

**Bureau of State Audits' Recommendations 60 Day Status**  
**Chapter 1**  
**May 22, 2008**

<b>Audit Recommendations</b>	<b>Fully Implemented</b>	<b>Estimated Comp. Date</b>	<b>Person(s) Responsible</b>	<b>Exhibit</b>
<p>To ensure that it complies with all Bagley-Keene requirements, the chiropractic board should:</p> <ul style="list-style-type: none"> <li>• Continue to involve legal counsel in providing instruction and training to board members at each meeting.</li> <li>• Continue to retain documentation of the steps it takes to publicly announce its meetings.</li> </ul>	Yes  Yes			A
<p>To ensure that the chiropractic board complies with administrative procedure act requirements, board members should ensure they limit their communications related to board business so they do not engage in ex parte communications or compromise their ability to fulfill their responsibility in enforcement hearings.</p>	Yes			B
<p>To ensure compliance with the initiative act, the chiropractic board should modify its current process so that board members make the final decision to approve or deny all licenses. Additionally, board members should ratify the previous license decisions staff made.</p>	Yes			C
<p>To comply with the political reform act, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Ensure that its filing official is aware of the role and responsibilities and similarly, promptly inform anyone replacing the filing official.</li> <li>• Establish an effective process for tracking whether all designated employees, including board members, have completed and filed their statements of economic interests on time, to identify potential conflicts of interest.</li> <li>• Periodically review its employees' responsibilities to ensure that all individuals who are in decision-making positions are listed as designated employees in its conflict-of-interest code.</li> </ul>	Yes  No  No	  07/01/08  07/01/08	  Executive Officer  Executive Officer	D

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**Chapter 1 (Cont.)**  
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<b>Audit Recommendations</b>	<b>Fully Implemented</b>	<b>Estimated Comp. Date</b>	<b>Person(s) Responsible</b>	<b>Exhibit</b>
The chiropractic board should consider providing state e-mail accounts to its board members so they conduct their chiropractic board business in a secure and confidential environment and make their actions and correspondence accessible under public records act requests.	Yes			F
To ensure that they continue to improve their knowledge and understanding of Bagley-Keene, other state laws, and board procedures, board members should continue to use their newly adopted administrative manual as guidance for conducting board business.	Yes			G
To ensure that it complies with Bagley-Keene requirements and state laws requiring board members to attend training within specific time frames, and to ensure board members receive orientation within a reasonable amount of time of assuming office, the chiropractic board should: <ul style="list-style-type: none"> <li>• Ensure staff retain documentation when they provide a copy of the Bagley-Keene to each board member.</li> <li>• Continue to use the member appointment checklist and establish procedures to periodically record and monitor board member training.</li> <li>• Continue the practice of sending new board members to the orientation that Consumer Affairs provides.</li> </ul>	Yes No Yes	07/01/08	Executive Officer	H

**Bureau of State Audits' Recommendations 60 Day Status**  
**Chapter 2**  
**May 22, 2008**

<b>Audit Recommendations</b>	<b>Fully Implemented</b>	<b>Estimated Comp. Date</b>	<b>Person(s) Responsible</b>	<b>Exhibit</b>
<p>To ensure that it has adequate controls over its complaint review process, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Develop procedures to ensure that the chiropractic board processes and resolves complaints as promptly as possible by establishing benchmarks and more structured policies and procedures specific to each step in its complaint review process.</li> <li>• Establish time frames for staff to open complaint cases, complete initial review, refer cases to an investigator or expert if necessary and close or otherwise resolve complaints through implementing informal discipline or referring for formal discipline to ensure that all complaint cases move expeditiously through each phase of the complaint review process.</li> <li>• Periodically review the status of all open complaints and investigations and identify and resolve any delays in processing.</li> <li>• Strengthen its enforcement policies and procedures to minimize the amount of time it takes staff to process consumer complaints before forwarding them to the attorney general or other law enforcement agency to ensure that it adequately assists attorneys and law enforcement agencies in enforcing the laws of chiropractic.</li> </ul>	No	0801/08	Executive Officer Compliance Manager	
<p>To ensure that its enforcement procedures are complete and provide adequate guidance to enforcement staff, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Develop policies and procedures requiring that only a manager or a designated employee are allowed to make the final decisions on complaint resolution.</li> <li>• Develop procedures to ensure that staff reports the issuance of citations to other states' chiropractic boards and regulatory agencies.</li> <li>• Develop procedures instructing staff when to open and how to process complaints generated internally.</li> </ul>	No	07/01/08	Executive Officer	
	No	08/01/08	Executive Officer Compliance Manager Field Ops. Manager	
	No	08/01/08	Executive Officer	
	No	08/01/08	Executive Officer Compliance Manager Field Ops. Manager	
	No	07/01/08	Compliance Manager	
	No	07/01/08	Compliance Manager	

