may impact the Department's ability to effectively oversee the EFC success coaching program and ensure that contractors are providing services and meeting all EFC success coaching program requirements.²⁴ For example, we found that Department staff had noted in the monitoring tool that a weekly contact between a success coach and a youth had occurred; however, a note

²¹ Collaborative for Implementation Practice (CIP). (n.d.). *Implementation plans: Best practices and tools to develop an implementation plan*. Retrieved 4/10/2024 from https://www.implementationpractice.org/wp-content/uploads/2022/01/CIP-Practice-Guide-Implementation-Plans_12.20.21.pdf

²² We observed 1 meeting in January 2024, 2 meetings in February 2024, and 1 meeting in March 2024.

²³ Additional contract requirements tracked by the Department's monitoring tool include whether success coaches conducted a monthly in-person meeting with a youth, case management services were provided to the youth, and clinical supervision of success coaches was conducted.

²⁴ We reviewed a stratified random sample of 4 of 374 youth with information recorded in the Department's January 2024 monitoring tool. See Appendix D, page d-2, for more information on our sample.

documenting the event in the youth's case file indicated no contact had occurred. Similarly, staff noted in the monitoring tool that a success coach and a youth had a monthly in-person meeting, whereas the youth's Guardian record indicated that instead, the coach and youth had a phone conversation. Further, the Department's monitoring tool does not track all program requirements, such as whether contracted coaches regularly met with their supervisors or whether coaches reached out to other adults who support the youth, such as teachers or caregivers.²⁵

Additionally, although the Department began using the monitoring tool in December 2023, it did not develop written procedures for using the tool until March 2024. Further, these procedures lack guidance for monitoring some program requirements. For example, the Department's written procedures:

- Do not include guidance for if or how Department staff should review supporting documentation to determine whether success coaches have entered accurate information into Guardian.
- Do not indicate if or how Department staff should verify that success coaches have not exceeded the maximum caseload of 20 youths, as required by Laws 2023, Ch. 141.
- Do not provide guidance for how Department staff should determine a youth's current living situation, such as establishing whether a youth is homeless or has a permanent living arrangement.
- Do not provide guidance for how Department staff should determine whether a youth's transition plan is current prior to the youth turning age 18.

Finally, although the EFC success coaching contract requires the Department to track and assess whether contractors have met certain performance metrics, such as the percentage of youth who had a transition plan or who were placed in a safe housing option that met their needs, the Department has not developed any written procedures for tracking or reviewing these metrics. As of June 2024, the Department reported that it planned to improve the accuracy and use of its monitoring tool.

- **Developed and administered training program for contracted success coaches, but some coaches were not trained prior to working directly with youth, which could have resulted in some youth receiving inadequate services or guidance—**The

Laws 2023 requirement—The Department must develop and administer a success coach training program.

Department developed a training program for the contracted success coaches that covers various topics, including an overview of community services available to youth in the program, accessing and using Guardian to input information regarding youth, providing services to youth who have experienced trauma, and helping youth apply for financial assistance in higher education. The Department began providing this training to the contracted success coaches in November 2023.

However, our review of success coach training documentation for a judgmental sample of success coaches the Department reported had completed training found that 2 of 6 success coaches we reviewed had not met some Department training requirements, including refraining from working directly with youth in the program prior to completing the Department's training, and completing a required training within 60 days of being hired by the contractor.²⁶ Although these 2 coaches eventually received the required training from the Department, some youth may have received inadequate/inappropriate case management, support services, and/or guidance from these success coaches.²⁷ As previously discussed (see pages 13 through

²⁵ Additional contract requirements not included in the Department's tracker include ensuring success coaches have successfully completed Department-provided training prior to working with youth in the program, assessing whether contractors for the program have maintained and updated applicable documentation in a success coach's personnel file, and monitoring quarterly regional youth focus groups.

²⁶ We judgmentally selected Department training records for 6 of the 17 success coaches that the Department reported had completed training as of April 10, 2024—1 for each of the Department's contractors for the program.

²⁷ One success coach had interacted with youth 10 days prior to completing the Department's required training.

14), the Department lacks written procedures and/or guidance for how Department staff should ensure success coaches have met all contractual requirements, including working with contractors to ensure that success coaches have received all required training prior to working with youth in the EFC program.

- Contracted with Arizona State University (ASU) to evaluate the EFC success coaching program, but contract lacks clear evaluation expectations, and the Department lacks a written contract-monitoring process, which could limit the Department’s ability to make future program improvements**—In September

Laws 2023 requirement—The Department shall contract with a public university to evaluate the effectiveness of the vendor’s delivery of the EFC success coaching program.

28 The Department contracted with ASU to evaluate the EFC success coaching program.²⁸ The contract specifies various milestones that ASU must meet from July 2023 through June 2026, such as developing a youth survey, collecting data on EFC success coaching program participants, and submitting periodic reports to the Department (see textbox below for additional examples).

Key contract milestones from ASU’s EFC success coaching program evaluation

July 1, 2023–June 30, 2024	July 1, 2024–June 30, 2025	July 1, 2025–June 30, 2026
<ul style="list-style-type: none"> Hire project staff. Develop youth survey. Gather data on extended foster care best practices. Submit quarterly and annual reports to Department. 	<ul style="list-style-type: none"> Collect data from all youth enrolled in the program. Update materials and infrastructure to increase participation in the study. Submit quarterly and annual reports to Department. 	<ul style="list-style-type: none"> Review evaluation project. Submit quarterly and annual report to Department. Discuss future evaluations of EFC program with Department.

Source: Auditor General staff analysis of Department’s September 2023 contract with ASU.

However, the contract does not specify what the final outcome of ASU’s work should be, such as how ASU’s work will evaluate the effectiveness of the success coaching contractors’ delivery of the EFC success coaching program. Without having established those expectations in the contract, the Department risks ASU’s work not providing helpful information regarding the success coaching program’s effectiveness, thereby limiting the Department’s ability to make future improvements to the program. The Department reported that the YAP staff responsible for overseeing the implementation of the EFC success coaching program were not consulted prior to the Department finalizing the contract with ASU, likely contributing to the contract being finalized without specifying the final evaluation product. Additionally, the contract requires ASU to help the Department develop methods to collect data and metrics on the EFC success coaching program, but because the program is so new, the Department reported it needs more time to fully understand how to best assess the program. The Department also reported that it plans to continue meeting with ASU to discuss the Department’s evaluation needs.

Additionally, the Department has not developed policies or procedures for monitoring ASU’s adherence to the success coaching program evaluation contract, such as establishing time frames for Department staff to perform monitoring activities. A lack of monitoring and oversight could result in unmet milestones or inadequate project evaluation products. For example, although the contract between the Department and ASU includes some evaluation milestones, the Department has not established specific deadlines in the contract for these milestones, nor has it assigned staff to review or ensure these milestones are being

²⁸ The Department contracted with ASU for \$1,564,265. ASU is required to submit invoices to the Department on a quarterly basis for payment of services rendered.

met. The National State Auditors Association’s (NSAA) guidance for contract monitoring recommends that agencies should identify specific, measurable deliverables and reporting requirements, including due dates, and assign staff to ensure that contractors perform their work timely and in accordance with the contract scope of work.²⁹

- **Established an EFC quality review committee, but its procedures lack guidance for how to check compliance with requirements in 2023 law, which prevents the committee from identifying whether ineligible youth are participating in the program or youth are not acquiring services to thrive outside the foster care system—**

The Department had previously established an administrative review panel in 2019 for youth in EFC and is using this panel to meet the new quality review committee requirements of Laws 2023, Ch. 141 (see textbox). The Department had also developed written procedures in 2019 for operating the administrative review panel and developed a report template in 2020 for the panel to use to summarize their reviews.

Laws 2023 requirement—The Department shall establish an EFC quality review committee consisting of Department staff to confirm that youth:

- Meet EFC eligibility criteria.
- Have connections to permanent family or supportive adults.
- Have person-centered case and transition plans to support youth goals.¹
- Are acquiring the individualized skills needed to thrive outside of the foster care system.

¹ See Introduction, page 4, for additional information about transition plans.

However, the Department has not updated these procedures or the report template with guidance or instructions for how to meet all the specific requirements from Laws 2023, Ch. 141, such as ensuring youth have case and transition plans to support their goals (see Appendix B, page b-2, for EFC success coaching program eligibility requirements). As a result, although the Department reported that the EFC quality review committee had reviewed 30 youths in the EFC success coaching program as of March 2024, the committee may not have reviewed all requirements outlined in Laws 2023, Ch. 141. For example, our review of the EFC quality review committee’s report summarizing 3 youths’ reviews found that the committee had confirmed the youth’s eligibility for the success coaching program but did not indicate whether the youth had individualized case and transition plans to support their goals.³⁰ The Department reported that it is in the process of updating its written procedures to include guidance for all the requirements of Laws 2023, Ch. 141, and estimated that it will complete the revisions by June 2024.

- **Submitted an initial and quarterly report with required information about the EFC success coaching program, but needs to obtain input from the JLBC regarding any additional future measures to report—**

The Department submitted an initial report to the Joint Legislative Budget Committee (JLBC) in November 2023 with information consistent with the requirements in Laws 2023, Ch. 141, such as youth’s program responsibilities and supports and services to be

Laws 2023 requirement—The Department shall submit an initial report to the Legislature with various data on the EFC success coaching program and submit quarterly reports to the Joint Legislative Budget Committee with information including the number of youths served in the EFC success coaching program and other performance measures as updated by the EFC quality review committee.

²⁹ National State Auditors Association (NSAA). 2003. *Contracting for services, a national state auditors association best practices document*. Retrieved 3/5/2024 from https://nasact.membershipsoftware.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2003_Contracting_Best_Practices.pdf

³⁰ We reviewed Department reports for 3 of 30 youths the Department reported had received a review as of March 2024.

offered by the EFC success coaching program.³¹ Additionally, on April 1, 2024, the Department submitted its first quarterly report with information consistent with requirements in Laws 2023, Ch. 141, such as the number of youths served in the EFC success coaching program and the percentage of youths participating in reviews with EFC staff.³²

Laws 2023, Ch. 141, also requires the Department to report on other performance measures as updated by the EFC quality review committee and as determined by the JLBC chairperson.³³ The Department reported it has not yet received input from the JLBC chairperson regarding additional performance measures. However, although not required in Laws 2023, Ch. 141, the Department has not taken any action to communicate with or solicit feedback from the JLBC to determine whether additional measures are needed for future reports.

- **Has not yet adopted rules, which could hinder full program implementation—**The

Department has not yet adopted rules to implement the requirements outlined in Laws 2023, Ch. 141.³⁴ However, the Department reported it plans to develop the required rules by January 2025. Absent the required rules, the Department is at risk of not providing adequate guidance on key EFC success coaching program processes and requirements, potentially hindering full or successful program implementation.

