



STATE OF ARIZONA
BOARD OF BEHAVIORAL HEALTH EXAMINERS
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JANICE K. BREWER
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Executive Director

August 23, 2012

Debbie Davenport, CPA
Auditor General
Office of the Auditor General
State of Arizona
2910 N. 44th Street, Ste. 410
Phoenix, AZ 85018

Dear Ms. Davenport:

On behalf of the Arizona Board of Behavioral Health Examiners, I have attached the agency's response to the Audit Report prepared by your office. The Board and its staff sincerely appreciate the time and resources committed by the audit team to reviewing the Board's processes and procedures. We would also like to recognize the professionalism of your staff throughout the audit process.

The recommendations identified in the report, which have either been implemented or are in the process of being implemented, will allow the Board to continue its ongoing commitment to excellence in the regulation of behavioral health professionals under the Board's jurisdiction and to better fulfill its legislative mandate to protect the public.

Sincerely,

Debra Rinaudo

cc: Arizona Board of Behavioral Health Examiners Members

**RESPONSE TO PRELIMINARY REPORT DRAFT
ARIZONA BOARD OF BEHAVIORAL HEALTH EXAMINERS
AUGUST 23, 2012**

Finding 1:

The Board should improve complaint resolution timeliness.

The Board and its staff recognize the critical importance of resolving complaints in a timely manner and the need for continuous assessment regarding the efficiency of its investigative processes. The Board has already successfully implemented a majority of the recommendations made by the auditors. Likewise, the Board is currently developing the procedures needed to effectively implement the remaining recommendations. Following full implementation of all the recommendations, the Board will be able to determine what additional resources, if any, will be required to allow the Board to process complaints within the 180-day standard used to evaluate Arizona health regulatory boards.

Recommendations:

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.

The finding of the Auditor General is agreed to and the audit recommendation has been implemented. The Board will further revise its new procedures as needed to ensure they appropriately accomplish their intended result.

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.

The finding of the Auditor General is agreed to and the audit recommendation will be implemented. Implementation will be complete by October 2012.

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

The finding of the Auditor General is agreed to and the audit recommendation will be implemented. Implementation will be complete by September 2012.

Sunset Factors:

- Continuing to work with stakeholders to address licensing concerns

The finding of the Auditor General is agreed to and the audit recommendation will be implemented. In response to issues identified by its stakeholders with regard to the Board's licensing requirements and complaint processes, the Board began meeting on a monthly basis in March 2012 with all of its major stakeholders.¹ As a result of these ongoing discussions, the stakeholders reached consensus on a number of issues and the Board was able to implement the requested changes with the full support of the stakeholders. These changes include the following:

- a. **The creation and distribution of detailed information for applicants to clarify the licensing process and help prevent common application errors.**
- b. **The creation of a standardized clinical supervision form for use by applicants seeking independent licensure.**
- c. **The development of a process to provide easier access to information**

¹ The Board's major stakeholders include the Arizona Counselors Association, the Arizona Chapter of the National Association of Social Workers, the Arizona Association of Marriage and Family Therapists, the Arizona Association of Drug and Alcohol Counselors, and the Arizona Council of Human Service Providers.

regarding clinical supervisors who have completed Board required training.

The stakeholders continue to meet on a monthly basis with regard to the remaining issues where consensus has not yet been achieved. The lack of consensus over the remaining issues reflects the differences in professions, employee and employer relationships, competing priorities and implementation costs. The Board remains committed to working with all of its stakeholders to determine if consensus can be reached regarding these outstanding issues.