



DIVISION OF
**DEVELOPMENTAL
DISABILITIES**

DRAZ COMIT QUARTERLY REPORT

January to March 2026

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The Arizona Department of Economic Security, Division of Developmental Disabilities (DDD or Division), is in receipt of the Disability Rights Arizona (DRAZ) January 2026, February 2026, and March 2026 monthly reports detailing the first quarter activities of the Compliance, Oversight, Monitoring, and Investigations Team (COMIT) group home monitoring program. This Division report is required to be submitted at the end of each calendar quarter in compliance with Arizona Revised Statutes § 36-595.03.

Completed DRAZ COMIT Monitoring Visits

DRAZ COMIT is contractually required to complete at least 220 monitoring visits in 2026. During the first quarter, DRAZ completed 22 initial monitoring visits, and the Division received the following monitoring tools:

- January - 0 completed monitoring tools
- February - 12 completed initial visit monitoring tools
- March - 10 completed initial visit monitoring tools

DRAZ also completed follow-up monitoring visits, which are abbreviated reviews, for members seen in 2023, 2024, or 2025. The Division received:

- March - 4 completed follow-up monitoring tools on members from the first three years of the pilot.

Person-Centered Service Plan (PCSP) Documentation

A detailed review of the PCSP-related findings reported by COMIT regarding the 22 initial monitoring reviews (Jan.-March 2026) showed the following:

- Individual Findings: One member's PCSP did not have any goals. This issue was elevated for immediate resolution. A Change in PCSP form was completed within 17 calendar days to include goals.
- Systemic Issues Identified: The following trends, primarily involving documentation, were shared with the appropriate teams for ongoing review, training, and process improvement. To ensure sustained progress, these documentation trends will continue to be addressed in the mandatory recurring Circle of Support Meetings and training.
 - ☒ DRAZ documented that medication information did not match across the PCSP, the Medication Administration Records (MARs), and the behavior plan (BP). The Division notes that the PCSP and the BP are documents completed at a point in time, while the MARs will be updated on an ongoing basis. If the MARs match the current medical prescriptions, this would not be considered a finding.
 - ☒ Documentation errors, such as the following:
 - ☒ Missing contact information for providers (speech therapy, physical therapy, etc.)
 - ☒ Missing, incomplete, or unmeasurable progress on goals
 - ☒ Missing or incomplete Risks and Safeguards
 - ☒ DRAZ documented findings that goals were not written in a SMART format. While AHCCCS mandates that goals must be measurable, it does not require the SMART goal format; however, the Division recognizes the format as a best practice and is continuing training to use the SMART goal format.

Behavior Plans

The Division requires every member with complex needs to have a current, clinically appropriate behavior plan. Of the 22 COMIT initial monitoring visits completed in this quarter:

- Approved: 15 members have current, Program Review Committee (PRC) approved plans.
- In-queue: 2 plans are scheduled for formal Committee review.
- Development: The 5 remaining plans are currently in the development phase with their respective Qualified Vendors.

Since December 2025, the PRC has expanded the number of teams reviewing behavior plans and hired two additional PRC Chairs and Administrative Assistants in response to the growth in Members served and to meet the corresponding increased demand for behavior plan review. In the first quarter of 2026, DDD initiated multiple sessions with internal and external stakeholders to complete a root cause analysis and foster continuous improvement for the behavior plan development and approval process. DDD is currently analyzing these findings to finalize a timeline and action steps to improve the behavior plan process from end to end.

Quality Improvement and Technical Assistance Unit

As part of the permanent monitoring program, DDD formalized a dedicated team, the Quality Improvement and Technical Assistance (QITA) Unit, by expanding the roles of existing Quality Assurance staff. The team is responsible for:

- Assessing the monthly findings and recommendations from the COMIT monitoring tools and reports.
- Working with Qualified Vendors to address service delivery issues identified during the COMIT monitoring review process.
- Documenting and referring trends and issues to the appropriate functional areas for re-training, education, and resolution as needed.
- Providing Qualified Vendor follow-up as well as ongoing monitoring and technical assistance in response to the COMIT monitoring reviews.

The team evaluates COMIT monitoring tools to identify findings and recommendations for members with complex needs, and meets with Qualified Vendors to provide technical assistance and maintain compliance. They are responsible for overseeing the Corrective Action Plan (CAP) process, which includes reviewing, approving, and providing guidance to the vendor on CAP development. To validate long-term resolution, the team conducts a series of onsite follow-up visits at regular intervals to verify that training, policies, and documentation are properly implemented.

