



February 24, 2015

Elizabeth Dudek, Secretary Agency for Health Care Administration 2727 Mahan Drive Tallahassee, Florida 32308

Dear Secretary Dudek:

In accordance with Internal Auditing Standards, attached is the 12-month status report from the Florida Center for Health Information and Policy Analysis, Division of Health Quality Assurance in response to Report #13-06, Adverse Incident Report Process published on February 28, 2014. This status report contains information classified as exempt from public records release and/or confidential in accordance with Section 282.318(4)(f), F.S. and thus is not available for public distribution.

To date, management has implemented eight of our 27 recommendations and is progressing on the remaining 19. A detailed description of all issues, recommendations, and management's responses are in the attached table. We will schedule another follow-up review in six months to assess the efforts taken by the Florida Center for Health Information and Policy Analysis to correct all open issues.

If you have any questions regarding this status report, please let me know.

Sincerely.

Eric W. Miller Inspector General

EWM/kv Enclosure

cc: Molly McKinstry, Deputy Secretary, Health Quality Assurance Heidi Fox, Acting Director, Florida Center for Health Information and Policy Analysis Polly Weaver, Chief of Field Operations Michelle Hart, Complaint Administration Unit Supervisor

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Anticipated Completion Date and Contact Name	Full implementation will occur by October 31, 2015. Ryan Fitch and Patricia Vidal	n/a	n/a	December 31, 2015 Patricia Vidal
Twelve-Month Status Update	It has been determined the fining process for late submissions of Adverse incident reports will be nandled by the Enforcement Unit of HOA. The Enforcement \Unit will develop policies and procedures to monitor the timely submission of reports. The procedures will be drafted by June 30, 2015 for approval.	n/a	п/а	Please refer to the status update for finding # 2.
Previous Management Response	RMPS will draft policies to address monitoring of report timeliness and the Request for Sanctions process.	Completed	Completed	Two PSRs have been submitted: PSR411- Rewrite Federal and State NH Adverse Incident Report System and PSR459- SSO for Adverse Incident
Recommendation	We recommend Risk Management Patient Safety (RMPS) develop policies and procedures to monitor the timely submission of reports.	We recommend RMPS consult with the Office of the General Counsel (OGC) to determine if the Agency has statutory authority to fine facilities for submitting their Adverse incident reports after the statutory deadlines and if it does have such authority, fide facilities for late report	We recommend that RMRS and CAU periodically recordile report referrals to ensure that all incidents referred by RMPS are actually received.	We recommend that RMPS document the date reviewed on the hospital form.
Finding	RMPS Did Not Monitor for Timeliness of Report Submission Nor Did They Fine Facilities for Noncompliance with Statutory Deadlines		RMPS Does Not Adequately Document and Track Report Referrals to CAU	
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Anticipated Completion Date and Contact Name		December 31, 2015		Patricia Vidal		December 31,	2015	Patricia Vidal			December 31,	2015		Patricia Vidal			n/a			December 31	2015		Patricia Vidal
Twelve-Month Status Update		Please refer to the status update for finding # 2			0	Please refer to the status update for	finding # 2.				Please refer to the status update for	finding # 2.					n/a			Please refer to the status undate for	finding # 2.	10	
Previous Management Response	Reports.	Two PSRs have been submitted: PSR411 - Re-	write Federal and State NH	Adverse Incident Heport System and PSR459 - SSO	for Adverse Incident Reports.		submitted: PSR411 - Re- write Federal and State NH	Adverse Incident Report	System and PSR459 - SSO	needed for Adverse Incident Reports	Two PSRs have been	submitted: PSR411 - Re-	write Federal and State NH	Adverse Incident Report	needed for Adverse Incident	Reports.	Completed			This notification will be	included in the new online	reporting system.	
Recommendation		We recommend that RMPS request that the ALF form be	modified to include a date of	review.		We recommend that RMPS	request that the NH form	date of review.			We recommend that RMPS	request a field for date of	referral to CAU rather than rely	on staff to post this information in the comments' section for	three forms.		we recommend that HMPS	update the policy outling the	criteria for referring reports to	We recommend that RMPS	consider an automated method	to notify CAU that there is a	report tor review.
Finding											2							-					



