

PERFORMANCE AUDIT REPORT

Assessing the Extent to Which License Applications and Renewals Are Delayed at the Behavioral Sciences Regulatory Board

**A Report to the Legislative Post Audit Committee
By the Legislative Division of Post Audit
State of Kansas
April 1997**

Legislative Post Audit Committee

Legislative Division of Post Audit

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EXECUTIVE SUMMARY

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Question 1: To what extent are there unwarranted delays in the Board's handling of license applications and renewals?

On average, new licenses were issued within 77-197 days of the dates the applications were first submitted. page 4
To determine how long it took the Board to issue new licenses, we compared the dates applications were submitted with the dates licenses were issued for all applications filed in fiscal year 1996. For most new licenses, the licensing process took an average of 4-6 months.

In general, most delays in licensing weren't caused by the Board's staff. page 5
We looked in-depth at 21 license applications that were among those that took the longest to process in 1996.

- *In 13 of the 21 cases, it took a long time for the applicant, references, or schools to submit all application materials the Board needed to review for licensure.*
- *In 11 of the 21 cases, the applicant had to wait several weeks or months until the next scheduled exam date.*
- *In two of the 21 cases, health problems and car trouble prevented the applicant from taking a test, or otherwise kept the applicant from satisfying all the conditions for being granted a license.*
- *In one case the applicant moved and didn't provide the Board with a forwarding address for more than a year.*

In five of the 21 cases we reviewed, we found delays that were attributable to the Board's staff. page 6
In one of our sample cases, processing was delayed for about two and a half months because the Board's staff didn't realize they already had all the needed application materials. Once the mistake was discovered, the applicant was licensed within five weeks.

In four other cases in our sample, the applicants weren't informed about Board decisions on a timely basis. In two cases, the applicants waited 113 calendar days, or about four months, for the Board's staff to inform them of the Board's decisions regarding their application for licensure. In the other two cases, the time lag between the Board's decision and the date the applicant was notified was 42 days and 51 days.

Board staff told us it was their policy to notify applicants of Board actions no later than 45 business days (or about 63 calendar days) after the action took place. Although this seems like a long time to us, Board staff said that with their current workload and staffing constraints, it wasn't always possible to send notifications sooner than that.

Based on our limited review, we didn't find major problems with delays in processing license renewals. page 10
We reviewed a sample of 15 professional licenses that were renewed in 1996 to determine whether there were any delays, and whether those delays could be attributable to the licensee or the Board. We found only two cases where the Board mailed out the license certificate after the previous certificate's expiration date. However, the newly issued licenses were effective as of the date the previous certificate had expired.

It appears that the Board has taken steps to speed up the licensing process. page 10
Beginning in fiscal year 1996, the Board started to meet monthly rather than quarterly. This change should decrease the time lag between application materials received and the Board taking action on the application for licensure. In addition, since February 1996, license applications for doctorate-level psychologists are only reviewed by the two doctorate-level psychology Board members, rather than the whole Board. Only those applications with problems are reviewed by the whole Board. We noted this practice appeared to have shortened the time for licensing Ph.D. psychologists by up to four weeks. Finally, the frequency of tests for social workers was increased from quarterly to weekly. This change should decrease the time an applicant would have to wait to take an exam and get his or her social worker's license.

The Board's processes could be speeded up even further if it had computers like the Board of Healing Arts and the Board of Nursing. For example, officials at the Board of Nursing told us their computer system automatically generates letters to let applicants know such things as when their applications have been received, when all application materials have been received, and when test scores have been received.

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This audit was conducted by Trish Pfannenstiel and Tracey Elmore. If you need any additional information about the audit's findings, please contact Ms. Pfannenstiel at the Division's offices. Our address is: Legislative Division of Post Audit, 800 SW Jackson Street, Suite 1200, Topeka, Kansas 66612. You also may call (913) 296-3792, or contact us via the Internet at: **LPA@mail.ksleg.state.ks.us**.