Laws 2023 requirement—The Department shall adopt rules to implement Laws 2023, Ch. 141.

The Department reported that it had not yet initiated the rulemaking process because it needed more time to better assess the program’s implementation and to determine whether additional legislative action would impact the requirements related to Laws 2023, including the requirement to adopt rules. However, if the Department were to not adopt the required rules, it risks not providing adequate guidance on key EFC success coaching program processes and requirements, potentially hindering full or successful program implementation.

Recommendations

The Department should:

1. 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.
2. 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,

³¹ Laws 2023, Ch. 141, §1(J), requires the Department to submit a report by March 28, 2024, to the JLBC, the Senate Health and Human Services Committee, and the House Health and Human Services Committee including information on the support and services to be offered by the EFC success coaching program; eligibility requirements; youth program responsibilities; case planning opportunities; and health insurance coverage, educational opportunities, opportunities for mentors, transportation services, and housing for youth in the EFC program. See <https://dcs.az.gov/file/17303/download?token=pneKWAHB> for initial report for additional information.

³² Laws 2023, Ch. 141, §1(K), requires the Department to submit a quarterly report to the JLBC including information on the number of youths served in the EFC success coaching program, the number of youths participating in regular reviews with EFC staff, and other performance measures as updated by the EFC quality review committee and the JLBC chairperson. See <https://dcs.az.gov/file/17559/download?token=Nao3jKgZ> for first quarterly report for additional information.

³³ According to Department staff, the EFC quality review committee has not provided additional performance measures beyond what is required in Laws 2023, Ch. 141, including information on eligibility criteria, connections to a permanent family and supportive adults, person-centered transition plans, and acquiring individualized skills to develop the tools needed to thrive outside of the foster care program.

³⁴ Laws 2023, Ch. 141, did not include a time frame requirement to adopt rules.

including procedures for ensuring success coaches report accurate and consistent information and do not engage with youth prior to completing required training.

3. 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.
4. 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.
5. 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.
6. 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.
7. Request information from the EFC quality review committee and the chair of Joint Legislative Budget Committee to update performance measures in required quarterly reports.
8. Adopt rules to implement Laws 2023, Ch. 141.

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



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

Department is required to develop transition plans for youth in out-of-home care beginning at age 14

Federal law and Department policy require the Department to begin developing transition plans for youth in out-of-home care once they turn 14 years old, and to finalize each youth's transition plan during the 90 days prior to their eighteenth birthday if they are still in the Department's care.^{35,36} Federal law and Department policy require that each youth have a transition plan that is individualized to address areas that will help them prepare for adulthood, such as plans for obtaining employment or housing after leaving the Department's care (see textbox for more information).

Transition plan—A written description of the programs and services that will help a youth prepare for the transition from foster care to a successful adulthood, such as plans for obtaining or accessing housing, health insurance, education, and employment.

Source: Auditor General staff review of 42 USC 675 and Department policy and guidance.

Additionally, the U.S. Department of Health and Human Services' Children's Bureau recommends that transition planning consider a youth's long-term plans and break them down into smaller, short-term goals that are specific and measurable.³⁷ Similarly, Department guidance indicates that transition plans should focus on a youth's goals and the steps involved to achieve these goals. For example, if a youth's long-term goal is to obtain a job when they turn 18 years old, relevant short-term goals within the transition plan could include developing a resumé, exploring career fields, and practicing interviewing skills. Finally, the Children's Bureau indicates that transition planning should take place over multiple years and that the more time youths have to prepare for their transition from foster care, the more successful they will be in adulthood.

Department did not develop required transition plans for most youths we reviewed, and transition plans it did develop were untimely and incomplete

Department did not develop transition plans for 11 of 15 youths we reviewed—Our review of a random sample of 15 of 2,513 youths in out-of-home care who turned 14 through 18 years old during calendar

³⁵ 42 USC § 671(a)(16) and 42 USC 675(1)(D) and (5)(H).

³⁶ The Department is also required to finalize transition plans for young adults in extended foster care 90 days before they turn 21 years old.

³⁷ Children's Bureau. (2018). *Working with youth to develop a transition plan*. Child Welfare Information Gateway. Retrieved 1/3/2024 from <https://www.childwelfare.gov/resources/working-youth-develop-transition-plan/>

year 2023 found that the Department had not developed a transition plan for 11 of the 15 youths as of February 15, 2024 (see Table 5).^{38,39} As also seen in Table 5, these 11 youths lacked a transition plan for between 98 and 1,771 days as of the date of our review. Additionally, 6 of the 11 youths who lacked a transition plan had been in Department care for more than a year at the time of our review.

Table 5
Department had not developed transition plans for 11 of 15 youths we reviewed
As of February 15, 2024

Youth number	Age	Transition plan developed	Days in care without a transition plan ¹
1	15	X	98
2	14	X	125
3	16	X	206
4	15	X	219
5	16	X	282
6	16	X	469
7	17	X	513
8	17	X	684
9	18	X	1,023
10	18	X	1,065
11	18	X	1,771
12	17	✓ ²	N/A
13	17	✓ ²	N/A
14	18	✓ ²	N/A
15	18	✓ ²	N/A

¹ “Days in care without a transition plan” reflects either the number of days elapsed beginning when the youth turned 14 years old if the youth was in out-of-home care at that time or the number of days elapsed since the youth was placed in out-of-home care if they were older than 14 years old when placed. Youth who had a transition plan as of February 15, 2024, are reflected as “N/A” in this column.

² See page 21 for information related to the deficiencies in the quality and timeliness of the 4 transition plans the Department developed.

Source: Auditor General staff review of youths’ Guardian case records.

³⁸ We selected a stratified random sample of 10 of 2,190 youths in out-of-home care who turned 14 to 17 years old during calendar year 2023, and 5 of 323 youths in out-of-home care who turned 18 years old during calendar year 2023. See Appendix D, page d-2, for more information on our sample.

³⁹ Our review of Guardian case file and Department-reported information found that 8 of 11 youths without a transition plan were enrolled in programs or services intended to support the youths’ transition to adulthood, such as EFC or the Successful Transition to Adulthood program.

Finally, the lack of transition planning we identified is not limited to our sample of 15 youths. Specifically, as part of its efforts to monitor and oversee the implementation of the EFC success coaching program, Department staff identified and documented that 233 of 355 (or 66 percent) 17- to 20-year-olds entering or enrolled in the EFC program did not have a required transition plan as of February 2024 (see Chapter 1, pages 13 through 14, for additional information about these oversight processes).

Transition plans the Department developed for 4 youths we reviewed were not developed within required time frames and/or did not include short-term steps for youths to achieve goals as outlined in Department guidance and recommended practices—We identified 2 key problems with the 4 transition plans that the Department had developed for the youths we reviewed as of February 2024. Specifically:

- **Department did not develop 3 of 4 transition plans within required time frames**—The Department did not develop 3 of 4 transition plans until after the youths turned 18 years old, inconsistent with federal law and Department policy that requires the Department to finalize a transition plan within the 90 days prior to a youth’s eighteenth birthday.⁴⁰
- **All 4 transition plans lacked specific short-term steps for youths to achieve their goals, inconsistent with Department guidance and recommended practices, or did not provide measurable time frames**—All 4 transition plans we reviewed lacked specific short-term steps and/or did not identify relevant resources to help the youths achieve their long-term goals for successfully transitioning to adulthood, inconsistent with the plan’s purpose, Department guidance, and recommended practices. Specifically, none of the transition plans we reviewed outlined steps for how the youths would achieve goals outlined in the plans, including not identifying resources that could or should be provided to the youths to help them achieve their goals. For example, 1 transition plan described a youth’s goal related to transportation as “[the youth] wants to get his driver’s license” but did not include short-term steps the youth would take to achieve this goal, such as attending driver’s education classes, or a time frame for doing so. Another plan described a youth’s goal related to education as “[the youth’s] goals include pursuing his GED [General Educational Development]” but did not outline steps or resources for helping the youth achieve this goal, such as attending study sessions or preparation classes or working with a tutor, or a time frame for achieving the goal. Finally, another transition plan stated that “[the youth] is actively seeking employment and has interviewed for some potential jobs” and stated “[the youth] will continue to submit applications until he is hired” but did not outline short-term steps or identify relevant resources, such as meeting with a career counselor or taking an interview-preparation class.

Lack of transition planning could impact youths’ ability to identify needed actions and resources to help them successfully transition to adulthood

Without a written transition plan that identifies and documents the steps youth should take and the resources available to help them achieve their goals, youth in foster care may be less prepared for adulthood. For example, the Children’s Bureau reports that youth in foster care without a transition plan may face difficulty securing employment and housing and maintaining their social and familial connections.⁴¹ Additionally, by not completing transition plans in a timely manner, both the Department and youth will have less time to address goals that may require more time to achieve or plan for, such as preparing for college. Further, because the Department is not consistently developing and finalizing transition plans, the Department may not have sufficient information to assess the performance of its young adult programming, including whether its programming is working as designed. Additionally, it cannot assess whether youth are attaining transition to adulthood goals prior to exiting its care or participating in the EFC program, potentially impacting the

⁴⁰ The Department took between 437 and 690 days after these youths turned age 14 and were placed in out-of-home care to develop their transition plans.

⁴¹ Children’s Bureau, 2018.

Department's ability to help youth build on existing goals if and when youth decide to participate in the EFC success coaching program (see Chapter 3, pages 24 through 27, for more information about the Department's performance measurement practices).

Lack of caseworker accountability mechanisms and training contributed to transition-planning deficiencies

We identified various factors that contributed to deficiencies in the Department's transition-planning practices. Specifically:

- **Department supervisors have not consistently held caseworkers accountable for completing transition plans**—Although Department policy requires Department staff who supervise caseworkers to meet at least monthly with caseworkers to ensure they have completed various responsibilities, Department supervisors have not consistently held caseworkers accountable for completing transition plans for the youth on their caseload. For example, 1 caseworker we interviewed reported that they do not discuss transition planning regularly with their supervisor.⁴² As noted previously, the Department had not developed transition plans for 11 of the 15 youths we reviewed, indicating that supervisors are not consistently holding caseworkers accountable for completing transition plans.
- **Department policy does not specify transition plan review and update frequency**—Although the Department reported that caseworkers are responsible for developing transition plans, Department policy lacks requirements or guidance for how frequently transition plans should be reviewed and/or updated. As a result, caseworkers may be unclear about their responsibilities and requirements for transition planning. For example, a caseworker we interviewed reported that they thought transition planning was only necessary if a youth was not going to reunify with their family before reaching the age of 18. The same caseworker reported they were not sure how often a transition plan should be updated.
- **Caseworkers may not have received sufficient training on how to complete transition plans**—Based on our interviews with 3 caseworkers, the Department did not provide consistent or adequate training to caseworkers on completing transition plans. For example, 1 caseworker reported that they may have received training on transition planning but could not remember the specifics of the training. Another caseworker reported that although their supervisor has helped them complete a transition plan once, they have not received formal training on how to do so.

