

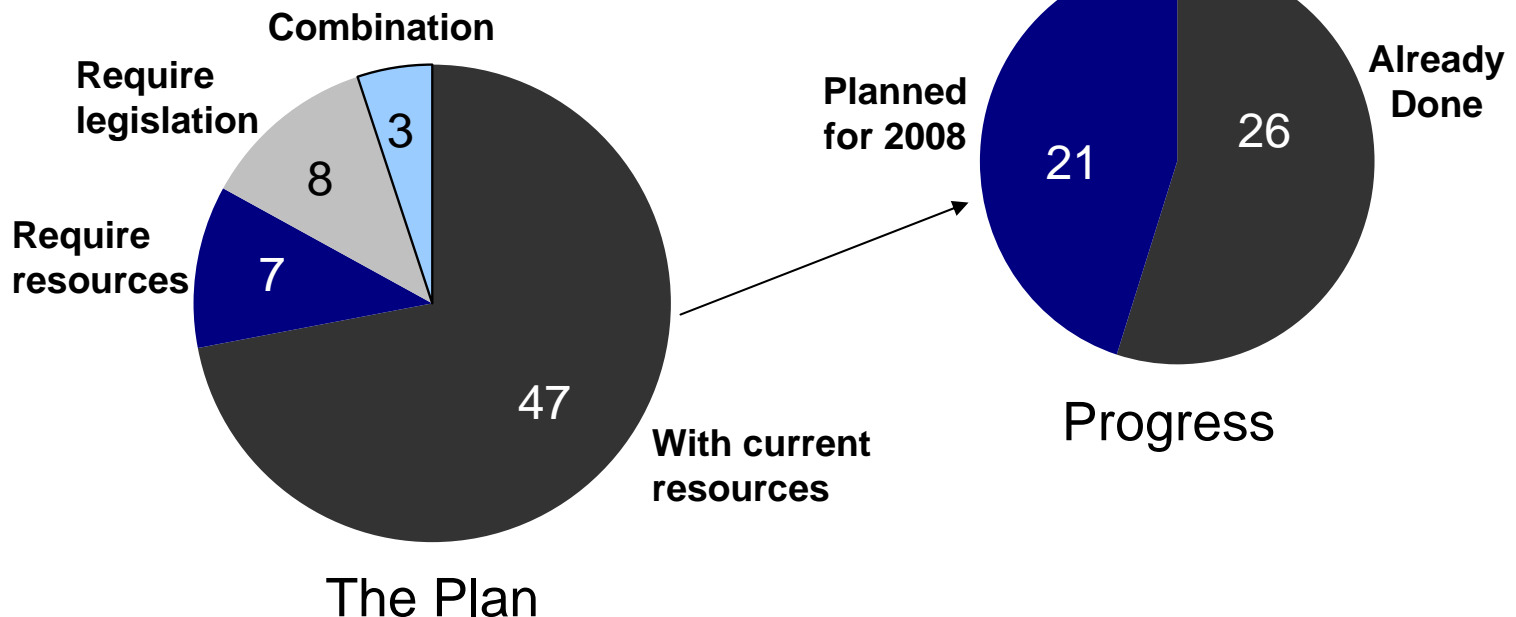
Health Professions

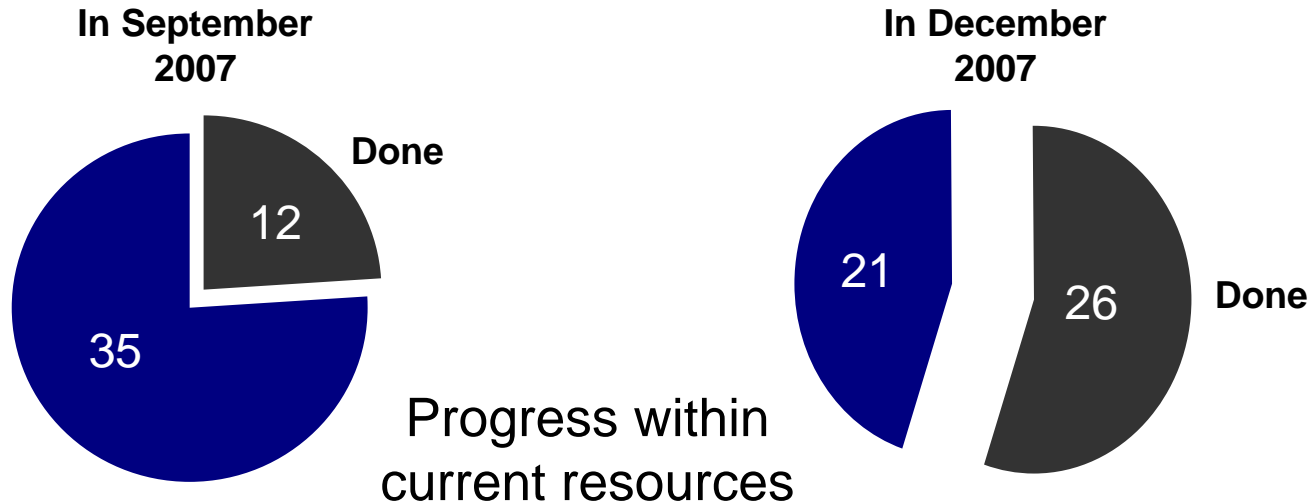
Performance Audit Action Plan

January 23, 2008

13 Findings resulted in 65 potential actions in August 2007 Audit Report:

- 7 require added resources.
- 8 require legislation.
- 3 started with current resources, need additional resources or legislation
- **26 of 47 completed with current resources.**





Major Actions Taken:

- Sexual misconduct cases →
- Sanction Guidelines →
- Business Continuity Plans →

Results:

- Developed quicker responses
- Adopted: Sec/ Boards/ Commissions
- Developed for credentialing and high priority cases

- Finding 1:** The state's governance structure involving HPQA and the Boards and Commissions, responsible for regulating health care professions, does not promote effective performance management.
- Finding 2:** Credentialing process inconsistencies and control weaknesses leave the potential for unqualified individuals to practice in Washington and leaves citizens at risk.
- Finding 3:** Weaknesses in internal controls over the background check process and lack of national criminal background checks can expose the public to serious risk.
- Finding 4:** Changes in the complaint management process are needed to more accurately assess complaints and to improve responses to complainants.
- Finding 5:** Improve public education regarding citizens' rights to file complaints about credential holders with HPQA.
- Finding 6:** Investigations of complaints are delayed by process issues and compromised by staffing shortages and internal control deficiencies.
- Finding 7:** Deficiencies in the disciplinary (legal) process have led to inconsistent and delayed discipline of practitioners who engage in unprofessional conduct or provide below standard of care.
- Finding 8:** The compliance process does not ensure that practitioners who have been disciplined comply with the terms of their sanctions.
- Finding 9:** DOH and HPQA oversight needs improvements to ensure that its credentialing and its regulatory processes are performing as intended.
- Finding 10:** The DOH internal audit function is understaffed and does not perform evaluations of HPQA to identify and report deficiencies that could impede HPQA's ability to achieve its goals.
