



Governor
Douglas Ducey

**ARIZONA BOARD OF OSTEOPATHIC EXAMINERS
IN MEDICINE AND SURGERY**

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June 13, 2016

Debra K. Davenport
Auditor General
2910 N. 44th Street, Suite 410
Phoenix, AZ 85018

Dear Ms. Davenport:

The Arizona Board of Osteopathic Examiners in Medicine and Surgery would like to express its appreciation for the opportunity to respond to the recommendations in your recent performance audit of the Board. We would also like to thank you for a thorough and open audit process.

Response to Complaint Resolution Recommendations:

- 1. The Board should continue to implement the measures it adopted to improve complaint resolution timeliness, monitor their effect on resolving complaints in a timely manner, and make changes as needed to its complaint resolution process to ensure that it is as efficient as possible.**

The finding of the Auditor General is agreed to and the audit recommendation will be implemented.
While a majority of the Board's complaints are resolved in a timely manner, the Board and staff are continuously seeking ways to reduce the time in which it takes to resolve complaints. The staff is regularly reviewing our systems to identify areas where timeframes can be reduced and instituting improvements where appropriate.

As recognized in the audit report, several factors can affect the timely resolution of complaints. The Board has exhibited an ongoing commitment and taken steps to improve the timeframe in which it resolves complaints. The Board and staff will continue to seek improvement.

- 2. The Board should assess its investigative staffing needs. This assessment should include a documented workload analysis that compares the Board's workload, including an estimate of future workload, with its staff resources. The Board should then take appropriate action based on the results of this analysis. For example, The Board could use the workload analysis to determine how to maximize its allocated resources**

and/or work with the Legislature to request additional appropriations to hire more staff or contract for additional staff resources as needed to address temporary workload fluctuations, as appropriate.

The finding of the Auditor General is agreed to and the audit recommendations will be implemented.

The Board will initiate a tracking method to account for staff's time to complete an investigation and the time involved in each step of the investigative process. This should allow for us to track the actual time involved in each step of the investigation from beginning until the end. We will also compare our staffing and workload levels to similar regulatory agencies.

Based upon the results, the Board will conduct a workload analysis to include a comparison of the Board's workload, an estimate of future workload, and staff resources. If the analysis supports additional staffing or additional resources, the Board will seek additional funding through the appropriation system. Although the Board has requested additional appropriations in past budget submissions, it has not been successful in obtaining additional funding. With this additional documentation and justification, we will request additional personnel and resources, if supported.

Response to Sunset Factor Analysis Recommendations:

- 1. The Board should revise AAC R4-22-207(A) to allow for the completion of the 40 hours of continuing medical education any time during the 2 preceding years consistent with A.R.S. §32-1825(B).**

The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

A.R.S. §32-1825 was revised during the 2015 legislative session. Due to the rules moratorium and timing of the audit, the Board chose to seek a rules package after completion of the audit process in the event additional recommendations were made. The Board will request an exception to the current rules moratorium and, if approved, begin the process for a rule change.

- 2. The Board should promulgate a rule that specifies the license processing time frames for retired license applications as required by statute.**

The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

The Board will seek an exception to the current rules moratorium and, if granted, begin the process to promulgate rules for the timeframes regarding retired license applications.

Thank you for the opportunity to respond to the audit recommendations. We would also like to commend the audit staff on their professionalism throughout the audit.

Regards,

Jenna Jones
Executive Director