Assessing the Extent to Which License Applications and Renewals Are Delayed at the Behavioral Sciences Regulatory Board

The Behavioral Sciences Regulatory Board licenses qualified social workers, psychologists, professional counselors, and marriage and family therapists, and certifies alcohol and drug abuse counselors. In addition, the Board reviews and approves continuing education courses and requirements, establishes practice standards, and regulates these professional groups. The Board is empowered, after due process, to limit, suspend, refuse to renew, or revoke the right of any licensee or registrant to practice in Kansas. The agency has a staff of 6.5 full-time-equivalent employees to perform these activities, and reports to an 11-member Board appointed by the Governor.

Legislative concerns have been raised about reported delays by the agency in issuing new licenses, handling license renewals, scheduling hearings, and notifying applicants regarding the status of their applications, renewals, or appeals.

This 100-hour performance audit answers the following question:

To what extent are there unwarranted delays in the Board's handling of license applications and renewals?

To answer this question, we interviewed Board staff about their procedures for handling license applications, and reviewed the dates applications were submitted and licenses were issued for fiscal year 1996. We did a more detailed file review for a sample of applications and renewals that took a long time to process. Finally, we contacted officials at the Kansas Board of Healing Arts and the Kansas Board of Nursing to learn about their licensure processes.

In conducting this audit, we followed all applicable government auditing standards set forth by the U.S. General Accounting Office. Our findings for this audit begin on page four, after a brief overview of the Kansas Behavioral Sciences Regulatory Board.

Overview of the Behavioral Sciences Regulatory Board

The Behavioral Sciences Regulatory Board was established in 1980 to license and regulate psychologists and social workers in Kansas. It took over the responsibilities of the State Board of Examiners of Psychologists and the Board of Social Work Examiners. Those responsibilities have increased over the years, to include the following six licensed professions:

Year Added	Professions Regulated by the Board
1980	Psychologists (Ph.D.) and Social Workers
1989	Professional Counselors
1990	Masters Level Psychologists
1994	Marriage and Family Therapists
1996	Alcohol and Drug Abuse Counselors

Alcohol and Drug Abuse Counselors are registered rather than licensed by the Board. For ease of description, no distinction is made between professions that are licensed or registered in the remainder of this report.

The Board originally comprised seven members. In 1996, the Legislature increased the Board to 11 members: two licensed psychologists, two licensed social workers, one professional counselor, one marriage and family therapist, one licensed masters level psychologist, and four members from the general public. All Board members are appointed by the Governor and generally serve a four-year term.

In addition to licensing the six professions listed above, the Board's powers, duties, and functions include the following:

- recommending prosecution for violations of State law and/or regulations by those professionals licensed by the Board
- compiling and publishing an annual list of the names and addresses of all persons licensed by the Board
- prescribing the form and content of examinations required for licensure
- adopting and enforcing rules and regulations relating to:
 - practitioners' professional conduct
 - continuing education requirements
 - classes of social work specialties
 - examination procedures
- adopting rules and regulations as may be necessary for the administration of the Board

The Board also appoints an executive director who oversees the administrative duties of the Board.

The Board Is Funded Through License Fees Collected From Various Professions

The Board receives no General Fund moneys. Licensing fees range from \$100 for a social worker's license to \$200 for the renewal of a doctorate-level psy-

chologist's license. Most professional licenses are issued for a two-year period. The table below shows the number of professionals licensed by the Board as of July 1, 1996.

**Behavioral Sciences Regulatory Board
Licensed Professionals**

Profession Licensed	# Licensed 7-1-96
Psychologists (Ph.D.)	522
Masters Level Psychologists	397
Social Workers	4,935
Professional Counselors	156
Marriage & Family Therapists	314
Alcohol & Drug Counselors	<u>75</u>
Total	6,399

**Applicants for a License Must Meet a
Number of Requirements**

Generally, to obtain a new license from the Board, an applicant must submit an application form, transcripts, references, supervisor's attestation about work experience, proof of graduation, and an application fee. Generally, first-time applicants in Kansas also are required to take and pass a national examination, and provide that information to the Board. For some applicants who've already been licensed in another state, the applicant also must provide that state's licensing laws and regulations.