Additionally, although the Department developed a transition plan template and written guidance for how to develop transition plans in February 2021 and December 2023, respectively, including information on the purpose of different areas within the plan and examples of potential goals for these areas, the Department had not developed or provided a training on the new template or guidance. Although all 3 caseworkers we interviewed were aware of the transition plan template and associated written guidance, 1 caseworker reported they did not find this written guidance useful. Specifically, this caseworker reported that although the written guidance provides information on and examples of what to consider when conducting transition planning, it did not explain how to structure specific goals for youth in a written transition plan document. Additionally, all 3 caseworkers we interviewed also reported they were not always sure how to fill out some sections of the Department's new transition plan template.

- **Caseworkers did not prioritize transition planning**—All 3 caseworkers we interviewed reported that they prioritize youths' immediate needs over documenting written transition plans, such as visiting youth, coordinating services for youth, or accompanying youth to court hearings.

⁴² We judgmentally selected and interviewed 3 of the caseworkers assigned to the 15 youth in our sample. See Appendix D, page d-2, for additional information about our sample.

Recommendations

The Department should:

9. 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.
10. 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:
 - a. Reviewing its transition planning policies, procedures, and guidance to identify and implement needed revisions to its transition planning processes.
 - b. Developing and implementing additional training for caseworkers and their supervisors on transition planning.
 - c. 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.
 - d. 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.
 - e. 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: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendations.



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

Comprehensive performance measurement system is important for determining whether programming is achieving intended outcomes

Literature recommends that government agencies identify relevant measures and benchmarks for their programs' performance and then track them by regularly collecting data on its measures as part of a comprehensive performance measurement system (see textbox for definition).⁴³ Literature also recommends that agencies evaluate program performance to help determine whether programs are working as intended and to identify areas for improvement. Specifically, literature identifies a range of activities to assess program performance, including periodically reviewing performance measures to determine whether a program is producing desired outcomes for its population or conducting research studies to determine whether a program is effective.⁴⁴

Comprehensive performance measurement system—Systematic processes for collecting, monitoring, and reviewing data related to a program's activities, services, and outcomes. Comprehensive performance measurement should include processes for establishing program performance goals and targets, tracking and evaluating performance measures, and adjusting programs or services, as needed.

Source: OMB, 2018; NSAA, 2004; Urban Institute, n.d.; GAO, 2023; Pew-MacArthur Results First Initiative, 2014.

⁴³ Pew-MacArthur Results First Initiative. (2014). *Evidence-Based Policymaking: A guide for effective government*. The Pew Charitable Trusts & The John D. and Catherine T. MacArthur Foundation. Retrieved 3/25/2024 from <https://www.pewtrusts.org/-/media/assets/2014/11/evidencebasedpolicymakingaguideforeffectivegovernment.pdf>; Pew-MacArthur Results First Initiative. (2018). *The role of outcome monitoring in evidence-based policymaking*. The Pew Charitable Trusts & The John D. and Catherine T. MacArthur Foundation. Retrieved 1/23/2024 from <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2018/08/the-role-of-outcome-monitoring-in-evidence-based-policymaking>; Office of Management and Budget (OMB). (2018). *Performance measurement and evaluation*. Retrieved 1/23/2024 from <https://www.evaluation.gov/assets/resources/Performance-Measurement-and-Evaluation.pdf>; National State Auditors Association (NSAA). (2004). *Best practices in performance measurement: Developing performance measures*. Retrieved 1/24/2024 from https://www.nasact.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2004_Developing_Performance_Measures.pdf; Government Finance Officers Association (GFOA). (2018). *Best practices performance measures*. Retrieved 3/25/2024 from <https://www.gfoa.org/materials/performance-measures>; U.S. Government Accountability Office (GAO). (2023). *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*. Retrieved 3/25/2024 from <https://www.gao.gov/assets/830/827710.pdf>

⁴⁴ Urban Institute. (n.d.). *Quantitative Data Analysis*. Retrieved 1/23/2024 from <https://www.urban.org/research/data-methods/data-analysis/quantitative-data-analysis/performance-measurement-and-management>; University of Wisconsin-Madison, Division of Extension. (2022). *Enhancing program performance with logic models*. Retrieved 2/7/2024 from <https://logicmodel.extension.wisc.edu/>; Pew-MacArthur Results First Initiative, 2018; OMB, 2018.

Department has tracked some young adult programming performance measures but has not developed a process to systematically and comprehensively evaluate its measures to determine if its programming is helping foster youth address challenges and successfully transition to adulthood

Department has developed and tracked some performance measures related to its young adult programming—

As discussed in the Introduction (see pages 1 through 8), the Department's young adult programming includes various services intended to help address known issues that former foster youth face in adulthood, including being more likely to experience mental and physical health issues, homelessness, employment or educational difficulties, and criminal justice system involvement. The Department collects data on and tracks several performance measures and other performance information related to its young adult programming, including outputs and outcomes (see textbox for additional information about performance measures and other key terms). For example, the Department:

- Collects data on output measures for the Department's Successful Transition to Adulthood Program, such as whether contractors for the program met required time frames for planning what services youth in the program will receive and whether youth accepted services to help achieve their transition to adulthood goals as outlined in their service plans.
- Annually tracks outputs, such as the number of youths receiving support, for the Education and Training Voucher program, which provides funding for youth to enroll in postsecondary education or vocational training programs.
- Developed a documented structure outlining intended outputs and short-, medium-, and long-term outcomes specifically for the EFC success coaching program. For example, some of the intended short-term outcomes of the success coaching program include helping youth enroll in a program to obtain their high school diploma or receive information about safe and stable housing, and some of the intended long-term goals are that youths obtain their high school diploma or complete other secondary education programs and obtain safe and stable housing.
- Tracks and reviews on a weekly basis various additional outputs and outcomes, including the number and percentage of youths who are referred to and complete a financial literacy course, the number of youths successfully discharged from transitional housing, the number of total active youths in the EFC program, and the percentage of youth who obtained a driver's license.

Department has not developed a comprehensive performance measurement system to evaluate the effectiveness of the YAP and data it submits to the federal government—

Although the Department has developed and tracked some performance information and measures related to its young adult programming, it has not developed a formal process to systematically or comprehensively evaluate whether its young adult programming and services are working as intended to help youth obtain the skills, education, and competencies necessary to successfully transition to adulthood. For example, although the Department developed a documented structure outlining intended outputs and outcomes specifically for the EFC success coaching program, it has not developed a similar structure for outlining, measuring,

Performance measure—A metric or statistic that provides information on how well or efficiently a program is operating. Performance measures include:

- **Outputs**—The units produced or services provided by a service or program, such as the number of youths who were referred to or participated in a service, or the number of coaching sessions youth participated in.
- **Outcomes**—The results of a program and/or the difference made by a program in the short, medium, and long term, such as youths' high school/college graduation and employment rates.

Source: NSAA, 2004; University of Wisconsin-Madison, 2022.

and reviewing intended YAP outputs and outcomes for the entire range of young adult programming in a systematic or comprehensive manner. Additionally, although Department staff meet on a weekly basis to discuss some young adult programming performance measures, the Department reported that these weekly meetings to discuss performance measures are intended to address immediate issues identified with young adult programming on a case-by-case basis and not to evaluate the success or adequacy of the Department's young adult programming as a whole. Further, as reported in Chapter 2 (see pages 19 through 23), by not consistently developing and finalizing transition plans for youth in its care, the Department may lack the necessary information to help it assess the extent to which its programming is helping youth successfully transition to adulthood. Finally, although the Department has assigned various staff to administer the YAP, it has not developed written guidance indicating which staff are responsible for evaluating its young adult programming and how frequently staff should conduct evaluations of the YAP.

Additionally, in 2018, the U.S. Department of Health and Human Services issued a report to the Department recommending it comprehensively evaluate its NYTD data submission, including implementing processes to analyze its NYTD data in conjunction with other data on its young adult programming to help determine what services led to improved outcomes for youth, examining its NYTD survey administration practices, and integrating NYTD data with other data available to the Department (see Introduction, page 4, for additional information about the Department's requirements to submit data to the federal government's NYTD regarding services provided to and outcomes for youth in its young adult programming). As of April 2024, the Department had submitted its response to the U.S. Department of Health and Human Services indicating that it had addressed the recommendations, and reported it was waiting to hear back regarding the U.S. Department of Health and Human Services' assessment of its response.

Department reported it has not prioritized systematically and comprehensively evaluating its young adult programming due to recent implementation of new YAP programs and services—

The Department reported that, because it has adopted multiple new youth programs and services in recent years, it prioritized implementing the young adult programming over completing a comprehensive evaluation of its young adult programming. For example, the Department adopted the Successful Transition to Adulthood Program in February 2022, developed its new transitional housing service in December 2022, and has been working to implement the EFC success coach program since July 2023. However, literature indicates that government agencies should evaluate new or untested programs that possess little or no data on their effectiveness to help ensure they are delivering desired results and that continued support for the program is warranted.⁴⁵ Additionally, the Department had implemented some of its young adult programs several years ago. For example, the Department implemented the Independent Living Program in 1983 and contracted for the Transitional Independent Living Program in 2014.

Without a process to systematically track and evaluate performance measures and program performance, Department may not have the information it needs to improve its young adult programming and to help foster youth address challenges transitioning to adulthood

Without a process to systematically track and evaluate its performance measures, the Department cannot assess the extent to which its young adult programming is helping youth achieve intended outcomes during and after their transition to adulthood. Additionally, the Department may not identify or be aware of opportunities to further modify its programming to ensure improved outcomes for former foster youth. Consequently, foster youth exiting the Department's care could remain at a higher risk for experiencing poor outcomes, including mental and physical health issues, homelessness, employment or educational difficulties, and/or incarceration. Finally, without a process to systematically track and evaluate program performance, the Department may limit or hinder its ability to identify duplication of services or resources.

⁴⁵ Pew-MacArthur Results First Initiative, 2014.

Recommendations

The Department should:

11. 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.
12. 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: As outlined in its [response](#), the Department agrees with the finding and will implement the recommendations.



SUMMARY OF RECOMMENDATIONS

Auditor General makes 12 recommendations to the Department

The Department should:

1. 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 (see Chapter 1, pages 9 through 18, for more information).
2. 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 (see Chapter 1, pages 9 through 18, for more information).
3. 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 (see Chapter 1, pages 9 through 18, for more information).
4. 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 (see Chapter 1, pages 9 through 18, for more information).
5. 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 (see Chapter 1, pages 9 through 18, for more information).
6. 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 (see Chapter 1, pages 9 through 18, for more information).
7. Request information from the EFC quality review committee and the chair of Joint Legislative Budget Committee to update performance measures in required quarterly reports (see Chapter 1, pages 9 through 18, for more information).
8. Adopt rules to implement Laws 2023, Ch. 141 (see Chapter 1, pages 9 through 18, for more information).
9. 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 (see Chapter 2, pages 19 through 23, for more information).

