



REPORT HIGHLIGHTS PERFORMANCE AUDIT

Board should strengthen its policies and procedures for reviewing and approving licenses and certificates

Our Conclusion

The State of Arizona Naturopathic Physicians Medical Board (Board) licenses naturopathic physicians and issues certificates to these physicians, medical assistants, and students participating in training programs. The Board should strengthen its licensing policies and procedures to better ensure that applicants meet all licensing and certification requirements. The Board should also continue to include paper renewal applications in its audits of continuing medical education and develop an electronic mechanism to track its compliance with licensing time frames. Because the executive director investigates complaints but also has authority to dismiss complaints, the Board should have policies establishing when such dismissals are appropriate and have the executive director report on complaint-related actions. In addition, the Board should adopt policies and procedures to guide its disciplinary decisions and timely complaint processing. Finally, the Board should improve the timeliness and accuracy of the information it provides to the public.



2014

As of March 2014, the Board regulated 760 licensed naturopathic physicians, the majority of whom also had a certificate to dispense natural substances, drugs, and devices, and had 14 medical assistant and 315 physician training certificate holders.

Board should strengthen its licensing policies and procedures—The Board's procedures did not ensure that all applicants met licensing/certification requirements. For example, we found an instance where a license application was not placed on a board meeting agenda for the Board's required review and approval. Our review of a sample of six licensure-by-endorsement applications disclosed that one applicant had not met the 3 years of active practice statutory requirement and that for three applicants, the Board did not obtain sufficient documentation to ensure that these applicants met all license requirements. In addition, we reviewed the application files of three preceptorship conduct certificate holders, and the files lacked documentation that the applicants met the certificate requirements.

Board should continue conducting medical education audits of paper renewals—Each licensed naturopathic physician must complete continuing medical education hours and report compliance on his/her license renewal application. A physician may apply for renewal either online or by paper. The Board is required to audit 10 percent of the renewal applications for continuing education compliance. However, the Board had only been auditing the license renewal applications submitted online and not the paper renewal applications. Once we informed the Board of this oversight, the Board began auditing paper license renewals for calendar year 2014.

Board should develop an electronic tracking mechanism—The Board has established time frames for issuing licenses and certificates, as required by law, but the Board does not track its compliance with the time frames. Although the Board processed 56 of the 60 license and certificate applications we reviewed within the overall required time frames, an electronic tracking system would help the Board know whether it is meeting time frames, whether it should address problems that would lead to untimely issuance, and whether it should refund license fees for untimely issued licenses or certificates.

Recommendations

The Board should further strengthen or develop and implement policies and procedures to:

- Ensure that all license applications are placed on the board agenda for approval;
- Ensure that applicants for licensure-by-endorsement and applicants for certificates to conduct preceptorship training programs meet all requirements;
- Continue to ensure that it audits 10 percent of all license renewal applications; and
- Track compliance with licensing and certificate time frames. The Board should also develop and implement an electronic tracking mechanism for doing so.

Board should strengthen its process for handling complaints

Board should implement additional complaint-handling guidance—Between January 2011 and December 2013, the Board opened an estimated 80 complaints. As part of the complaint process, the Board has allowed its executive director to dismiss complaints, but there are no policies and procedures to guide dismissals or require a board review. Such policies and procedures are important because the executive director both investigates and can dismiss complaints without a separate review.

The Board also does not have policies or procedures to guide its disciplinary actions. This type of guidance would help the Board ensure that similar violations receive similar levels of discipline.

Board should develop policies and procedures to guide timely complaint processing—We have found that regulatory boards should resolve complaints within 180 days. In our review of a sample of 19 complaints, the Board took more than 180 days to resolve 15 of them, including 3 that took more than a year. Several factors may affect the Board's complaint resolution timeliness, and the Board does not have policies and procedures for these:

- Time frames for each step of the investigation process, such as when to open a complaint. The Board reported that complaints are usually opened within 30 days of receipt, but five of the complaints we reviewed took much longer to open.
- Prioritizing complaint investigations based on their seriousness. The Board should address the most serious complaints first, based on potential danger to the public.
- Extending the time for a physician to respond to a complaint.
- Tracking complaints through the complaint resolution process.

Board should develop policies and procedures for investigating complaints from other states—The Board has investigated complaints against Arizona licensed naturopathic physicians with allegations that occurred in another state. Although the Board can investigate these complaints, it is not required to do so. Because it has limited resources, the Board should develop and implement policies and procedures that indicate under what circumstances it will investigate a complaint that originates in another state.

Recommendations

The Board should develop and implement policies and procedures to:

- Establish when it is appropriate for the executive director to dismiss complaints;
- Guide the Board's disciplinary actions;
- Help to ensure that the Board resolves complaints in a timely manner; and
- Indicate under what circumstances it will investigate complaints that originate in other states.

Board should improve its provision of public information

During the audit, we placed phone calls to the Board to test how well the Board provides license and complaint information to the public. We asked whether a physician had a complaint or had been disciplined and whether physicians were licensed, and assessed how long the Board took to return messages. In response to these calls, we received some inaccurate complaint information, and inconsistent licensing information. We also had to wait 7 days for the Board to return one of the calls.

Recommendation

The Board should develop and implement policies and procedures for ensuring that it provides accurate and consistent information over the phone and that it quickly returns phone calls.