After all application materials are received, Board staff review them. Based on that review, the staff identify concerns that need to be addressed or make a recommendation to the Board or its appropriate professional members that the individual be considered for licensure. Board staff can issue social worker licenses and alcohol and drug abuse counselors registrations to eligible applicants. For other professions, such as licensed professional counselors and licensed marriage and family therapists, the advisory committees, chaired by various Board members, can instruct staff to issue the license to eligible applicants, or make recommendations to the Board concerning the applicant's eligibility.

To renew a license, an applicant must submit a renewal application, proof of required continuing education hours, and a renewal fee 30 days before his or her current license expires.

Only those applications with problems are reviewed by the full Board for a final decision. Board staff or advisory committee members may recommend that an application for licensure be approved, denied, or tabled until additional information is provided. The only applications reviewed by the full Board are those that were recommended to be denied or tabled. Applicants who are denied a license have 15 days to request a hearing on the Board's decision.

To What Extent Are There Unwarranted Delays In the Board's Handling of License Applications and Renewals?

Although it took an average of 77-197 days for most new licenses to be issued in fiscal year 1996, most of this delay wasn't the result of any inaction by the Board's staff. We reviewed 21 files that were among those cases that took the longest to process. In three-fourths of the 21 cases we reviewed in-depth, delays were caused by applicants submitting incomplete applications, failing to show up for exams, not passing the exam, not complying with licensing requirements, and the like. We found five cases in which delays appeared to be attributable to the Board's staff. These cases appeared to be exceptions. Board staff indicated the Board's review of several cases occurred during a very busy time, and a few of these cases slipped through the cracks. Finally, we reviewed a sample of renewal files, and didn't find a significant problem with unwarranted delays. These and related findings are discussed in the sections that follow.

On Average, New Licenses Were Issued Within 77-197 Days Of the Dates the Applications Were First Submitted

To determine how long it took the Board to issue new licenses, we compared the dates applications were submitted with the dates licenses were issued for all applications filed in fiscal year 1996. The table below shows the results of our review. In this table, and throughout the report, information is reported in calendar days, unless noted otherwise.

**Length of Time To Issue a New License
For Applications Submitted in Fiscal Year 1996**

<u>Profession</u>	<u>Number of Applications</u>	<u>Number of Calendar Days To Issue License</u>		
		<u>Average Days</u>	<u>Least Days</u>	<u>Most Days</u>
Psychologists (Ph.D.)	39	162	52	417
Masters Level Psychologists	40	77	14	177
Social Workers	516	181	0	525
Professional Counselors	6	197	90	245
Alcohol & Drug Counselors	<u>71</u>	122	0	280
Total	672			

- (a) The Board also licensed nine Marriage and Family Therapists in this same time period. The average time for a license to be issued was 433 days. However, this average wasn't typical because the Board didn't have access to the national examination for this license until May 1996, which held up the licensing process.

The table shows that, for most new licenses, the licensing process took an average of 4-6 months. Within a profession, some licenses were issued in a relatively short period of time, while others took a long time to be issued. For example, it took anywhere from 52 to 417 days to issue a psychologist's license.

In General, Most Delays in Licensing Weren't Caused by the Board's Staff

To determine why it took so long for licenses to be issued, we looked at the Board's general process for issuing a license for each profession. We also looked in-depth at 21 license applications that were among those that took the longest to process. Our 21 cases included 10 psychologists, five social workers, two masters level psychologists, two professional counselors, and two alcohol and drug abuse counselors. We focused most of our review on the psychologists' (Ph.D.) licenses because legislators had received complaints about licensing delays from some members of this profession.

