



RICK SCOTT
GOVERNOR

ELIZABETH DUDEK
SECRETARY

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



Agency for Health Care Administration
 Office of Inspector General – Internal Audit
 Report Title: Twelve-Month Status Report on Adverse Incident Reporting Process
 Report #: 15-14

No.	Finding	Recommendation	Previous Management Response	Twelve-Month Status Update	Anticipated Completion Date and Contact Name
1	RMPS Did Not Monitor for Timeliness of Report Submission Nor Did They Fine Facilities for Non-compliance with Statutory Deadlines	<p>We recommend Risk Management Patient Safety (RMPS) develop policies and procedures to monitor the timely submission of reports.</p> <p>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, fine facilities for late report submission.</p>	<p>RMPS will draft policies to address monitoring of report timeliness and the Request for Sanctions process.</p> <p>Completed</p>	<p>It has been determined the fining process for late submissions of Adverse Incident reports will be handled by the Enforcement Unit of HCA. 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.</p> <p>n/a</p>	<p>Full implementation will occur by October 31, 2015.</p> <p>Ryan Fitch and Patricia Vidal</p> <p>n/a</p>
3	RMPS Does Not Adequately Document and Track Report Referrals to CAU	<p>We recommend that RMPS and CAU periodically reconcile report referrals to ensure that all incidents referred by RMPS are actually received.</p> <p>We recommend that RMPS document the date reviewed on the hospital form.</p>	<p>Completed</p> <p>Two PSRs have been submitted: PSR411- Re-Adverse Incident Report System and PSR459- SSO for Adverse Incident</p>	<p>n/a</p> <p>Please refer to the status update for finding # 2.</p>	<p>n/a</p> <p>December 31, 2015 Patricia Vidal</p>

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No.	Finding	Recommendation	Previous Management Response	Twelve-Month Status Update	Anticipated Completion Date and Contact Name
		We recommend that RMPS request that the ALF form be modified to include a date of review.	Reports. Two PSRs have been submitted: PSR411 - Re-write Federal and State NH Adverse Incident Report System and PSR459 - SSO for Adverse Incident Reports.	Please refer to the status update for finding # 2.	December 31, 2015 Patricia Vidal
		We recommend that RMPS request that the NH form include a date of receipt and date of review.	Two PSRs have been submitted: PSR411 - Re-write Federal and State NH Adverse Incident Report System and PSR459 - SSO needed for Adverse Incident Reports.	Please refer to the status update for finding # 2.	December 31, 2015 Patricia Vidal
		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 all three forms.	Two PSRs have been submitted: PSR411 - Re-write Federal and State NH Adverse Incident Report System and PSR459 - SSO needed for Adverse Incident Reports.	Please refer to the status update for finding # 2.	December 31, 2015 Patricia Vidal
		We recommend that RMPS update the policy outlining the criteria for referring reports to CAU.	Completed	n/a	n/a
		We recommend that RMPS consider an automated method to notify CAU that there is a report for review.	This notification will be included in the new online reporting system.	Please refer to the status update for finding # 2.	December 31, 2015 Patricia Vidal
		We recommend that CAU add	Completed	n/a	n/a

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4	<p>Adverse Incident Reports Were Not Referred to DOH Timely or Securely</p>	<p>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.</p> <p>We recommend that the Agency work with DOH to update the MOU to address the security, method, and frequency of report transfer to DOH.</p>	<p>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.</p> <p>Submitted PSR524 - NH Adverse Incident Report data to be shared with DOH.</p>	<p>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 Protocol site.)</p> <p>Completed</p> <p>Auditor' note: DOH and AHCA now share report information using secure Electronic File Transfer Protocol.</p>	<p>March 31, 2015</p> <p>Patricia Vidal</p> <p>n/a</p>
5	<p>The Referral of Litigation Notices to RMPS Does Not Appear to Serve a Useful Purpose</p>	<p>We recommend that the Florida Center consult with OGC, CAU, and HQA Field Office management to determine the purpose and intended results of reviewing these documents.</p> <p>Further, if it is determined that RMPS should continue to receive and review the</p>	<p>HQA has drafted changes to the current law for the 2015 legislative session.</p> <p>HQA has drafted changes to the current law for the 2015 legislative session.</p>	<p>A legislative proposal related to the referral of Litigation Notices to the agency was submitted to leadership for consideration in the 2016 session.</p>	<p>July 1, 2016</p> <p>Patricia Vidal</p> <p>September 30, 2015</p>

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		<p>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.</p>		<p>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.</p>	<p>Patricia Vidal</p>
6	<p>The Receipt and Review of Annual Reports from Facilities Does Not Appear To Be a Cost Effective Use of Agency Resources</p>	<p>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.</p>	<p>HQA has drafted changes to the current law for the 2015 legislative session.</p>	<p>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.</p>	<p>July 1, 2016 Patricia Vidal</p>
7	<p>Some Agency Rules, Policies and Forms Regarding Adverse Incidents are Outdated</p>	<p>We recommend that RMPS publish the required malpractice claims statistics for hospitals and ASCs as required by law. 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.</p>	<p>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.</p>	<p>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.</p>	<p>n/a n/a December 31, 2015 Patricia Vidal</p>