- Finding 11:** Legacy information systems does not enable HPQA to effectively and efficiently license health practitioners, manage consumer complaints and monitor compliance with disciplinary action.
- Finding 12:** HPQA's disaster recovery plans and business continuity plans are not fully developed.
- Finding 13:** Hard copy files related to licensing and investigations are not physically secure.

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F13	R1	We have upgraded our policies on destruction of confidential records to require that they be deposited in locked containers and shredded.	DOH	Done 07/16/2007			→
F9	R1, 2	We have enhanced our performance management system to meet the criteria suggested in the audit.	Laurie Jinkins	Done 06/2007			→
F6	R2	We have state-approved guidelines in place.	Patti Latsch	Done 10/22/2002			→
F7	R2	We will continue to enter default orders according to the law.	Patti Latsch	Done Ongoing			→
F8	R2	We adopted a procedure in 2006 that requires a single reminder letter to practitioners who have not met a due date. We will continue to send follow-up or requests for additional information where needed.	Bonnie King	Done 06/29/2006			→
F13	R2	We have procedures in place regarding confidential materials in keeping with DOH policy.	DOH	Done 07/16/07			→
F10	R3	We will contract out specialized internal audits as needed.	Bill White	Done Ongoing			→
F11	R3	We will continue to regularly install security patches, as they are available.	Sam Marshall/ DIRM	Done Ongoing			→

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F8	R5	The compliance procedure, which includes the letter templates, is available on the HPQA Intranet site. We are replacing desk manuals with online procedures.	Patti Latsch	Done 06/29/2006			
F6	R6, 7	We already have these practices in place to ensure all investigators receive appropriate training.	Patti Latsch	Done 10/22/2002			→
F6	R 8	We already have these practices in place requiring supervisors to officially sign off on all investigations.	Patti Latsch	Done 03/01/2005			→
F11	R6	We will avoid the use of computer "side systems."	Sam Marshall	Done Ongoing			→
F3	R3	We will develop a quality assurance sampling process to audit completed background checks.	Patti Latsch	Done 9/30/2007	Sep-07		→
F2	L1	We are conducting a second study of the registered counselors' profession.	Bob Nicoloff/ Legislature	Done 11/20/2007	Nov-07		Governor Leg