Most factors that contributed to the delays we saw in our sample weren't within the control of the Board's staff. Each profession goes through a somewhat different process to obtain a license, so the factors that can affect how quickly each type of license is issued can vary. The problems we found in our review that weren't related to any action or inaction by the Board or its staff are described below. (Some applicants had problems in more than one area.)

- ***For 13 of the 21 cases we reviewed, it took a long time for all application materials to be submitted.*** Before the Board will act on a license application, all application materials and fees must be submitted. Those materials vary somewhat for each profession, but the types of things required generally include educational transcripts, references, supervisor's attestation about work experience, test scores, and the like. On average, for the applications we reviewed in this audit, it took about two months for the Board to receive all materials. Sometimes, however, it took significantly longer for all the required materials to come in, often because people failed to return letters of reference on the applicant's behalf. Some examples...

.....one social worker's application came in June 16, 1994. However, one of her references didn't return the reference form to the Board until September 5, 1995. In this case, the Board notified the applicant three times that this reference hadn't yet been submitted. Once the Board received this reference, the applicant was licensed that same day. (The Board allowed her to sit for the June 1995 exam even though all her application materials weren't in.) Because of the delay in receiving the reference, this social worker's license took 446 days, or almost 15 months, to be issued.

.....another social worker submitted an application February 17, 1995, but she didn't graduate until December 1995. The Board allowed her to sit for the exam in June, even though she hadn't yet graduated. The Board got her transcripts February 9, 1996, and issued a license effective that same day. In this case, nearly a year passed between the application and licensing dates.

- ***For 11 of the 21 cases we reviewed, applicants had to wait until the next scheduled exam.*** For example, to obtain a doctorate-level psychologist license, an applicant must take a national exam that is administered only twice a year—in April and October. And, if an applicant misses or fails the exam, he or she has to wait until the next time the exam is offered. Some examples of what we saw....

.....one psychologist's application came in to the Board May 17, 1996. The first available chance this applicant had to take the exam was October 16, 1996. That caused an automatic delay of five months. The Board got the results of the exam November 22, or more than five weeks later, and issued a license effective that same day. The total result was a delay of more than six months.

.....another psychologist's application came in October 2, 1995. The first available exam date was April 17, 1996. However, the applicant missed the exam, and had to wait until October 1996 to take it. She took the October exam, and the Board received her test results in November. This applicant got her license effective November 22, 1996, which was 417 days, or almost 14 months, after she first applied.

.....a psychologist's application was submitted July 5, 1995. He took the exam in October, but didn't pass. He had to wait until April 1996 to take the exam again. The Board received the test results from the April exam May 22, and issued a license effective that same day. The total length of time for this applicant to receive his license was 322 days or almost a year.

- ***In two cases we reviewed, circumstances beyond the applicant's control caused delays in the licensing process.*** Here's what happened ...

.....one social worker experienced car trouble on the way to take the exam, missed the exam, and had to wait another three months until the next regularly scheduled testing date.

.....another social worker developed medical problems that caused her to miss two exam dates and delay her graduation. As a result, her licensing process took a total of 525 days, or almost a year and a half.

- ***In one case we reviewed, the applicant had moved but hadn't informed the Board of her new address.*** Here's what happened in this case...

.....the applicant moved after submitting an application in July 1994. This applicant didn't send the Board a correct address for more than a year after she'd submitted her application. The Board tried several attempts to reach this applicant at different addresses—including her last known address and place of employment—without success.

In Five of the 21 Cases We Reviewed, We Found Delays That Were Attributable To the Board's Staff

A number of things within the Board's control can contribute to delays in processing or issuing a license. They include the following circumstances:

- The applicant has submitted all the necessary materials, but the Board's staff doesn't process the application and schedule a review by the Board, or one of its advisory committees, on a timely basis
- The Board's staff doesn't notify the applicant in a timely manner that the application materials haven't been received, so the application can't be processed. (This is not a requirement.