10. 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:
 - a. Reviewing its transition planning policies, procedures, and guidance to identify and implement needed revisions to its transition-planning processes.
 - b. Developing and implementing additional training for caseworkers and their supervisors on transition planning.
 - c. 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.
 - d. 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.
 - e. 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 (see Chapter 2, pages 19 through 23, for more information).
11. 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 (see Chapter 3, pages 24 through 27, for more information).
12. 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 (see Chapter 3, pages 24 through 27, for more information).



Joint Legislative Audit Committee authorized Arizona Auditor General to review Department’s YAP

On June 21, 2023, the Joint Legislative Audit Committee authorized the Arizona Auditor General to conduct an audit of the Department’s YAP and indicated the Arizona Auditor General could consider various potential audit questions related to the YAP. Table 6 outlines these potential questions and includes references to where in the report more information can be found related to these areas.

Table 6
Authorized audit questions

Questions	Information in report
<p>What services does the YAP offer to youth in Department care?</p> <ul style="list-style-type: none">• Are these services consistent with best or recommended practices?• As identified by best or recommended practices, are there additional or alternative services that the Department should provide to youth through the YAP?	<p>See Introduction, pages 1 through 2, and Appendix B, pages b-1 through b-3, for information on the YAP services the Department offers.</p> <p>Although we did not identify recommended practices for the services that the Department should provide to youth through the YAP, State and federal laws authorize and provide funding for some of the YAP services the Department provides (see Introduction, pages 1 through 8, for more information).</p>
<p>What are the eligibility criteria for participation in the YAP?</p> <ul style="list-style-type: none">• How does the Department ensure these criteria are met?• Are these criteria consistent with best or recommended practices?	<p>For information on eligibility requirements for YAP services, see Introduction, pages 1 through 3, and Appendix B, pages b-1 through b-3.</p> <p>For information on the Department’s Quality Review Committee, which is required to assess eligibility for the EFC success coaching program, see Chapter 1, page 16.</p> <p>For information on federal requirements for the Department to work with and help youth in its care identify the programs and services needed to help them prepare for the transition from foster care to adulthood, see Introduction, page 4, and see Chapter 2, pages 19 through 23, for information that the Department did not comply with these requirements.</p> <p>Although we did not identify recommended practices for transition program eligibility, federal law includes various provisions authorizing funding for transition services to youth at age 14 until youth turn 21 years old (see Introduction, page 2, footnote 3, for more information).</p>

Table 6 continued

Questions	Information in report
<p>How does the Department measure YAP outcomes?</p> <ul style="list-style-type: none"> Do the Department's outcomes compare to nationally recognized standards/outcomes or best or recommended practices or outcomes? As identified or recommended by best or recommended practices, are there additional or alternative outcomes that the Department should measure? 	<p>For information on our review of the Department's YAP performance measures and related processes, including needed improvements we identified, see Chapter 3, pages 24 through 27. Our work found that consistent with recommended practices, the Department should measure YAP outcomes to assess the performance of its YAP programs and services; however, we did not identify any nationally recognized performance measures or standards the Department should develop.</p>
<p>How does the Department identify and encourage youth to participate in the YAP?</p>	<p>For information on Department staff who support the YAP, see Introduction, page 6.</p> <p>For information on federal requirements for the Department to work with and help youth in its care identify the programs and services needed to help them prepare for the transition from foster care to adulthood, see Introduction, page 4, and see Chapter 2, pages 19 through 24, for information that the Department did not comply with these requirements.</p>
<p>What is the Department's status in implementing the requirements to expand the extended foster care component of the YAP, such as contracting for extended foster care success coaches, establishing a quality review committee, and meeting required implementation time frames?</p>	<p>For information on the specific provisions of Laws 2023, Ch. 141, see Appendix C, pages c-1 through c-4. For information on the Department's status implementing Laws 2023, Ch. 141, including contracting for success coaches and establishing a quality review committee, see Chapter 1, pages 9 through 18.</p>



Department’s YAP service array descriptions and youth eligibility requirements

This appendix includes a table with descriptions of 7 programs and services included in the Department’s YAP offered to youth who have experience in the foster care system, including eligibility requirements, as applicable.

Table 7
YAP service array descriptions and youth eligibility requirements

Program or service	Youth eligibility requirements ¹	Number of youths enrolled/participating as of May 1, 2024 ²
<p>Extended Foster Care (EFC)—A program that allows eligible youth to voluntarily stay in out-of-home care until they turn 21 years old, including continuing to receive case planning to help them meet their educational and employment goals as they enter adulthood. EFC is intended to help youth achieve various educational outcomes, such as graduating from high school and applying for and completing postsecondary education classes. EFC also includes transitional housing services that provide monthly living expense and rent allowances.</p>	<ul style="list-style-type: none">• Was in Department custody as a dependent child when turning 18 years old and is currently 18, 19, or 20 years old.• Meets at least 1 of the following requirements:<ul style="list-style-type: none">◦ Completing secondary education or an educational program leading to an equivalent credential or enrolled in an institution that provides postsecondary or vocational education.◦ Employed at least 80 hours a month.◦ Participating in a program or activity that promotes employment or removes barriers to employment.◦ Has a medical condition that prevents full-time employment or education.• Arizona resident.• Signed a voluntary EFC agreement to continue care after turning 18 years old and show efforts to work toward educational or occupational goals.	938

Table 7 continued

Program or service	Youth eligibility requirements ¹	Number of youths enrolled/participating as of May 1, 2024 ²
<p>EFC Success Coaching Program—Pursuant to Laws 2023, Ch. 141, provides youth in EFC with access to contracted coaches to help youth develop skills and social connections needed to transition to adulthood (see Introduction, page 4, and Chapter 1, pages 9 through 18, for additional information about this program).</p>	<ul style="list-style-type: none"> • Must be at least 17.5 through 20 years old, meet the same eligibility requirements as the EFC program, and sign a voluntary agreement to participate in the program. 	626
<p>Education and Training Voucher Program—A federally funded, contracted program that provides vouchers for youth worth up to \$5,000 per year for no more than 5 years, or until the youth turns 26 years old, to cover the cost of attendance at an institution of higher education.</p>	<ul style="list-style-type: none"> • Age 16 through 25 years old. • Be at least 16 years old and in foster care or was in foster care or was adopted from foster care after age 16. • U.S. citizen or a noncitizen who is lawfully present. • Personal assets less than \$10,000. • Attend an accredited college, university, technical, or vocational school. • Complete a free application for federal student aid (FAFSA). <p>To receive subsequent waivers, the recipient must be enrolled in a postsecondary education or training program and be making satisfactory progress toward completing that program.</p>	513
<p>Independent Living Subsidy Program—A monthly stipend of \$1,200 provided to foster youth to assist in meeting living expenses.</p>	<ul style="list-style-type: none"> • Age 17 through 20 years old. • In the custody of the Department, a licensed child welfare agency, or a tribal child welfare agency. • Employed or full-time student. 	508
<p>LifeSet—A contracted pilot program to help youth living in a congregate care setting. LifeSet contractors are required to meet weekly with the youth in person and provide services specific to individual youth needs that improve youth outcomes in housing, life skills, and education.</p>	<ul style="list-style-type: none"> • Age 16 through 20 years old. • Resides in an out-of-home, congregate care setting. • Is identified by the Department as needing support due to a lack of personal or community connections, unstable living arrangements, or unstable mental health that may impact their successful transition to adulthood. 	57

Table 7 continued

Program or service	Youth eligibility requirements ¹	Number of youths enrolled/participating as of May 1, 2024 ²
<p>Successful Transition to Adulthood Program—A contracted program to help youth develop skills to prepare them for adulthood, including educational planning, forming healthy social connections, and career exploration.</p>	<ul style="list-style-type: none"> • Age 14 through 20 years old. • Arizona resident. • In out-of-home care and in the custody of the Department or a federally recognized tribal foster care program. 	299 ³
<p>Transitional Independent Living Program—A contracted program that provides assistance in various areas such as finding housing, enrolling in postsecondary education, obtaining employment, and securing behavioral health services to youth who were in foster care but did not opt into EFC when they turned 18 years old.</p>	<ul style="list-style-type: none"> • Age 18 through 20 years old, and met one of the following conditions: <ul style="list-style-type: none"> ◦ Was in out-of-home care and in Department custody, a licensed residential group care facility, or a tribal child welfare agency while 16, 17, or 18 years old or ◦ Was in another state’s child welfare agency under the same condition or ◦ Was in tribal, Department, or other child welfare agency care on the day they turn 18. • Arizona resident. • Was the subject of a dependency petition or adjudicated dependent. 	299 ³

¹ YAP service eligibility requirements come from a variety of sources, including State law, Department rules, federal law, and Department program policies and guidance documents.

² As indicated in Chapter 1 (see pages 11 and 12), the Department estimates that approximately 1,300 youths will be eligible for and participate in the EFC success coaching program by June 2025. However, the Department reported it is not able to provide the total number of youth eligible for each of the programs/services due to various factors. For example, the Transitional Independent Living Program serves youth not currently in the Department’s care, some of whom experienced foster care in other states or jurisdictions, and so the population of eligible youth is unknown. Similarly, because youth are eligible for the Education and Training Voucher Program until age 26 and the Department reported it does not have a method to actively track youth after leaving its care, the Department reported it was unable to provide the total number of youths eligible for the program. Additionally, the Department reported that it could not provide a total eligible population for the Successful Transition to Adulthood Program because youth eligibility is determined on a case-by-case basis using an individual needs assessment.

³ The Department reported that youth participating in the Transitional Independent Living Program and the Successful Transition to Adulthood Program are not tracked separately in Guardian.

Source: Auditor General staff review of A.R.S. §§8-521, 8-521.01, and 8-521.02; AAC Title 21, Chapter 5; 42 USC §677; Department-provided data; and Department program policies and guidance documents.