**Bureau of State Audits' Recommendations 60 Day Status  
Chapter 2 (Cont.)  
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<b>Audit Recommendations</b>	<b>Fully Implemented</b>	<b>Estimated Comp. Date</b>	<b>Person(s) Responsible</b>	<b>Exhibit</b>
To ensure that it processes and resolves consumer complaints regarding the same allegations consistently and that it consistently processes consumer complaints according to its enforcement policies and procedures, the chiropractic board should strengthen its existing procedures to provide guidance for staff on how to process and resolve all types of complaints and to ensure appropriate management oversight.	No	08/01/08	Executive Officer Compliance manager Field Ops. Manager	
<p>To ensure that its processes for prioritizing consumer complaints are adequate and effective to ensure that staff clearly identify and process priority complaints promptly, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Implement tracking methods, such as flagging priority cases during complaint intake, using multiple levels of priority categories, and assigning specific time frames to process those priority categories.</li> <li>• Establish procedures that direct board management to monitor the status of open complaints regularly especially those given priority status, to ensure that they do not remain unresolved longer than necessary.</li> </ul>	No	08/01/08	Executive Officer Compliance Manager	
	No	07/01/08	Executive Officer	
To ensure that it is in compliance with all of its regulations, the chiropractic board should carefully consider the intended purpose of the quality review panels and whether implementing them is the best option to fulfill that intent. If the chiropractic board decides that another option would better accomplish the intended purpose of the quality review panels, it should implement the process for revising its regulations.	Yes			I
To ensure that it has necessary resources to answer technical questions regarding quality of care and improper treatment that often arise, the board should fill and maintain its chiropractic consultant position. In addition, the board should ensure that its chiropractic consultant acts only in an advisory capacity and that the executive officer makes the final decision.	No	12/31/08	Board Members Executive Officer	

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**Chapter 2 (Cont.)**  
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<p>To ensure that it adequately controls the use of experts, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Establish policies and procedures requiring its staff to document interviews with experts, including the content of those discussions to ensure that it refers cases to qualified experts who are free of conflicts.</li> <li>• Consider entering into formal written contracts for services from experts or require them to provide written attestations that they are free of conflicts in cases assigned.</li> <li>• Strengthen its policies and procedures to ensure that its staff monitor experts on their adherence to the established 30-day deadline for reviewing complaint cases and submitting a written report.</li> <li>• Consistently perform an evaluation of the expert's written report and thoroughly document the results of the evaluations to ensure that it does not inappropriately refer complaint cases to experts who have not demonstrated quality work in the past.</li> </ul>	No	08/01/08	Executive Officer Legal Counsel Compliance Manager	J
	Yes			
	No	08/01/08	Executive Officer Compliance Manager	
	No	08/01/08	Compliance Manager	
<p>To ensure that the chiropractic board can demonstrate that its employees meet the minimum qualifications for their positions, it should retain personnel documentation on all employees according to record retention policy. In addition, the chiropractic board should require its personnel contractor to comply with the same requirements.</p>	Yes			
<p>To ensure that future chiropractic consultants are hired with the desired qualifications, the board should consider revising the position's minimum qualifications to provide additional clarity on the term practice of chiropractic, similar to the board's current requirements for experts.</p>	No	01/01/09	Board Members Executive Officer	

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**Chapter 3**  
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<p>To ensure that it is able to measure the overall efficiency of its licensing program in processing applications and petitions, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Establish time frames for all types of applications and petitions the board processes.</li> <li>• Establish a tracking system for applications and petitions to analyze where delays are occurring and ensure that applications and petitions are processed promptly.</li> <li>• Establish a time frame for resolving appeals that includes milestones for each phase of the process.</li> </ul>	No	08/01/08	Executive Officer Licensing Manager	
<p>To ensure that it only licenses those who are committed to following its laws and regulations, the chiropractic board should develop specific policies and procedures for staff to follow when the board has received a complaint against an applicant seeking licensure.</p>	No	08/01/08	Licensing Manager	
<p>To ensure that the chiropractic board is able to defend its decisions on approved applications for satellite offices, corporations, and referral services, it should implement a standard of required documentation that includes identifying when and who conducted eligibility verifications.</p>	No	08/01/08	Licensing Manager	
<p>To ensure that it is placing licenses on forfeiture status according to the initiative act, the chiropractic board should do the following:</p> <ul style="list-style-type: none"> <li>• Establish specific procedures for staff to follow when licensees submit invalid payment when renewing licenses.</li> <li>• Establish a tracking method to ensure that requests for repayment are sent promptly</li> </ul>	No	08/01/08	Licensing Manager	

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**Chapter 3 (Cont.)**  
**May 22, 2008**

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<p>To ensure that the chiropractic board's continuing education program complies with current regulations, it should do the following:</p> <ul style="list-style-type: none"> <li>• Have board members ratify staff approvals of continuing education providers.</li> <li>• Ensure its process to approve continuing education providers conforms with its regulations.</li> <li>• Comply with requirements for notifying providers of board member approval within two weeks following a scheduled board meeting and for notifying providers of application deficiencies within three weeks of receiving the application.</li> <li>• Establish a process to track and monitor whether continuing education providers submit attendance rosters within 60 days of course completion.</li> <li>• Establish a procedure for maintaining accurate documentation of continuing education audits of licensees.</li> <li>• Establish a mechanism to ensure that all relevant steps are taken before continuing education audits are considered complete.</li> <li>• Establish a process to track course audits conducted and a procedure for taking corrective action when the course reviewer identifies a deficiency.</li> </ul>	Yes			L
	Yes			
	No	08/01/08	Licensing Manager	
	No	08/01/08	Licensing Manager	
	No	08/01/08	Licensing Manager	
	No	08/01/08	Licensing Manager	
	No	08/01/08	Licensing Manager	
	No	08/01/08	Licensing Manager	

**End of Report**