Board staff indicated they'll notify an applicant about missing materials if they have time. Neither the Board of Healing Arts nor the Board of Nursing indicated they did this.)

- The Board's staff doesn't provide the applicant with timely notification of a Board decision, so that the applicant can take the next appropriate step, such as requesting a hearing on the Board's decision.

In the 21 cases we reviewed, we found a number of things the Board was doing to expedite the issuance of a license. For example, in five cases the Board reviewed the applicant's request for licensure before receiving all the needed application materials. Board staff told us this was done so these applicants could sit for an exam or receive a license at the earliest possible date. We also noted that although the applicant is responsible for making sure that needed materials are submitted to the Board, in 14 cases the Board notified applicants about missing materials that could slow the processing of their licenses. Finally, we found that in most cases, the Board's staff notified the applicants about Board decisions within 16 days or less.

However, we did find five cases in which actions by the Board's staff contributed to delays in processing or issuing a license. Those cases are discussed below.

In one of our sample cases, processing was delayed for about 2.5 months because the Board's staff didn't realize they already had all the needed application materials. Board staff told us that after an application is complete they generally schedule a review at the next monthly Board meeting if the agenda allows it. In this case, an applicant for a psychologist's license provided all the necessary materials to the Board by July 29, 1996. Board staff apparently thought the applicant's transcripts still were missing and didn't act until October 1996 when they sent a notice about the missing transcript to the applicant. Once the mistake was discovered, the applicant was licensed effective November 18, 1996. The Board held two meetings prior to the Board's review of this applicant. Had staff realized they had all the necessary materials, this applicant likely would have gotten his license a couple of months earlier.

In four other cases in our sample, the applicants weren't informed about Board decisions on a timely basis. In these four cases, the Board didn't notify the applicants for time periods ranging from 1.5 months to 4 months.

Two applicants' requests for licenses were considered at a February 1996 Board meeting, but Board staff didn't notify the applicants about Board actions until June 1996, or 113 days later. Once notified of the Board's decision, one applicant requested a hearing with the Board before the two-week appeal deadline. The appeal was heard in September, and he was granted a license by the Board that same month. Had he been informed about the Board's February decision on a timely basis, he would have been able to file an appeal several months sooner. More information about this case is provided in the box on pages eight and nine.

Consideration of the second applicant's license was tabled by the Board at the February meeting because the applicant hadn't supplied all the required materials. After she was notified in June, the applicant supplied the needed materials and was licensed effective August 12. If this applicant had been notified sooner, she could have provided the missing materials in the Spring of 1996, and likely would have gotten her license several months sooner.

Out-of-State Psychologist Has Problems Obtaining a Kansas License

One of the concerns that led to this audit was the Behavioral Sciences Regulatory Board's handling of a request for licensure from a psychologist (Ph.D.) who was licensed in another state, and applied for a license in Kansas. The psychologist had accepted a job in Kansas, and needed a Kansas license to practice at the facility. However, the licensing process in this case took 11 months.

The following is a chronology of events in this psychologist's licensure by the State. Those items listed in bold indicate correspondence from the Board to the applicant.

