

June 24, 1994
ILR 94-A

Representative R. Mont Evans
12867 South 2200 West
Riverton, UT 84065

Subject: DOPL Licensing Renewal Process

Dear Representative Evans:

At your request, our office reviewed the licensing renewal procedures of the Division of Occupational and Professional Licensing (DOPL) and we investigated your concerns with DOPL. We were not able to make a judgment about your specific concerns because very little documented information exists and the versions of what happened, as described by the involved parties, are quite different. We found that DOPL processes renewals in a timely manner and that licensees are generally satisfied with the information, assistance, and service they receive from DOPL personnel. However, some licensees are not renewing their licenses and we recommend that DOPL find a way to follow up on these licensees. To ensure licensee satisfaction, DOPL should continue monitoring its own performance. We also recommend that DOPL follow through with its intentions of standardizing the ways the various bureaus verify that licensing renewal requirements have been completed.

DOPL licenses more than 85,000 people in nearly 100 different occupations and professions. This function is supposed to protect the health, safety and welfare of the citizens of the State of Utah. To be licensed, people have to meet various education, finance and work experience requirements depending on the particular occupation or profession. Some occupations and professions have similar requirements to have licenses renewed.

We investigated the concerns you had regarding the Social Worker Board's actions. We interviewed several parties involved and found there are two different versions of the incident. We were not able to obtain any documented accounts of what happened, and consequently, were not able to make a judgment.

We were able to investigate DOPL's activities regarding the timeliness of the renewal process as well as licensee satisfaction with DOPL's function and will address these issues in the remainder of the letter.

DOPL Handles Renewals in a Timely Manner

To evaluate the timeliness of the renewal process, we took a random sample of 40 people who recently went through the process and tracked how long it took DOPL to process renewals and send out new licenses. We chose 10 clinical social workers, 10 certified social workers, and 20 registered nurses. There are two time requirements for DOPL established by the Administrative Code (R156-1-308c):

- (1) The division shall mail a renewal notice to each licensee at least 90 days prior to the expiration date shown on the licensee's license. . . .*
- (4) Renewal notices shall specify a renewal application due date at least 60 days prior to the expiration date shown on the licensee's license in order to permit the renewal applications to be processed prior to the expiration of licensure*

In the sample we collected, we found that DOPL sent out renewal notices an average of 129 days prior to the expiration date shown on the licensees' licenses. DOPL also set the renewal due date 90 days prior to the expiration date shown on the licensees' licenses. Both are well within the time the Administrative Code requires.

We also calculated how long it took DOPL to do some of its tasks to send out renewal notices and licenses in a timely manner. We found the following:

- DOPL mailed renewal notices an average of 3 days after printing them;
- DOPL entered the renewal information an average of 4 days after receiving them;
- DOPL printed new licenses an average of 14 days after entering the renewal data; and
- DOPL mailed the licenses an average of 4 days after printing them.

These times seem to be within reasonable expectations.

DOPL has set even higher goals and seems to be on the path to achieving them. DOPL is trying to send out renewal notices 180 days before the license expiration date to give licensees more than enough time to return renewal forms and fees. To meet this goal, DOPL personnel set up an internal schedule that includes dates by which the various required steps must be completed. DOPL set a goal to enter the renewal information into the computer within four days after receiving the renewal forms; they are currently meeting that goal. DOPL set a goal of printing and mailing licenses weekly (whereas this is only being done every other week now) to send licenses out in a timely manner.

DOPL is also monitoring its own performance. We recommend they collect and evaluate both quantitative and qualitative data in this process.

Licensees Are Generally Satisfied With DOPL Performance

To find out if licensees were satisfied with the information, assistance, and service they received, we called 11 licensees and asked about their recent renewal experience and any contact they have had with DOPL personnel. When we talked with licensees, we found that the majority

felt the following:

- the instructions on the renewal notices were clear;
- they received the notices in plenty of time to send them back to DOPL;
- they received their licenses back promptly; and
- they found DOPL staff knowledgeable and helpful when they contacted DOPL.

Although licensees were generally satisfied with DOPL performance, a few licensees were concerned by a few items. One person was confused by the multiple fees listed on the renewal coupon. One other person thought the new licenses were not as official looking as the old licenses because the licensee address was no longer printed on them.

A group of others seemed to be confused by the two deadlines. DOPL created a system in which there are two deadlines: one deadline date by which DOPL wants the license renewal information and fee back so they can guarantee renewal by the expiration date; the other deadline date is the license expiration date. This seems to confuse people because when we asked nine of them if they had sent their renewals in by the deadline (we meant the first deadline, the one listed on the coupon as "YOUR RENEWAL DEADLINE IS: __/__/__") everyone said "yes." They all said "yes" even though according to DOPL records three of the nine sent their renewal coupons in after the deadline. Perhaps they were thinking of the license expiration date, which they did meet.

DOPL Should Follow Up on Non-renewals and Verify Completion of Renewal Requirements

In our sample of 40 licensees, six had not renewed their licenses. We were only able to contact two of the six but we found one person who was practicing as a clinical social worker without a current license. Whereas DOPL licenses people to protect the public, DOPL should have some policy and process for following up on those people who do not renew their licenses. They could contact people with a letter or phone call telling people their licenses had expired and that they cannot continue practicing until the licenses are renewed. These efforts could be significant depending on how much time, effort and money they want to spend on this matter. Such a policy and process would likely require extra

Representative R. Mont Evans
June 24, 1994
Page 4

personnel and this need could be financed by the late fee that DOPL charges when people renew their licenses after the expiration date.

We also found that DOPL includes such things as continuing education and work experience as renewal requirements. Licensees are required to sign a statement certifying they "have completed or will complete all renewal requirements before the expiration of [their] current license." However, the different bureaus within DOPL use different procedures to verify completed requirements and place a different emphasis on verifying that requirements have been completed. For example, the bureau that handles the CPA licenses has reviewed the renewal requirements in 100% of the cases while the bureau that handles the nurses does a 10% random sample. DOPL personnel said they plan to standardize the ways the bureaus verify these requirements. Again, because these requirements are intended to protect the public, we encourage DOPL to follow through with these intentions.

Recommendations:

1. We recommend that DOPL continue monitoring its own performance.
2. We recommend that DOPL find a way to follow up on licensees who do not renew their licenses.
3. We recommend that DOPL follow through with its intentions of standardizing the ways the various bureaus verify that licensing renewal requirement have been completed.

We hope this letter has provided the information you need on this issue. A letter of response from the Division of Occupational & Professional Licensing is attached. If you have any other questions or need additional information, please contact us.

Sincerely,

Wayne L. Welsh
Auditor General

WLW:MB/lm