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F4	R5	We will update training related to disciplinary case tracking after the first internal quality review.	Patti Latsch/ Kirby Putscher	Done 12/10/2007	Nov-07		
F4	R8	We will develop a common case assessment worksheet for use in all Secretary-regulated professions and recommend its use in board/commission-regulated professions.	Patti Latsch	Done 11/30/2007	Nov-07		→
F12	R1	We will complete a business continuity plan to sustain critical investigation and disciplinary activities.	Patti Latsch/ Dave Magby/ Karl Hoehn/ Tracy Auldredge	Done 12/31/2007	Dec-07		→
F12	R2	We will develop an alternative means of contact for key personnel.	Bonnie King/ Eds/ Meghan Young	Done 11/01/2007	Dec-07		→
F2	R3	We will work with the boards to change the administration of the exams for the three professions mentioned in the report	Joy King	Done 12/31/2007	Dec-07		→
F12	R3	We will review disaster recovery plans to make sure there is sufficient information for staff to follow them.	Bonnie King/ Eds/ Credential PMs/ Tracy Auldredge	Done Ongoing	Dec-07		→

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F4	R8	We will develop a common case assessment worksheet for use in all Secretary-regulated professions and recommend its use in board/commission-regulated professions.	Patti Latsch	Done 11/30/2007	Nov-07		
F12	R1	We will complete a business continuity plan to sustain critical investigation and disciplinary activities.	Patti Latsch/ Dave Magby/ Karl Hoehn/ Tracy Auldredge	Done 12/31/2007	Dec-07		→
F12	R2	We will develop an alternative means of contact for key personnel.	Bonnie King/ Eds/ Meghan Young	Done 11/01/2007	Dec-07		→
F2	R3	We will work with the boards to change the administration of the exams for the three professions mentioned in the report	Joy King	Done 12/31/2007	Dec-07		→
F12	R3	We will review disaster recovery plans to make sure there is sufficient information for staff to follow them.	Bonnie King/ Eds/ Credential PMs/ Tracy Auldredge	Done Ongoing	Dec-07		→
F5	R4	We are testing outreach to vulnerable populations, particularly the elderly, based on the results of the Elway Poll.	Michael Wilson/ Meghan Young	Done 08/31/2007	Dec-07		→

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F6	R4	We will complete the contract process for expert review of standard of care cases.	Blake Maresh		Dec-07		
F12	R4, 5	We will have an interim disaster recovery site in operation.	DIRM	Done 12/12/2007	Dec-07		→
F7	R1	We will work with OFM to see whether further action is appropriate to require all boards and commissions to adopt the sanctioning guidelines.	Laurie Jinkins	Done 10/18/2007	Dec-07		→
F4	R2	We will develop specific criteria for imminent danger. (Procedure to be expanded with examples).	Patti Latsch/ EDs	Done 11/01/2007	Feb-08		→
F4	R1	We will provide the threshold list used for Secretary-regulated professions to all boards and commissions for their adoption and use. (Develop check list as part of Procedure 205).	Patti Latsch		Mar-08		→
F10	R1	We will update job descriptions to incorporate quality assurance as we consolidate functions	Sam Marshall		Mar-08		→
F2	R3	We will review the administration of jurisprudence exams with other boards and commissions in the context of their rules and policies	Bonnie King/ Melissa Turner/ Eds/ PMs		Mar-08		→

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F3	R2	We are developing mandatory reporting rules that will include the timeline for reporting unprofessional conduct.	Margaret Gilbert/ Tami Thompson		May-08		
F4	R3	We will evaluate the success of other states' use of multiple complaints to identify incompetent practitioners. We will adopt practice review procedures if there is evidence that they are effective.	Patti Latsch/ Melissa Turner		May-08		→
F4	R4	We will evaluate the success of other jurisdictions' experience with long-term behavioral indicators. If they are shown effective, we will adopt new procedures.	Patti Latsch/ Melissa Turner		May-08		→
F2	R1	We are replacing desk manuals with online procedures.	Patti Latsch		Jun-08		→
F6	R1	We will propose improvements to the process to authorize an investigation.	Patti Latsch/ EDs/ PMs		Jun-08		→
F8	R1	The new computer system will include automated notices and reminders.	Sam Marshall		Jun-08		→
F11	R1, 2	We are implementing the new ILRS computer system that meets agency standards	Sam Marshall		Jun-08		→
F4	R10	We will continue to send notification letters when we assess the complaint. We will look into the cost of additional notifications.	Patti Latsch		Jun-08	Jun-08	