- | | |
|-----------------|---|
| 10-06-95 | The Board received the psychologist's application. |
| 10-11-95 | The Board received transcripts from the state where the psychologist had received a degree. |
| 10-17-95 | The Board mailed forms to the psychologist's references for them to complete and return to the Board. |
| 10-24-95 | <i>The Board notified the psychologist that his application had been received.</i> |
| 10-28-95 | The Board received notification from the state where the psychologist had most recently worked that it wouldn't release the state's records of the psychologist's licensure without a fee being paid. |
| 11-02-95 | The Board received a reference for the applicant. |
| 11-06-95 | <i>The Board notified the applicant about the state wanting a fee before it would release his licensure records.</i> |
| 11-13-95 | The Board received two references for the applicant. |
| 12-18-95 | The Board received records from the state including verification of the applicant's licensure in that state and copies of that state's regulations regarding licensure for psychology. |
| 01-09-96 | <i>The Board notified the applicant that the Board hadn't received all application materials but that the Board still would be reviewing the application at the February 12, 1996, meeting. (The application was missing a supervisor attestation form and the applicant's test scores.)</i> |
| 01-12-96 | The Board received another reference for the applicant. |
| 01-12-96 | The Board's staff sent the applicant's materials to the Board's Psychology Advisory Committee for review. |
| 01-22-96 | The Board received a copy of a memo the applicant sent to his former supervisor requesting that the supervisor send a reference to the Board. |
| 01-24-96 | <i>The Board notified the applicant that the supervisor attestation was still missing from his application materials.</i> |
| 01-25-96 | The Board received test scores from the state where the applicant had been licensed. The applicant's score was 65%; Kansas' minimum test score requirement for licensure is 70%. |
| 02-01-96 | The Board's staff sent additional application materials to the Board's Psychology Advisory Committee for review. |
| 02-12-96 | The Board reviewed the applicant's request for licensure. The Board denied the request because of problems with the applicant's education, test score, and the fact that the supervisor attestation still was missing. (The applicant was invited to attend this meeting to hear the Board's discussion of his application, but he didn't.) |

04-08-96	The Board received a phone message from the applicant's Kansas employer wondering what could be done to correct the deficits of the applicant so he could be licensed in Kansas.
05-31-96	The Board received a letter providing information about the program where the applicant had completed his education. The applicant graduated from a program that wasn't accredited. (It became accredited later.)
06-04-96	<i>The Board sent the applicant a summary order stating that the application had been denied at the February Board meeting. The order explained why the Board denied the application and cited the statutes and regulations supporting the Board's denial.</i>
06-05-96	The Board received a letter from the applicant's employer informing the Board of the applicant's frustration at not receiving feedback about the status of his application.
06-18-96	The applicant sent a memo to the Board requesting a hearing about his application.
07-01-96	<i>The Board sent the applicant the information it had received from the university he graduated from.</i>
07-16-96	The Board received a letter from the applicant with a request to appeal the Board's denial of his application for licensure in Kansas.
08-16-96	<i>A member of the Board's Psychology Advisory Committee sent a letter to the applicant informing him of the education deficiencies in the program he graduated from, and of his lower-than-allowed test score.</i>
08-21-96	<i>The Board sent the applicant a letter informing him that the Board would hear his appeal at the Board's 9-8-96 meeting.</i>
08-22-96	The Board received a letter from the applicant requesting written notification about the hearing date for his appeal.
09-08-96	The Board approved the applicant's request for licensure after meeting in executive session. State law gives the Board the authority to "grant a license without examination to any person who, at the time of application, is licensed or certified by a board of psychology examiners of another state if the requirements of such state for such certification or licensure are substantially the equivalent of the requirements" of Kansas.
09-12-96	<i>The Board notified the applicant that his license had been approved by the Board with an effective date of 9-9-96 to expire on 6-30-98.</i>

After the Board's decision to license this psychologist, one of the two licensed psychology Board members sent a letter of resignation to the Governor. The Board member stated in the letter that because of the licensure of this particular psychologist the Board has "demeaned each licensed psychologist who has successfully satisfied the psychology licensure statutes and also disregarded its responsibilities to the citizens of Kansas."

In addition, the Governor received a letter from the Kansas Psychological Association that expressed its concerns "that a candidate for licensure did not meet the requirements as set forth in Psychology Statutes, but was licensed by the Behavioral Science Regulatory Board. This individual did not meet the educational requirements nor the cutoff percentage score on the national psychology exam."