Extended Foster Care (EFC) success coaching program requirements

Laws 2023, Ch. 141, requires the Department to implement an EFC success coaching program that includes contracted, Department-trained success coaches to provide services and case management for youth in the EFC program. Table 8 (pages c-1 through c-4) outlines the specific requirements, as they appear in law, for the EFC success coaching program and the report page where more information can be found regarding our review of key program requirements.⁴⁶

Table 8
Requirements of EFC comprehensive service program

Requirement	Key information in report
<p>Laws 2023, Ch. 141, §1(B)</p> <p>The Department shall develop, within 10 days of the effective date of the act (November 9, 2023), a scope of work for an EFC comprehensive service model that includes supportive services and required case management provided by contracted community providers for young adults who participate in extended foster care. The EFC comprehensive service model scope of work shall include:</p> <ol style="list-style-type: none">1. Weekly engagement with each young adult.2. Life skills training.3. Mental and physical health and well-being.4. Relational permanency.5. Education and enrollment assistance.6. Assistance with accessing safe housing attainment and stability for young adults.7. Career and employment planning and readiness.8. Assistance with accessing transportation services for young adults.	<p>For additional information on the Department's success coaching program scope of work and contracting, see Chapter 1, page 10.</p>

⁴⁶ We did not review all of the EFC success coaching program's requirements but instead reviewed the Department's progress in implementing the program's key requirements.

Table 8 continued

Requirement	Key information in report
<p>Laws 2023, Ch. 141, §1(C)</p> <p>The EFC comprehensive service model shall include success coaches for young adults in the EFC program. Each success coach shall have a caseload of not more than 20 young adults. The EFC success coaching program shall be based on a practice that is youth driven and shall:</p> <ol style="list-style-type: none"> 1. Promote permanent connections. 2. Support the development of an educational foundation and skill set that enables young adults to gain and maintain employment to support their financial needs. 3. Ensure that young adults reside in safe, stable, and secure housing. 4. Link young adults to appropriate services that address physical and behavioral health needs. 5. Build skills for developing personal agency. 6. Ensure that young adults have the cognitive skills essential to survival. 	<p>For additional information on the Department's status in referring youth to the success coaching program and the Department's projected success coach needs, see Chapter 1, pages 11 through 13. For additional information on success coach caseloads, see Chapter 1, page 12.</p>
<p>Laws 2023, Ch. 141, §1(D)</p> <p>The Department shall supervise and monitor the success of the extended foster care success coaching program.</p>	<p>For additional information on the Department's processes for supervising and monitoring the success coaching program, see Chapter 1, pages 13 through 14.</p>
<p>Laws 2023, Ch. 141, §1(E)</p> <p>Each EFC success coach shall:</p> <ol style="list-style-type: none"> 1. Successfully complete a Department-administered foster care success coach training program. 2. Possess a bachelor's or associate's degree or have equivalent credits equivalent to an associate's degree in the fields of social work, psychology, counseling, marriage and family therapy, behavioral health, or education. 3. Be at least 26 years old. 4. Have experience working with youth or young adults who are involved in systems of care such as foster care. 5. Exhibit the belief that all young adults have the capacity to be successful in life. 	<p>For additional information on the Department's success coach training program, see Chapter 1, pages 14 through 15.</p>

Table 8 continued

Requirement	Key information in report
<p>Laws 2023, Ch. 141, §1(F)</p> <p>The extended foster care success coaching program shall:</p> <ol style="list-style-type: none"> 1. Operate from an evidence-based framework. 2. Ensure that young adults served are aware of their rights to normalcy. 3. Assist young adults to advocate with caregivers to experience activities and opportunities that meet individual interests. 4. Support caregivers in identifying root causes of behaviors that present barriers to transition and provide opportunities that assist young adults in healing and addressing underlying trauma. 5. Develop feedback that allows young adults to communicate their needs and satisfaction with provided services and that allows a young adult to request a different extended foster care success coach. 6. Deliver interventions that are tailored to each young adult’s strengths and experiences. 7. Contract with a public university to evaluate the effectiveness of the vendor’s delivery of the success coaching program. 	<p>For additional information on the use of evidence-based frameworks in the EFC success coaching program, see Chapter 1, page 11. For additional information on the Department’s contract with ASU to evaluate the success coaching program, see Chapter 1, pages 15 through 16.</p>
<p>Laws 2023, Ch. 141, §1(G)</p> <p>The Department shall:</p> <ul style="list-style-type: none"> • Solicit agency(s) to administer EFC comprehensive service model within 30 days of the effective date of the act (November 29, 2023). • Select agency(s) to administer EFC comprehensive service model within 90 days of the effective date of the act (January 28, 2024). • Implement the EFC comprehensive service model within 150 days of the effective date of the act (March 28, 2024). 	<p>For additional information on the Department’s solicitation and selection of success coaching contractors, see Chapter 1, page 10.</p>
<p>Laws 2023, Ch. 141, §1(H)</p> <p>The Department shall adopt rules to implement the act.</p>	<p>For additional information on the status of the Department’s rulemaking, see Chapter 1, page 17.</p>
<p>Laws 2023, Ch. 141, §1(I)</p> <p>The Department shall establish an EFC Quality Review committee to confirm that young adults in EFC meet program requirements, such as:</p> <ol style="list-style-type: none"> 1. Eligibility criteria. 2. Has connections to a permanent family and supportive adults who are actively involved in the young adult’s life. 3. Has a person-centered case and transition plan that supports the young adults’ identified goals and future planning. 4. Is acquiring individualized skills to develop the tools that are needed to thrive outside of the foster care program. 	<p>For additional information on the Department’s processes related to the EFC quality review committee, see Chapter 1, page 16.</p>

Table 8 continued

Requirement	Key information in report
<p>Laws 2023, Ch. 141, §1(J)</p> <p>The Department shall report to the Legislature within 150 days of the effective date of the act on specified topics (March 28, 2024), such as:</p> <ol style="list-style-type: none"> 1. The support and services to be offered by the EFC comprehensive service model. 2. The EFC program's eligibility requirements. 3. The young adult's program responsibilities. 4. Case and transition planning opportunities. 5. Health insurance coverage for young adults in the EFC program. 6. Educational opportunities for young adults in the EFC program. 7. Opportunities for mentors through the EFC program. 8. Transportation services for young adults in the EFC program, including obtaining a driver license. 9. Housing, including semisupervised living arrangements if such arrangements best meet the young adult's needs. 	<p>For additional information on the Department's reporting related to the success coaching program, see Chapter 1, pages 16 through 17.</p>
<p>Laws 2023, Ch. 141, §1(K)</p> <p>The Department shall report to the Joint Legislative Budget Committee on a quarterly basis on:</p> <ol style="list-style-type: none"> 1. The number of young adults serviced in the EFC comprehensive service model. 2. The young adults' participation in regular reviews with EFC staff. 3. Other performance measures as updated by the EFC Quality Review Committee and as determined by the Joint Legislative Budget Committee chairperson. 	<p>For additional information on the Department's reports related to the success coaching program, see Chapter 1, pages 16 through 17.</p>



Scope and methodology

The Arizona Auditor General has conducted this special audit of the Department pursuant to a June 21, 2023, resolution of the Joint Legislative Audit Committee.

We used various methods to address the audit’s objectives, including reviewing applicable federal and State statutes and rules, the Department’s policies and procedures, and information from the Department’s website; and interviewing Department staff. In addition, we used the following specific methods to meet the audit objectives:

- To assess the Department’s progress in implementing key provisions of Laws 2023, Ch. 141, related to the EFC success coaching program, we:
 - Reviewed the Department’s success coaching training materials and records, success coaching program reports, contracts with its 6 success coaching program providers and related procurement documents, the contract with ASU for evaluating the success coaching program, and recommended practices for contract monitoring and program implementation.^{47,48,49}
 - Observed 4 EFC quality review meetings held in November and December 2023, reviewed summary reports from 3 of 30 EFC quality review meetings that the Department reported it had held as of March 2024, and reviewed Department-provided information and data regarding the number of youths and success coaches participating in the success coaching program as of May 1, 2024.
 - Reviewed information on evidence-based programs in child welfare from CEBC’s website and frameworks found in various evidence-based child welfare and youth coaching/mentoring programs we identified and compared these to the components of the Department’s success coaching program.⁵⁰

⁴⁷ We judgmentally selected and reviewed Department training records for 6 of the 17 success coaches that the Department reported had completed training as of April 10, 2024—1 for each of the 6 contractors.

⁴⁸ We reviewed information on contract monitoring from the following source: National State Auditors Association (NSAA). 2003. *Contracting for services, A National State Auditors Association best practices document*. Retrieved 3/5/2024 from https://nasact.membershipsoftware.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2003_Contracting_Best_Practices.pdf

⁴⁹ We reviewed information on program implementation from the following sources: Collaborative for Implementation Practice (CIP). (n.d.). *Implementation plans: Best practices and tools to develop an implementation plan*. Retrieved 4/10/2024 from https://www.implementationpractice.org/wp-content/uploads/2022/01/CIP-Practice-Guide-Implementation-Plans_12.20.21.pdf; New Mexico Legislative Finance Committee (NMLFC). (2023). *Results-Focused government best practices: Recognizing agency progress through the LegisStat Process*. Retrieved 4/10/2024 from https://www.nmlegis.gov/Entity/LFC/Documents/Accountability_In_Government_Act/Best%20Practices%20Guide%20v2022.08.24%20formatted.pdf

⁵⁰ We reviewed research literature on youth coaching and mentoring programs from the following sources: Karpur, A., Clark, H. B., Caproni, P., & Sterner, H. (2005). Transition to Adult Roles for Students With Emotional/Behavioral Disturbances: A Follow-Up Study of Student Exiters From Steps-to-Success. *Career Development for Exceptional Individuals*, 28(1), 36-46. <https://doi.org/10.1177/08857288050280010601>; Powers, L. E., Geenen, S., Powers, J., Pommier-Satya, S., Turner, A., Dalton, L. D., Drummond, D., Swank, P., & other members of The Research Consortium to Increase the Success of Youth in Foster Care. (2012). My Life: Effects of a longitudinal, randomized study of self-determination enhancement on the transition outcomes of youth in foster care and special education. *Children and Youth Services Review*, 34(11), 2179–2187. <https://doi.org/10.1016/j.chilyouth.2012.7.018>; Courtney, M. E., Valentine, E. J., & Skemer, M. (2019). Experimental evaluation of transitional living services for system-involved youth: Implications for policy and practice. *Children and Youth Services Review*, 96, 396–408. <https://doi.org/10.1016/j.chilyouth.2018.11.031>

- Observed 4 meetings between Department staff and EFC success coaching contractor staff held in January, February, and March 2024.⁵¹
- Reviewed a stratified random sample of 4 of 374 youths who had been assigned a success coach and were reflected in the Department's January 2024 monitoring tool.⁵²
- To determine whether the Department developed required transition plans for youth in foster care ages 14 and older, we selected a stratified random sample of 15 of 2,513 youths in out-of-home care who turned 14 through 18 years old during calendar year 2023 and reviewed these youths' case files in Guardian in February 2024.⁵³ We also interviewed 3 of the caseworkers assigned to the 15 youths in our sample.⁵⁴ Finally, we reviewed best practices for developing transition plans.⁵⁵
- To determine whether the Department had developed a comprehensive system of performance measurement for its young adult programming, we compared the Department's performance measurement practices to recommended practices and research related to developing, tracking, and evaluating program performance measures.^{56,57} We also reviewed Department documentation and conducted interviews to assess the Department's status in implementing federal recommendations related to its NYTD data submission.
- To obtain information for the Introduction, we reviewed Department-provided information related to staffing and the number of children and youth in out-of-home care as of April 9, 2024, and federal NYTD

⁵¹ We judgmentally selected 2 meetings held on January 25, 2024, and February 7, 2024, to observe 2 different Department staff interact with different EFC success coaching contractors, including success coaches and/or their supervisors. We also observed 2 virtual meetings held on February 9, 2024, and March 19, 2024, that included representatives from the EFC success coaching contractors and Department staff.