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F2	R2	The new computer system will have checks against errors.	Sam Marshall		Jun-08		→
F2	R2	We will centralize our credentialing work units to promote standard business practices.	Laurie Jenkins		Jun-08		→
F2	R2	We will include audit suggestions and quality assurance pilot project results in revised procedures.	Patti Latsch		Jun-08		→
F9	R3	We will post measures of importance to the public on the agency Web site.	Bonnie King/ Steve Hodgson/ EDs		Jun-08		→
F7	R4	We will review our options to assure accuracy in reporting disciplinary actions. (basis of action)	Patti Latsch		Jun-08		→
F8	R4	A central compliance unit will support consistency in the compliance process.	Laurie Jenkins		Jun-08		→
F11	R5	HPQA is in the midst of analyzing and correcting data in the legacy systems in preparation of the conversion to ILRS. This will continue until the new system is implemented.	Sam Marshall		Jun-08		→

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F4	R9	The database complaint types and closure codes are defined in manuals for the obsolete computer system, ASI. We have reduced the number of complaint types and closure codes for the new system. We have clear definitions for each. The ILRS system will be fully implemented in June 2008.	Sam Marshall		Jun-08		
F6	R9	We will have a single caseload report available for each investigator in the new licensing system.	Sam Marshall		Jun-08		
F3	R5	We are testing a national search service for public criminal conviction records. If it is useful, we will assess costs and consider expanding to all applicants.	Patti Latsch		Jul-08	Jul-08	
F10	R2	We have begun a pilot of a Control Self Assessment in HPQA	Bonnie King/ Josh Shipe/ Charles Satterlund		Sep-08		
F4 F6 F7	R7 R10 R3	We will re-evaluate what should be included in case records and revise our procedures on how to organize and manage records.	Patti Latsch		Sep-08		
F10	R1	We will identify the costs of adding staff to the Department's internal audit function.	Mike Kashmar	DOH Work Done 12/12/2007		Oct-07	

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F2 F6 F8	R1 R6 R4	We will identify necessary resources for a formal training program	Sam Marshall	DOH Work Done 12/12/2007		Oct-07	
F5	R3	We will calculate the cost to redevelop our Web site to focus on customer needs.	Michael Wilson	DOH Work Done 12/12/2007		Oct-07	
F4 F13	R6 R3	We will seek funds to study the feasibility of electronic document management. It will include imaging of complaint files.	Sam Marshall/ DIRM	DOH Work Done 12/12/2007		Oct-07	
F6 F8	R3 R3	A workload standards study is now underway to identify appropriate staffing levels. We will provide the report to the Legislature when it is completed.	Bonnie King/ Megan Davis	DOH Work Done 11/27/2007		Dec-07	
F12	R4	We are working with the Department of Information Services for a primary "hot" site for disaster recovery.	DIRM			Apr-08	
F5	R1, R2	We are developing a public awareness strategy and will identify its costs for the Legislature.	Michael Wilson	DOH Work Done 12/12/2007		Jun-08	

Finding	Rec.	DOH Response	Lead	Done	Done w/ Current Resources	Budget Impact	Needs Legislation
F3	L1	We will follow legislative direction regarding additional authority to conduct background checks.	Mike Kashmar, Julie Miracle, Steve Hodgson/ Dave Magby/ Patti Latsch/ Karen Jensen/ Pam Anderson				Oct-07
F2	L2	We will follow legislative direction regarding registered professions.	Bonnie King/ Melissa Turner	DOH Work Done 12/12/2007			Nov-07
F2	R4	We will follow legislative direction regarding establishing a minimum age for health care professions.	Bonnie King/ Melissa Turner	DOH Work Done 12/12/2007			Nov-07
F6	L1	We will follow legislative direction regarding additional investigative tools.	Patti Latsch/ Karen Jensen				Nov-07
F7	L2	We will follow legislative direction regarding shift of authority for misconduct cases; Secretary disciplines for misconduct, while boards/ commissions continue to discipline standard of care violations.	Legislature				Mar-08
F1	R1	We will follow any legislative direction regarding changes to operating agreements between HPOA and the boards and commissions.	Legislature				Mar-08
F7	L1	We will follow legislative direction regarding requiring a deadline for adoption of sanction guidelines.	Bonnie King/ Margaret Gilbert/ EDs	Done 11/31/2007			N/A
F7	L3	We will follow legislative direction regarding sanction guidelines. (Loss of disciplinary authority if sanction guidelines not adopted).	Legislature	Done 11/31/2007			N/A