In response to these two letters, a Board member wrote the Governor to defend the Board's actions. He said the Board's decision to license this psychologist was "correct under the law." He explained that the critical issue regarding this psychologist's licensure was the fact that his test score was below 70%. But, the Board member said, the psychologist's "credentials indicated more than adequate training and experience since receiving his Ph.D." This Board member noted that K.S.A. 74-5310 doesn't require applicants "to pass an exam if he or she has the necessary training and experience and therefore the portion of K.A.R. 102-1-4 which requires all applicants to pass the exam is void." The Board member recommended that members of the psychology profession who feel "the law, as written, permits unqualified individuals to be licensed," should "ask the legislature to change the statute."

In the other two cases, the time lag between the Board's decision and the date the applicant was notified was 42 days and 51 days. In one of these cases, the applicant just needed to clear up some questions about his work experience. Once he was notified, he provided the information and received a license.

In the other case, the Board's staff didn't notify a Masters Level Psychologist that she was eligible to apply for a temporary license while the Board was considering her permanent license. She applied for, and was granted, a temporary license soon after she was notified.

Board staff told us it was their policy to notify applicants of Board actions no later than 45 business days (which is about 63 calendar days) after the action took place. Although this seems like a long time to us, Board staff said that with their current workload and staffing constraints it wasn't always possible to send notifications sooner than that. They added that it rarely takes that long, and that they make every effort to send notifications out as soon as possible. From our file review, this appears to be true.

Based On Our Limited Review, We Didn't Find Major Problems With Delays in Processing License Renewals

To renew a license, the licensee must complete a renewal form, submit proof that continuing education requirements have been met, and submit the appropriate fee 30 days before his or her license expires. Board staff told us that once they receive these items, they can issue a new license without any formal Board action.

We reviewed a sample of 15 professional licenses that were renewed in 1996 to determine whether there were delays in renewing them, and whether those delays could be attributable to the licensee or the Board.

From our sample, we found only two cases that were somewhat problematic. Both were renewals of psychologist's licenses. The Board sent out a letter to all licensed psychologists on March 25, 1996, notifying them their licenses would expire June 30, and informing them about the materials they needed to provide for renewal. Two of the licenses in our sample weren't issued until 19 days after the expiration date shown on the previous license, even though the licensees had provided the needed materials well in advance. The newly issued licenses were effective July 1, the day after the previous licenses expired.

It Appears That the Board Has Taken Steps To Speed Up the Licensing Process

Board staff told us that recent changes made by the Board should help decrease the time an applicant must wait to be licensed in Kansas. First, beginning in fiscal year 1996, the Board started to meet monthly, rather than quarterly. More frequent meetings should decrease the time between when all application materials are received, and when the Board can review the application for licensure. Second, since February 1996, the two doctorate-level psychology Board members have been re-

viewing psychologists' (Ph.D.) applications, rather than the whole Board. Only those applications with problems are reviewed by the whole Board. We noted in our review that this practice appeared to have decreased the time for licensing Ph.D. psychologists by up to four weeks.

Finally, the testing of social workers was changed from quarterly testing to weekly testing. This should decrease the time that an applicant would have to wait to take the exam and get his or her social worker's license.

The Board's processes could be speeded up even further through better computer capabilities. During this audit, we contacted the Board of Healing Arts and the Board of Nursing to gather some basic comparative information about the ways they process license applications. One of the big differences we noted between those boards and the Behavioral Sciences Regulatory Board was that the other boards were much more highly computerized. For example, officials at the Board of Nursing told us their computer system automatically generates letters to let applicants know such things as when their applications have been received, when all application materials are complete, and when test scores have been received. If the Behavioral Sciences Regulatory Board had access to similar equipment and programs, it might help to greatly reduce the amount of staff time spent on such activities, and the lag time in notifications that go out from the Board.