The QITA Unit will, as part of the ongoing technical assistance provided, inform and educate Qualified Vendors about COMIT, its roles, authority, and responsibilities, as well as the Qualified Vendor's roles and responsibilities. QITA will present information and education at multiple provider meetings each year about the COMIT group home monitoring program and re-emphasize the required documentation that must be completed and present in the group home at all times per A.A.C.R6-06 Article 8. Additionally, DDD will continue to issue ongoing technical assistance announcements/bulletins to all group home vendors.

For example, on April 22, 2026, DDD issued an announcement to remind vendors of their

responsibilities regarding the COMIT monitoring process. This announcement directed vendors to respond promptly to DRAZ scheduling requests via telephone or email and to provide all required documentation in a timely manner. Vendors are to inform all staff of the COMIT program and ensure that the appropriate staff are present to participate in the monitoring visit, answer questions, and provide access to required documents. The announcement concluded by directing vendors to have a backup person assigned to be present in case an unexpected issue arises on the day of the visit.

During the first quarter of 2026, the QITA team completed the following activities:

- **Initial Vendor Meetings:** Analyzed the outcomes of the DRAZ COMIT team monitoring visit with 7 Qualified Vendors covering 11 members. Additional meetings have been scheduled with 3 vendors covering 4 members. The 5 remaining vendors from the March reports are being scheduled, which will cover the remaining 7 members.
- **Request for Corrective Action:** Issued 11 requests for Corrective Action from vendors.
- **CAP Review and Approval:** CAPs are currently in the 30-day development stage.
- **On-site Monitoring of CAP Adherence:** Vendors have 30 days to implement the CAPs, so on-site monitoring will occur in the second quarter.
- **Provision of Technical Assistance:**
 - ☒ Issued a reminder to all Qualified Vendors outlining their responsibilities with the DRAZ COMIT monitoring process.
 - ☒ During the Initial Vendor Meetings, reminded Qualified Vendors that there is a Behavior Plan Workshop they can take to help with writing behavior plans.

Quality of Care Concerns (QOC) and Incident Reports (IRs)

During the first quarter, DRAZ reported 15 Total Assigned Investigations. Of those 15 investigations, 6 were completed and 9 remain open.

For the first quarter, the Division reported 1,875 QOCs, of which 1,410 have been closed. The Division maintains an ongoing technical dialogue with DRAZ COMIT to ensure that monitoring findings consistently align with established DDD standards and regulatory interpretations. To bridge gaps in evaluation, the Division provided programmatic clarifications in the following key areas:

- **2/26/2026:** It was noted that vendor agencies had copies of incident reports that were not provided by the Division. Clarification was provided that while Support Coordinators must be notified of all behavioral incidents, not all behavioral incidents require an Incident Report. Some agencies use the Incident Report form to notify Support Coordination, but that does not mean the report needs to be entered into the Incident Reporting system. DRAZ COMIT reported concerns about situations that should have been reported, and the request was made for DRAZ COMIT to submit copies to the QITA email for further review.

COMIT and QITA Collaboration

QITA collaborates with the COMIT team and provides specific internal member documents requested for COMIT reviews. During this quarter, COMIT requested records for 14 members with complex needs. All requested records were submitted to COMIT within 5 business days of receipt of the request.

In January, the COMIT team requested documents for 5 members from QITA. Those documents

were provided; however, the February DRAZ report stated that 3 of the requests were only partially met, while 2 requests were not provided. This was discussed during the February 26, 2026 meeting between COMIT and the Division, and it was clarified that all requested documentation was provided timely, but was not received by COMIT due to technical issues.

The documentation was re-sent to COMIT on February 27, 2026, following a meeting at which COMIT was provided verification that all 5 requests were addressed. The March DRAZ report noted that the 3 partial responses were received, but the other 2 requests were not updated. This was discussed during the March 26, 2026, meeting, and COMIT verified receipt of the documents and stated that the monthly report would be updated once the final review was completed.

During the February 26, 2026, meeting, COMIT informed the Division regarding concerns that Qualified Vendors were not allowing COMIT monitors access to complete their monitoring visits. One specific instance was identified; however, the visit was able to be rescheduled and completed.

The Division appreciates the ongoing partnership with DRAZ as we work toward a shared goal of empowering Arizonans with developmental disabilities to live self-directed, healthy, and meaningful lives.

If you have any questions, please contact Staci Rodarmel, Interim Program Compliance Audit Manager, at (928) 326-4375 or srodarmel@azdes.gov.