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OFFICE OF THE  
**AUDITOR GENERAL**

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DEPUTY AUDITOR GENERAL

May 1, 2015

The Honorable Judy Burges, Chair  
Joint Legislative Audit Committee

The Honorable John Allen, Vice Chair  
Joint Legislative Audit Committee

Dear Senator Burges and Representative Allen:

Our Office has recently completed a 30-month followup of the Arizona Board of Behavioral Health Examiners (Board) regarding the implementation status of the 7 audit recommendations (including sub-parts of the recommendations) presented in the performance audit report released in August 2012 (Auditor General Report No. 12-03). As the attached grid indicates:

- 5 have been implemented;
- 1 is in the process of being implemented; and
- 1 is no longer applicable.

Unless otherwise directed by the Joint Legislative Audit Committee, this concludes our follow-up work on the Board's efforts to implement the recommendations from the August 2012 performance audit report.

Sincerely,

Dale Chapman, Director  
Performance Audit Division

DC:ss  
Attachment

cc: Tobi Zavala, Executive Director  
Arizona Board of Behavioral Health Examiners

Jerri Shields, Chair  
Arizona Board of Behavioral Health Examiners

# Arizona Board of Behavioral Health Examiners

## Auditor General Report No. 12-03

### 30-Month Follow-Up Report

Recommendation	Status/Additional Explanation
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**Finding 1: Board should improve complaint resolution timeliness**

1.1 To ensure that recent changes to the Board’s complaint-handling policies and procedures are improving various aspects of the complaint resolution process, the Board should continue the steps it has taken to (1) screen out complaints that do not need to be opened for investigation, (2) better prioritize complaints on the basis of risk, (3) monitor high-priority complaints, and (4) ensure that complaint data accurately reflect the time it takes to resolve complaints. The Board should further revise these procedures, if necessary, to ensure they appropriately accomplish their intended effect.

**Implemented at 30 months**

1.2 The Board should develop and implement policies and procedures allowing its credentialing committees to dismiss more complaints, and should establish written guidelines regarding (1) the types of complaints that the credentialing committees can dismiss without forwarding for board review and (2) the types of dismissal recommendations the committees should still forward to the Board for review—for example, dismissal recommendations involving high-risk or complex complaints.

**No longer applicable**

Although the Board developed and implemented policies and procedures to allow its credentialing committees to dismiss more complaints, the Legislature passed Laws 2013, Ch. 242, which in part eliminated the credentialing committees’ involvement in complaint investigations, including the authority to dismiss complaints.

1.3 The Board should conduct analyses to determine investigative staffing needs. Specifically, the Board should:

a. Continue to assess the efficiency of its complaint investigation processes. In addition to some steps it has already taken, the Board should continue to identify ways to streamline investigative processes; eliminate tasks, as appropriate; and assign appropriate administrative investigative tasks to support staff;

**Implemented at 30 months**

b. Determine its investigative workload, including an estimate of its future investigative workload, and document the results;

**Implemented at 18 months**

**Recommendation****Status/Additional Explanation**

c. Determine investigative staffing needs and document the results. The Board should conduct separate analyses to identify both its staffing needs and how it can better hire and retain qualified investigators. First, based on ensuring the efficiency of its complaint investigation processes and its workload estimate, the Board should determine how many investigators it needs to process complaints in a timely manner. Second, the Board should determine how it can better identify, hire, and retain qualified investigators.

**Implemented at 30 months**

d. If after completing these analyses and improving its retention of investigative staff the Board determines that additional investigators are needed, the Board may be able to request additional appropriations to use some of its increasing end-of-year fund balance to hire additional staff if needed.

**Implemented at 18 months**

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**Sunset factor #2 The extent to which the Board has met its statutory objective and purpose and the efficiency with which it has operated**

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The Board should continue meeting with stakeholders to discuss their concerns and take actions, as appropriate, to address them.

**Implementation in process**

The Board reported that it has continued to meet periodically with stakeholders. In addition, the Board created a rules subcommittee for the exempt rule-making required by Laws 2013, Ch. 242, which contained provisions that required the Board to address specific stakeholder concerns by either September 2013 or October 2015. The rules subcommittee has met 15 times since January 2014 to discuss and approve proposed rules. These meetings have included calls for public comment, and the subcommittee has considered both written and verbal input from stakeholders. The Board reported that it will implement all of the provisions of Laws 2013, Ch. 242, by October 2015.

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