Conclusion

This audit was generated by concerns that there could be widespread mismanagement of the processing of license applications by the Behavioral Sciences Regulatory Board. We didn't find that to be the case. Our work focused on some of the very worst cases during 1996, and we found that in the vast majority of those cases, the delays generally were caused by something the applicant didn't provide or do. When we asked about the handful of cases in which delays appeared to be attributable to inaction by the Board's staff, generally we were told that it was because of staff shortages. Within the limited time available for this audit, we weren't able to do the detailed analysis necessary to assess the adequacy of the Board's staffing levels. However, one thing that could help the licensing process would be a more automated system, similar to those used by the Board of Healing Arts or the Board of Nursing.

Recommendation

To help improve the efficiency of its licensing process, the Behavioral Sciences Regulatory Board should explore cost-effective options for improving its computer automation capabilities. As part of this process, Board officials should consult with the Board of Healing Arts and the Board of Nursing. Any options considered will need to take into account the limited resources of the Board.

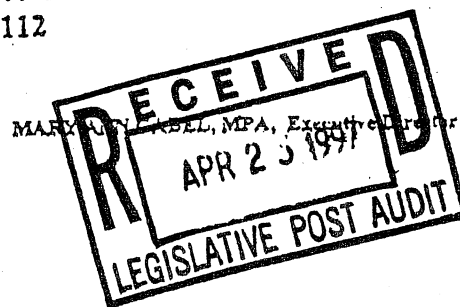
APPENDIX A

Agency Response

On April 18, we provided copies of the draft audit report to the Kansas Behavioral Sciences Regulatory Board. This appendix contains the Board's response to the draft report. After reviewing the response, we made several clarification changes as necessary.

STATE OF KANSAS
BEHAVIORAL SCIENCES REGULATORY BOARD
712 S Kansas Ave - Topeka, KS 66603-3817
913/296-3240 - FAX 913/296-3112

EDWARD F. WIEGERS, J.D., Chairperson



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April 23, 1997

Ms. Barbara J. Hinton
Legislative Post Auditor
Mercantile Bank Tower
800 SW Jackson, Suite 1200
Topeka, KS 66612-2212

Dear Ms. Hinton:

This letter is in response to your letter of April 17, 1997 to the Behavioral Sciences Regulatory Board. In my opinion the draft report appears to be complete and accurate, except for the matters noted herein. I think the members of the board will agree with your conclusion and recommendation.

I would substitute the following for the second full paragraph on page 3 which begins with the words "After all application material".

After all application materials are received, Board staff reviews each application and makes recommendations on credentialing eligibility to the Board or its appropriate professional member(s), or identifies concerns for either to consider. Board staff is authorized to issue social work licenses and alcohol and other drug abuse registrations to eligible applicants. In some cases, (e.g., licensed professional counselors, licensed master's level psychologists and licensed marriage and family therapists) the advisory committees chaired by various Board members are authorized to instruct staff to issue the license to eligible applicants, or make recommendations to the Board concerning the eligibility of an applicant.

Page 2

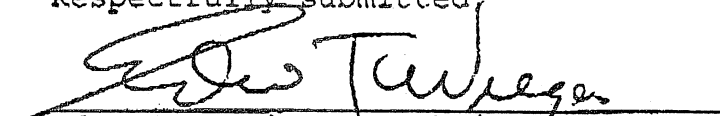
The last line of the last paragraph on page 3 indicates a hearing to appeal the Board's decision. It appears that it would be appropriate to delete the words "to appeal" and substitute the word "on". See K.S.A. 77-537(a).

The report at various places, refers to the six credentialed groups as being "licensed". The alcohol and other drug abuse counselors are registered, not licensed.

The last sentence of the first full paragraph on page 3 would be correct if it read, "For some applicants who are licensed in another state, and if the applicant is seeking credentialing by endorsement or reciprocity, the applicant also must provide that state's licensing laws and regulations."

I am faxing this letter to Mary Ann Gabel to be forwarded to your office. She may supplement this letter with additional comments.

Respectfully submitted,


Edward F. Wieggers, Chairperson