Completed

We recommend that CAU add

Finding Recommendation Response fields to their complaint-tracking database to include the date the report was received by CAU, and date the report was received by CAU, and date the report became a complaint, if applicable to the report became a complaint, if applicable to the commend that the Agency Adverse Incident Reports More with DOH to update the Ond work with DOH. We recommend that the Agency Adraft MOU is currently where Not Referral of Litigation of the Chief of Equation Protocol site.) We recommend that the Agency Adraft MOU is currently and the chief date processes to the New System of the Chief of Equation Protocol site.) We recommend that the Agency Adraft MOU is currently where Not Referral or Litigation work with DOH. We recommend that the Agency Adraft MOU is currently work with DOH. We recommend that the Agency System address the Versa System of the Referral of Litigation or the reasoning hospital Ask. The Referral of Litigation or the reasoning hospital Agency and HAD has drafted changes to Appear to Search and HAD reports as welves and HAD reports as welves and HAD reports as welves and HAD reporting System. Not considered the reasoning hospital Agency and HAD has drafted changes to Abeginate the Appear to Search and HAD has drafted changes to Abeginate the Appear to Search and HAD has drafted changes to Abeginate the Appear to Search and HAD reports as welves and HAD reports and HAD reports as welves and HAD reports and HAD														_	
fields to their complaint-tracking database to include the date the report was received by CAU, the date the report was reviewed by CAU and date the report became a complaint, if applicable. Adverse Incident Reports We recommend that the Agency Were Not Referred to MOU to address the security, method, and frequency of report and decess the Versa System address the Versa System security, and HMO reports as welves examine the feasibility of access to HMPS Does and HMO reports as welves and HOA Field Office and HOA Field Office. The Referral of Litigation We recommend frat the Agency Residue session. Begoriting System. The Referral of Litigation We recommend frat the Agency Residual Were and HOA Field Office. HOA has drafted changes to receive and HOA Field Office. Begoriting System. HOA has drafted changes to receive and HOA Field Office. HOA has drafted changes to receive and HOA Field Office. HOA has drafted changes to receive and HOA Field Office. HOA has drafted changes to receive and review the locition to the 2015 of reviewing these documents. Further, if it is determined that the Hoalstide Should continue to the facilities and review the	Anticipated Completion Date and Contact Name		March 31, 2015	Patricia Vidal		n/a				July 1, 2016		Patricia Vidal		September 30,	2015
fields to their complaint-tracking database to include the date the report was received by CAU, the date the report was reviewed by CAU and date the report was reviewed by CAU and date the report became a complaint, if applicable. Adverse Incident Reports Were Not Referred to Work with DOH to update the work with DOH to update the MOU to address the security, method, and frequency of report transfer to DOH. We recommend that the Agency work with DOH technical staff to address the Versa System issues that impede DOH staff from reviewing hospital, ASC, and HMO reports as well-as examine the feasibility of access to the Nursing Homes Reporting System. The Referral of Litigation Recommend that to determine the purpose management to determine the purpose and HQA Field Office management to determine the purpose and reviewing these documents. Further, if it is determined that the receive and review the	Twelve-Month Status Update	140/12	A new MOU draft is routing for review and signature. (This new MOU	includes the updated criteria regarding practitioner involvement referrals and the shared data process via a secure Electronic File Transfer		Completed	Auditor' note: DOH and AHCA now share report information using secure	Electronic File Transfer Protocol.		A legislative proposal related to the	referral of Litigation Notices to the	agency was submitted to leadership for consideration in the 2016 session.		Submitted PSR 598 requesting	electronic filing (e-File system) for submitting Litigation Notices to the
Adverse Incident Reports Were Not Referred to DOH Timely or Securely The Referral of Litigation Notices to RMPS Does Not Appear to Serve a Useful Purpose	Previous Management Response		A draft MOU is currently being reviewed by OGC staff	and the Chief of Field Operations. The MOU will need to be updated again once the new system is	implemented.	Adverse Incident Report	data to be shared with DOH.	1/		HQA has drafted changes to	the current law for the 2015	legislative session.		HQA has drafted changes to	the current law for the 2015 legislative session.
Adverse Incident Report Were Not Referred to DOH Timely or Securely DOH Timely or Securely The Referral of Litigatic Notices to RMPS Does Not Appear to Serve a Useful Purpose	Recommendation	fields to their complaint-tracking database to include the date the report was received by CAU, the date the report was reviewed by CAU and date the report became a complaint, if applicable.	We recommend that the Agency work with DOH to update the	MOU to address the security, method, and frequency of report transfer to DOH.	W. Carlotte Land Comment of the Comm	work with DOH technical staff to	address the Versa System issues that impede DOH staff	from reviewing hospital, ASC,	examine the feasibility of access to the Nursing Homes	We recommend that the Florida	Center consult with OGC, CAU,	mine the	purpose and intended results of reviewing these documents.	Further, if it is determined that	receive and review the
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THE RESERVE OF THE PERSON OF T	Finding	Recommendation	Previous Management Response	Twelve-Month Status Update	Anticipated Completion Date and Contact Name
		documents, we recommend that the Florida Center finalize a policy that includes how staff should record, at a minimum, from whom they received the document, the date received by RMPS, the date of review by RMPS, and the action taken by RMPS such as a referral.		Agency. This system will accommodate the current need to receive and review the Litigation Notices. It will allow the documents to be scanned directly into Laserfiche and generate a report for tracking purposes.	Patricia Vidal
	The Receipt and Review of Annual Reports from Facilities Does Not Appear To Be a Cost Effective Use of Agency Resources	We recommend that Agency management determine the benefit of requiring facilities to submit annual reports. If Agency management determines that the annual report requirement is not useful or cost beneficial to either the Agency or facilities, we recommend that the law be revisited.	HQA has drafted clanges to the current law for the 2015 legislative session.	A legislative proposal recommending deleting the requirement for facilities to send the annual reports to the Agency was submitted to leadership for consideration in the 2016 session.	July 1, 2016 Patricia Vidal
		We recommend that RMPS publish the required malpractice claims statistics for bospitals and ASCs as required by law.	Completed	n/a	n/a
	Some Agency Rules, Policies and Forms Regarding Adverse Incidents are Outdated	We recommend the Florida Center continue to update and align the rules, policies, and forms with current statutory provisions regarding Adverse incidents and ensure congruence among these documents.	RMPS is currently in the process of updating and aligning rules, policies, and forms with current statutory provisions regarding Adverse incidents to ensure congruence among these documents.	RMPS is currently in the process of updating and aligning rules, policies, and forms with current statutory provisions regarding Adverse Incidents to ensure congruence among these documents.	December 31, 2015 Patricia Vidal

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Office of Inspector General - Internal Audit Agency for Health Care Administration

Report Title: Twelve-Month Status Report on Adverse Incident Reporting Process Report #: 15-14

No.

Completion Date and Contact Anticipated Name Twelve-Month Status Update A HOLDING WINDOWN SOUNDING **Previous Management** Response Recommendation Finding