⁵² We reviewed a stratified random sample of 4 of 374 youths with information recorded in the Department's January 2024 monitoring tool. Specifically, we randomly sampled 6 youths from the populations of youth assigned to each of the 4 Department staff responsible for monitoring and supervising EFC success coaching contractors, for a total of 24 sampled youths that were used to develop a smaller sample of observations reviewed by auditors. Additionally, employing a stop-and-go method, we selected the first randomly sampled youth for each of the 4 Department success coaching program consultants from the total of 24 randomly selected youths and reviewed these 4 youths' Guardian case files, including success coaches' notes for monthly and weekly engagement contacts, and January 2024 Department monitoring tool entries.

⁵³ We selected a stratified random sample of 10 of 2,190 youths in out-of-home care who turned 14 to 17 years old during calendar year 2023, and 5 of 323 youths in out-of-home care who turned 18 years old during calendar year 2023. We excluded any youth who turned 14 years old after from November 1, 2023 to December 31, 2023, because it was less likely that these youth would have a transition plan documented by the time of our review in February 2024. We also excluded any youth who turned 18 years old from January 1, 2023 to March 31, 2023, since it is possible for their transition plans to have been finalized prior to 2023, which was outside the scope of our review.

⁵⁴ We judgmentally selected 3 of 15 caseworkers assigned to the 15 youths in our sample, as follows: we selected 2 caseworkers who had documented a transition plan and 1 caseworker who had not documented a transition plan, and ensured 1 of these caseworkers was outside of Maricopa County and at least 1 caseworker had been assigned to a youth for more than 6 months.

⁵⁵ Children's Bureau. (2018). *Working With Youth to Develop a Transition Plan*. Child Welfare Information Gateway. Retrieved 1/3/2024 from <https://www.childwelfare.gov/resources/working-youth-develop-transition-plan/>

⁵⁶ We reviewed information on the importance of systematically measuring and tracking program performance from the following sources: Urban Institute. (n.d.). *Quantitative Data Analysis*. Retrieved 1/23/2024 from <https://www.urban.org/research/data-methods/data-analysis/quantitative-data-analysis/performance-measurement-and-management>; National State Auditors Association (NSAA). (2004). *Best practices in performance measurement: Developing performance measures*. Retrieved 1/24/2024 from https://www.nasact.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2004_Developing_Performance_Measures.pdf; Government Finance Officers Association (GFOA). (2018). *Best practices performance measures*. Retrieved 3/25/2024 from <https://www.gfoa.org/materials/performance-measures>

⁵⁷ We reviewed information on the importance of using performance measurement to facilitate program evaluation from the following sources: Pew-MacArthur Results First Initiative. (2014). *Evidence-Based Policymaking: A Guide for Effective Government*. The Pew Charitable Trusts & The John D. and Catherine T. MacArthur Foundation. Retrieved 3/25/2024 from <https://www.pewtrusts.org/-/media/assets/2014/11/evidencebasedpolicymakingaguideforeffectivegovernment.pdf>; Pew-MacArthur Results First Initiative. (2018). *The Role of Outcome Monitoring in Evidence-Based Policymaking*. The Pew Charitable Trusts & The John D. and Catherine T. MacArthur Foundation. Retrieved 1/23/2024 from <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2018/08/the-role-of-outcome-monitoring-in-evidence-based-policymaking>; Office of Management and Budget (OMB). (2018). *Performance Measurement and Evaluation*. Retrieved 1/23/2024 from <https://www.evaluation.gov/assets/resources/Performance-Measurement-and-Evaluation.pdf>; U.S. Government Accountability Office (GAO). (2021). *Program Evaluation: Key Terms and Concepts*. Retrieved 1/24/2024 from <https://www.gao.gov/assets/gao-21-404sp.pdf>; University of Wisconsin-Madison, Division of Extension. (2022). *Enhancing Program Performance with Logic Models*. Retrieved 2/7/2024 from <https://logicmodel.extension.wisc.edu/>

requirements. We also reviewed research and literature that discussed issues facing foster youth in their transition to adulthood.⁵⁸ Finally, we analyzed unaudited information from the AFIS/AZ360 *Accounting Event Transaction File* for fiscal years 2022 and 2023 for Department-provided program and activity codes related to young adult program revenues and expenditures, and Department-provided estimates for fiscal year 2024.

- To compile information for Appendix A, we reviewed the Joint Legislative Audit Committee's resolution authorizing our audit of the YAP. Additionally, to obtain information for Appendix B, we reviewed the Department's guidance documents, data, and/or contracts related to its YAP programs and services. Further, to obtain information for Appendix C, we reviewed Laws 2023, Ch. 141.

We selected our audit samples 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.

We express our appreciation to the Department's Cabinet Executive Officer and Department staff for their cooperation and assistance throughout the audit.

⁵⁸ Annie E. Casey Foundation. (2024). *Child Welfare and Foster Care Statistics*. Retrieved 4/16/2024 from <https://www.aecf.org/blog/child-welfare-and-foster-care-statistics>; Spigner, C.W. (2021). Aging Out of Foster Care: Reflection on Transition and Transformation. *Children's Bureau Express*, 22(1). Retrieved 4/16/2024 from <https://cbexpress.acf.hhs.gov/article/2021/january/aging-out-of-foster-care-reflection-on-transition-and-transformation/> 793804031b92c150517620efe54bcb53; Wood D., Crapnell T., Lau L., Bennett A., Lotstein D., Ferris M., & Alice, K. (2018). Emerging Adulthood as a Critical Stage in the Life Course. In N. Halfon, C.B. Forrest, R.M. Lerner, & E. M. Faustman (Eds.), *Handbook of Life Course Health Development* (pp. 123-143). Springer. Retrieved 4/16/2024 from https://www.ncbi.nlm.nih.gov/books/NBK543707/pdf/Bookshelf_NBK543707.pdf

DEPARTMENT RESPONSE



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.





LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

DATE: September 16, 2024

TO: Representative Matt Gress, Chair
Senator Sonny Borrelli, Vice Chair
Members, JLAC

FROM: Lindsey Perry, Auditor General

SUBJECT: Examining the Delivery of Services to Vulnerable Adults in the Arizona Adult Protective Services System, September 2023 report and initial follow-up report

Background

JLAC is charged with (1) overseeing audit functions of the Legislature and State agencies, including sunset, performance, special, and financial audits, special research requests, and preparing and introducing legislation resulting from audit report findings; (2) requiring State agencies to comply with its findings and directions regarding sunset, performance, special, and financial audits; and (3) receiving reports from the Arizona Auditor General (Office) regarding each audit's results (A.R.S. §§41-1279 and 41-1279.03).

Additionally, my Office is responsible for conducting and/or contracting for special audits as directed by JLAC or required by State law. Laws 2022, Ch. 313, §55, directed my Office to engage an independent consultant to examine the current adult protective services system and consider best practices to improve the delivery of services in this State. This examination was conducted by the independent firm LeCroy & Milligan Associates, Inc. under contract with my Office, and the contractor issued its special audit report on September 29, 2023.

LeCroy & Milligan Associates, Inc. determined several State agencies, other public entities, and nonprofit organizations have roles and responsibilities related to Arizona's adult protective services system; however, the primary agency and program responsible for protecting vulnerable adults in the State is the Arizona Department of Economic Security's Adult Protective Services Program. LeCroy & Milligan Associates, Inc. also identified several gaps in the system preventing the effective delivery of services that should be addressed to help ensure vulnerable adults are protected and receive the services they need, including:

- Arizona's adult protective services system lacks a strategic direction, which would be important for ensuring vulnerable adults are protected from abuse, neglect, and exploitation and receive the services they need.
- Arizona's adult protective services system lacks a case-management process for ensuring vulnerable adults receive services and key outcome data for assessing system effectiveness.

- Arizona’s adult protective services system community engagement practices align with national guidance and other state practices, however, there are opportunities to more directly involve vulnerable adults and their families.

As a result, LeCroy & Milligan Associates, Inc. made 13 recommendations to help ensure vulnerable adults are protected and receive the services they need during and after an investigation, including key recommendations for the Department of Economic Security to:

1. Establish a working group—The Department should work with the Governor, President of the Arizona Senate, and Speaker of the Arizona House of Representatives to establish and appoint members to a working group to develop a strategic direction for Arizona’s adult protective services system.
2. Develop report identifying roles/responsibilities and other needs—The Department, in conjunction with the working group, should develop a report that identifies the working group’s roles and responsibilities and identifies any authority, resources, legislation, or other action needed to ensure the working group’s ongoing success in identifying and implementing the strategic direction for Arizona’s adult protective services system.
3. Develop and implement a strategic direction and address system gaps—The Department, in conjunction with the working group, should develop and implement a strategic direction for Arizona’s adult protective service system and then take steps to address the additional gaps identified, including determining whether a specific State agency should be assigned the responsibility of case-management services to help ensure that vulnerable adults receive the services they have been referred to after a Department investigation. In addition, identify a system-wide performance-reporting process that could compile performance and outcome information on an annual basis to assess the effectiveness of Arizona’s strategic direction.
4. Obtain input from vulnerable adults—The Department, in conjunction with the working group, should involve vulnerable adults and their families in the development of the strategic direction for Arizona’s adult protective services system.

Subsequently, LeCroy & Milligan Associates, Inc. conducted follow-up work on the 13 special audit recommendations and issued its initial follow-up report on September 12, 2024.

We were asked to present the Arizona Adult Protective Services System special audit report and the results of the initial follow-up report. Jeff Gove, Performance Audit Division Director, will provide an overview of the initial special audit and follow-up reports.

Attachment A includes the Arizona Adult Protective Services System special audit report highlights issued on September 29, 2023, and **Attachment B** includes the initial follow-up report issued on September 12, 2024.

Action required

None. Presented for JLAC’s information only.

Attachment A

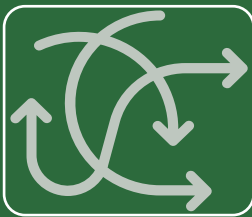
Highlights

Examining the Delivery of Services to
Vulnerable Adults in the Arizona
Adult Protective Services System

HIGHLIGHTS

Audit Purpose Laws 2022, Ch. 313, §55, directed the Arizona Auditor General to engage an independent consultant to examine the current adult protective services system and consider best practices to improve the delivery of services in this state.

Key Findings We determined several state agencies, other public entities, and nonprofit organizations have roles and responsibilities related to Arizona’s adult protective services system; however, the primary agency and program responsible for protecting vulnerable adults in the State is the Arizona Department of Economic Security’s Adult Protective Services Program (DES APS). We also identified several gaps in the system preventing the effective delivery of services that should be addressed to help ensure vulnerable adults are protected and receive the services they need. Specifically:



Arizona’s adult protective services system lacks a strategic direction which would be important for ensuring vulnerable adults are protected from abuse, neglect, and exploitation and receive the services they need.



Arizona’s adult protective services system lacks a case management process for ensuring vulnerable adults receive services and key outcome data for assessing system effectiveness.



Arizona’s adult protective services system community engagement practices align with national guidance and other state practices, however, there are opportunities to more directly involve vulnerable adults and their families.

A summary of our recommendations to help ensure vulnerable adults are protected and receive the services they need during and after an investigation are presented below:

Key Recommendations

Establish a working group – DES should work with the Governor, President of the Arizona Senate, and Speaker of the Arizona House of Representatives to establish and appoint members to a working group to develop a strategic direction for Arizona’s adult protective services system.

Develop report identifying roles / responsibilities and other needs – DES in conjunction with the working group should develop a report that identifies the working group’s roles and responsibilities and identifies any authority, resources, legislation, or other action needed to ensure the working group’s ongoing success in identifying and implementing the strategic direction for Arizona’s adult protective services system.

Develop and implement a strategic direction and address system gaps – DES in conjunction with the working groups should develop and implement a strategic direction for Arizona’s adult protective service system and then take steps to address the additional gaps identified, including determining whether a specific state agency should be assigned the responsibility of case management services to help ensure that vulnerable adults receive the services they have been referred to after a DES APS investigation; and, identifying a system-wide performance reporting process that could compile performance and outcome information on an annual basis to assess the effectiveness of Arizona’s strategic direction.

Obtain input from vulnerable adults – DES in conjunction with the working group should involve vulnerable adults and their families in the development of the strategic direction for Arizona’s adult protective services system.

We also have identified the following areas for future independent review of Arizona’s adult protective services system.



Recommended Areas for Future Independent Reviews

DES APS' investigation process, including timeliness and quality;
Barriers for vulnerable adults to obtaining guardianship and the role and effectiveness of public fiduciaries;
Barriers for vulnerable adults to receive services, including availability of services in rural areas; and
Effectiveness of agreements between DES APS and Tribal authorities.

Attachment B

Followup

Examining the Delivery of Services to
Vulnerable Adults in the Arizona
Adult Protective Services System



LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

September 12, 2024

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

Ms. Angie Rodgers
Arizona Department of Economic Security

Ms. Jennie Cunico
Arizona Department of Health Services

Ms. Carmen Heredia
Arizona Health Care Cost Containment System

We have issued an initial follow-up report regarding the implementation status of the recommendations from the September 2023 *Examining the Delivery of Services to Vulnerable Adults in the Arizona Adult Protective Services System* report (see report 23-114) conducted by the independent firm LeCroy & Milligan Associates, Inc. under contract with the Arizona Auditor General. This examination was in response to Laws 2022, Ch. 313, §55, which directed the Arizona Auditor General to engage an independent consultant to examine the current adult protective services system and consider best practices to improve the delivery of services in this state.

The September 2023 report made 13 recommendations to the Arizona Department of Economic Security, including 1 recommendation that also applied to the Arizona Department of Health Services and the Arizona Health Care Cost Containment System. My Office contracted with LeCroy & Milligan Associates, Inc. to conduct an initial followup with these entities, and their status in implementing the recommendations is as follows:

- The Arizona Department of Economic Security was in the process of implementing 5 recommendations, and the remaining 8 recommendations directed to it were not yet applicable.
- The Arizona Department of Health Services was in the process of implementing the 1 recommendation direct to it.

September 12, 2024
Page 2

- The Arizona Health Care Cost Containment System was in the process of implementing the 1 recommendation direct to it.

We will conduct a 24-month followup with these entities on the status of the recommendations that have not yet been implemented.

Sincerely,

Lindsey A. Perry

Lindsey A. Perry, CPA, CFE
Auditor General

Audit # 23-114

**Examining the Delivery of
Services to Vulnerable
Adults in the Arizona Adult
Protective System**

Initial Follow-Up Report



LeCroy & Milligan
ASSOCIATES, INC.

Initial Follow Up Report - Audit #23-114

Submitted to:

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About LeCroy & Milligan Associates:

Founded in 1991, LeCroy & Milligan Associates, Inc. is a consulting firm specializing in social services and education program evaluation and training that is comprehensive, research-driven, and useful. Our goal is to provide effective program evaluation and training that enables stakeholders to document outcomes, provide accountability, and engage in continuous program improvement. With central offices located in Tucson, Arizona, LeCroy & Milligan Associates has worked at the local, state, and national level with a broad spectrum of social services, criminal justice, education, and behavioral health programs.

The September 2023 audit of the Arizona Adult Protective Services System identified several gaps in the system preventing the effective delivery of services to help ensure vulnerable adults are protected and receive the services they need. We made 13 recommendations to the Arizona Department of Economic Security (DES) Adult Protective Services Program (APS) including 1 recommendation that applied to DES APS, the Arizona Department of Health Service (ADHS), and the Arizona Health Care Cost Containment System (AHCCCS), and the status of implementing the recommendations is as follows:

Status of recommendations

Recommendations for DES APS

- In Process 5
- Not yet Applicable 8

Recommendation for ADHS

- In Process 1

Recommendation for AHCCCS

- In Process 1

Chapter Two - Strategic Direction

1. **Establish a working group**—DES should work with the Governor, President of the Arizona Senate, and Speaker of the Arizona House of Representatives to establish and appoint members to a working group to develop a strategic direction for Arizona’s adult protective services system. Specifically, to ensure working group membership adequately represents various system stakeholders, the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, and DES should consider appointing 5 members each, for a total of 20 members, or appointing an alternate number of members with each appointing an equal number. When appointing working group members, the Governor’s Office, President of the Arizona Senate, Speaker of the Arizona House of Representatives, and DES could consider a wide range of stakeholders, such as representatives from AHCCCS, ADHS, and the Attorney General’s Office; public fiduciaries; representatives from local law enforcement; vulnerable adult advocates; Tribal representatives; legislative members; and members from the Arizona House of Representatives’ Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults.

Implementation in process—During the 2024 legislative session, the Legislature considered 2 bills that included provisions to establish a working group/study committee related to Arizona’s adult protective services system. DES representatives met with legislative members and staff to discuss the legislation, provided legislative staff with suggested modifications to the legislation, communicated its support to 1 of bill sponsors, and officially signed in to support both bills during the legislative process. DES also reported that DES representatives met with Governor’s Office representatives on a regular basis starting in December 2023 through the end of the legislative session in June 2024 to discuss various legislative issues, including our September 2023 audit of the Arizona Adult Protective Services System and the legislation to establish a working group/study committee.

In April 2024, Laws 2024, Ch. 100, §10, established a 25-member vulnerable adult system study committee, effective September 14, 2024. The study committee consists of:

- Six members appointed by the Speaker of the Arizona House of Representatives, including:
 - Two members of the Arizona House of Representatives from different political parties, one of whom the Speaker shall designate to serve as co-chair of the committee.
 - Two members who represent assisted living facilities.
 - One member who represents a statewide association that advocates on behalf of persons who provide services to persons with developmental disabilities.
 - One licensed health care professional who provides health care services to elderly vulnerable adults.
- Five members appointed by the President of the Arizona Senate, including:
 - Two members of the Arizona Senate from different political parties, one of whom the President shall designate to serve as co-chair of the committee.
 - One member who represents a statewide organization that advocates for elderly vulnerable adults.
 - One member who represents a statewide organization that advocates on behalf of persons affected by Alzheimer's disease.
 - One member who represents a statewide association representing Arizona firefighters.
- Seven members appointed by the Governor, including:
 - One member to represent the Governor's Office.
 - One member who serves as a public fiduciary.
 - Two members who are employed by a local law enforcement agency or who are employed by a statewide organization that represents law enforcement.
 - Two members who represent nursing care institutions.
 - One member who is on the Governor's Advisory Council on Aging.
- One member appointed by the Arizona Attorney General to represent the Arizona Attorney General's Office.
- The DES, ADHS, and AHCCCS directors or their designees.
- The DES Long-Term Care Ombudsman or their designee.
- The Executive Director of the Navajo Area Agency on Aging or their designee.
- The Executive Director of the Intertribal Council of Arizona or their designee.

As of September 9, 2024, the Speaker of the House had appointed his 6 members of the vulnerable adult system study committee, including designating 1 House member to serve as co-chair of the committee; the President of the Senate had appointed his 5 members of the vulnerable adult study committee, including designating 1 Senate member to serve as co-chair of the committee; and the Governor had not yet appointed her 7 members of the vulnerable adult study committee (see the legislature's [website](#) for more information on the committee's membership). In addition, as of September 4, 2024, DES had provided the committee co-chairs with the name of the DES designee to the vulnerable adult study committee. The 24-month follow up will continue to review the vulnerable adult system study committee's activities.

2. **Develop report identifying roles/responsibilities and other needs**—DES in conjunction with the working group should develop a report that identifies the working group's roles and responsibilities and identifies any authority, resources, legislation, or other action needed to ensure the working group's ongoing success in identifying and implementing the strategic direction for Arizona's adult protective services system. DES should submit the report to the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, Senate and House Health and Human Services committees, Joint Legislative Budget Committee, and Arizona House of Representatives' Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults by November 1, 2024.

Implementation in process—As discussed in the explanation for Chapter 2, Recommendation 1, Laws 2024, Ch. 100, §10, established a 25-member vulnerable adult system study committee. The vulnerable adult system study committee is responsible for:

- Developing and implementing a coordinated vulnerable adult delivery system that ensures the health and safety of vulnerable adults.
- Recommending best practices relating to responding to and investigating complaints.
- Researching best practices related to adult protective services at the state, municipality, and community levels.
- Researching and making recommendations on how the vulnerable adult system can ensure that vulnerable adults receive services they require after the vulnerable adult system completes its investigatory duties, including assigning a specific agency with the responsibility to provide or coordinate case management.
- Researching and identifying common statewide outcomes.
- Identifying best practices for data collection and data sharing by various entities involved in providing vulnerable adult services.
- Reviewing and recommending changes to statutes and rules that govern vulnerable adult services.
- Addressing the needs of persons with developmental disabilities and persons who are elderly or who have a physical disability, including the training requirements for persons who are caring for these populations.

The study committee is required to provide a report of its findings and recommendations to the Governor, President of the Arizona Senate, and Speaker of the Arizona House of Representatives by October 1, 2025.

As of September 9, 2024, the vulnerable adult system study committee had not yet met, and thus had yet to identify any authority, resources, legislation, or other action needed to help it meet its responsibilities; however, Laws 2024, Ch. 100, §10, requires the study committee to submit a status update of its progress, including any recommended statutory changes, to the Senate and House Health and Human Services Committees by December 31, 2024. The 24-month follow up will continue to review the vulnerable adult system study committee's activities.

3. **Develop a strategic direction**—Once the roles and responsibilities and any needed authority, resources, legislation, or other action has been provided and/or approved, DES in conjunction with the working group should develop a strategic direction for Arizona’s adult protective services system that will help ensure the safety of vulnerable adults and establishes protocols for services during and after an investigation. This should include:
- Evaluating how Arizona’s adult protective services system can target systems beyond just the individual victim to help alleviate mistreatment risk;
 - Determining whether a specific state agency should be assigned the responsibility of case management services to help ensure that vulnerable adults receive the services they have been referred to after a DES APS investigation;
 - Establishing processes, in conjunction with recommendations in Chapter Three, for measuring and reporting on vulnerable adult level outcomes, including key outcomes that will help demonstrate whether Arizona’s processes are reducing maltreatment, vulnerable adult-centered, and provide services both during and after an investigation;
 - Considering practices from other states, including those outlined in this report;
 - Addressing gaps outlined in this report; and
 - Reviewing and considering whether to continue and or build upon efforts outlined in other plans, such as Report of the Abuse & Neglect Prevention Task Force (2019), Implementation and Impact of Arizona’s Abuse & Neglect Prevention Task Force Recommendations (May 2022), Arizona State Plan on Aging 2023-2026 (2023), Adult Protective Services Action Plan (March 2020), DES APS Year in Review Reports (SFYs 2020, 2021 and 2022), and DES Annual Report (SFY 2022).

Not yet applicable—According to Laws 2024, Ch. 100, §10, the vulnerable adult system study committee should develop a strategic direction for Arizona’s adult protective services system. In addition, the law also authorizes the committee co-chairs to designate work groups to research, study, and make recommendations to the study committee, and states that at least 2 work groups shall be established to separately address the needs of persons with developmental disabilities and persons who are elderly or who have a physical disability. As of September 9, 2024, the vulnerable adult system study committee had yet to meet because its membership was not yet finalized (see Chapter 2, Recommendation 2). Therefore, this recommendation is not yet applicable. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

4. **Develop action plan for implementing strategic direction**—Once the strategic direction is established, DES in conjunction with the working group should complete the following tasks: Develop an action plan for implementing Arizona’s strategic direction, including identifying DES and other state agency responsibilities, policies, protocols, practices, and/or statutory changes that are needed, and critical resources and commitments that must be in place for ensuring Arizona’s strategic direction can be met. The action plan should include specific tasks with estimated completion dates along with assigned responsibilities and a process to regularly review progress and modify the plan as needed.

Not yet applicable—According to Laws 2024, Ch. 100, §10, once a strategic direction is established, DES, in conjunction with the work groups established by the committee co-chairs, shall develop an action plan for implementation (see Chapter 2, Recommendation 3, for more information about the work groups). As of September 9, 2024, the vulnerable adult system study committee had yet to meet to begin developing a strategic direction because its membership was not yet finalized.

Therefore, this recommendation is not yet applicable. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

Chapter Three - Accountability Mechanisms

1. **Identify accountability mechanisms**—DES in conjunction with the working group identified in Chapter Two, Recommendation #1, should identify accountability mechanisms that could be implemented for Arizona’s adult protective services system, such as independent oversight and quality assurance processes.

Not yet applicable—As discussed in the explanation for Chapter 2, Recommendation 1, effective September 14, 2024, Laws 2024, Ch. 100, §10, established a 25-member vulnerable adult system study committee to develop a strategic direction for Arizona’s adult protective services system. However, as of September 9, 2024, the vulnerable adult system study committee had yet to meet to begin developing a strategic direction because its membership was not yet finalized. Therefore, this recommendation is not yet applicable. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

2. **Identify and develop common, system-wide outcomes**—DES in conjunction with the working group identified in Chapter Two, Recommendation #1, should identify and develop a set of common, system-wide outcomes that can be used to assess the effectiveness of Arizona’s strategic direction, including identifying which entities will collect outcome data and how they will do so, and developing a quality assurance process for ensuring the outcome data is complete and accurate. The outcomes should include (1) reduced elder and vulnerable adult mistreatment; (2) reduced recurrence of victimization and or self-neglect; (3) service plans that are vulnerable adult-centered; and (4) vulnerable adult engagement with services during and after an investigation that alleviate mistreatment.

Not yet applicable—See explanation for Chapter 3, Recommendation 1. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

3. **Identify system-wide performance reporting process and develop report identifying roles/responsibilities and other needs**—DES in conjunction with the working group identified in Chapter Two, Recommendation #1, should identify a system-wide performance reporting process that could compile performance and outcome information on an annual basis to assess the effectiveness of Arizona’s strategic direction. In designing the performance reporting process, the working group should resolve the data issues identified in this report, including, limitations of a lack of data on service provision; lack of unique identifiers, absence of outcome reporting between agencies, concerns with confidentiality; and lack of case management processes that may be a barrier to sharing vulnerable adult level information and reporting on aggregate outcomes for vulnerable adults. DES in conjunction with the working group should develop a report that identifies the authority, roles and responsibilities, and resources needed to design and implement the system-wide reporting process. DES should submit the report to the Governor, President of the Arizona Senate, Speaker of the Arizona House of Representatives, Senate and House Health and Human Services committees, Joint Legislative Budget Committee, and Arizona House of Representatives’ Ad Hoc Committee on Abuse and Neglect of Vulnerable Adults.

Not yet applicable—See explanation for Chapter 3, Recommendation 1. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

4. **Implement system-wide performance reporting process**—Once the roles and responsibilities and any needed authority, resources, legislation, or other action has been provided and/or approved, DES in conjunction with the working group should take the necessary steps to implement a system wide performance reporting process that compiles performance and outcome information on an annual basis to assess the effectiveness of Arizona’s strategic direction.

Not yet applicable—See explanation for Chapter 3, Recommendation 1. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

Chapter Four - Community Engagement Recommendations

1. **Incorporate community engagement into strategic direction**—DES in conjunction with the working group identified in Chapter Two, Recommendation #1, should incorporate community engagement into the strategic direction for Arizona’s adult protective services system identified in Chapter Two, Recommendation #3.

Not yet applicable—As discussed in the explanation for Chapter 2, Recommendation 1, effective September 14, 2024, Laws 2024, Ch. 100, §10, established a 25-member vulnerable adult system study committee to develop a strategic direction for Arizona’s adult protective services system. However, as of September 9, 2024, the vulnerable adult system study committee had yet to meet to begin developing a strategic direction because its membership was not yet finalized. Therefore, this recommendation is not yet applicable. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.

2. **Continue community engagement efforts**—DES APS should continue community engagement efforts and ensure educational materials at a minimum include the information recommended by the ACL 2020 Voluntary Consensus Guidelines for state APS systems.

Implementation in process—According to our review of information contained in DES APS’ outreach logs, between August 2023 and July 2024, DES APS conducted 51 presentations for more than 1,160 community members, stakeholders, and mandated reporters, such as nurses and first responders. Consistent with the federal Administration for Community Living (ACL) 2020 Voluntary Consensus Guidelines for state APS systems, the DES APS educational materials presented during these events defined vulnerable adult maltreatment, provided guidance on when and how to report vulnerable adult maltreatment, and described DES APS’ authority and limitations related to investigating vulnerable adult maltreatment. The 24-month follow up will continue to review DES APS’ community engagement efforts.

3. **Continue satisfaction survey**—DES APS should continue its vulnerable adult satisfaction survey; expand it to include other case participants; offer a Spanish language option; continue to use

<p>feedback from the survey to improve its processes for vulnerable adults; and consider incorporating survey responses into performance reports.</p>
<p>Implementation in process—Between August 2023 and July 2024, DES APS’ quality assurance unit continued performing monthly satisfaction surveys of vulnerable adults to obtain feedback on vulnerable adults’ interactions with DES APS and their level of satisfaction with APS services, including implementing a Spanish language version of the survey. The results of these surveys were shared with DES Division of Aging and Adult Services management. In response to some survey feedback indicating respondents said APS could improve communication by explaining what APS staff would be doing and what to expect, DES developed a flyer that explains DES APS’ authority and what DES APS may do when investigating an allegation of abuse, neglect, and/or exploitation. DES APS also reported it initiated a pilot program to have investigators provide the flyer to DES APS clients. However, DES APS reported that given limited budget resources, it does not plan to expand the survey to other case participants in fiscal year 2025. As a result, the 24-month follow up will continue to review DES APS’ implementation of this recommendation, including its efforts to use survey feedback to improve its processes.</p>
<p>4. Continue to partner with key agencies—DES APS, AHCCCS, and ADHS should continue to find ways to partner in community engagement activities, such as Speak Up AZ!, to educate the public on recognizing and reporting signs of abuse, neglect, and exploitation of adults.</p>
<p>Implementation in process—DES APS, ADHS, and AHCCCS have continued to collaborate on the ongoing implementation of the Speak Up AZ! Campaign, which is designed to educate the public and mandated reporters about recognizing and reporting signs of abuse, neglect, and exploitation of adults. The Speak UP AZ! campaign has utilized a variety of advertising mediums to disseminate its message. For example, between June 2023 and February 2024, Speak UP AZ! was featured in more than 3,500 television advertisements, nearly 3,800 radio advertisements, and in advertisements on YouTube, Facebook, and Instagram. Additionally, as of August 2024, the Speak Up AZ! website was still active and included definitions and how to report suspected incidents of abuse, neglect, and exploitation of adults. Further, DES APS, ADHS, and AHCCCS each participated in presentations/panel discussions at the June 2024 World Elder Abuse Awareness Day Conference. For example, DES APS participated in a panel discussion on recognizing and preventing tribal elder abuse. The 24-month follow up will continue to review DES APS’, AHCCCS’, and ADHS’ partnerships in community engagement activities.</p>
<p>5. Obtain input from vulnerable adults—DES in conjunction with the working group identified in Chapter Two, Recommendation #1, should involve vulnerable adults and their families in the development of the strategic direction for Arizona’s adult protective services system.</p>
<p>Not yet applicable—See explanation for Chapter 4, Recommendation 1. The 24-month follow up will continue to review the vulnerable adult system study committee’s activities.</p>

