

# NATIONAL ASSOCIATION FOR REGULATORY ADMINISTRATION

## ANNOUNCED V. UNANNOUNCED LICENSING INSPECTIONS

### SURVEY REPORT

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JANUARY, 1997

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SURVEY RESULTS  
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EXECUTIVE SUMMARY

SCOPE AND PURPOSE

In September, 1996 the National Association for Regulatory Administration developed and distributed at random a written survey to participants at the 1996 NARA Annual Licensing Seminar in Scottsdale, Arizona. The purpose of this survey was to collect comparative data from a sample of states/provinces/territories and licensing areas about the requirements and practices regarding announced and unannounced licensing inspections.

Data was collected from 40 different states/provinces/territories representing child care, child welfare, drug and alcohol, adult residential, adult day care, mental health, mental retardation and developmental disability licensing. Participants in the survey included licensing professions at all staff levels including field professionals, policy specialists, and managers.

SUMMARY OF RESULTS

• 81% of the survey responses indicated that there were written requirements specifying if licensing inspections should be announced or unannounced.

• License renewal inspections: 39% conduct announced inspections, 35% conduct unannounced inspections, 26% conduct either announced or unannounced inspections depending on the circumstances.

• Complaint inspections: 49% conduct unannounced inspections, 40% conduct either announced or unannounced inspections depending on the circumstances, and 11% conduct announced inspections.

• New facility inspections (initial inspection): 88% conduct announced inspections, 11% conduct either announced or unannounced, and 1% conducts unannounced inspections.

- Interim inspections: 47% conduct unannounced, 45% conduct announced, and 8% conduct either announced and unannounced depending on the circumstances.

- Frequency of unannounced inspections: 39% conduct unannounced inspections on a random basis, 39% conduct unannounced inspections once a year, 13% conduct unannounced inspections twice a year, 7% conduct unannounced inspections more than twice a year, and 2% conduct unannounced inspections every two years. *Note: This data represents how often unannounced inspections are done, not how often any inspection is done.*

- Few states/provinces/territories have any formal targets for conducting unannounced inspections, however of those who do the criteria for targeting licensed facilities for unannounced inspections include: repeat violations, complaint history, negative sanction history, recent staff turnover, violation history, recent serious violations, changes in program, whether facility is accredited, and the type of license. Many survey responses indicated that there should be formal requirements for targeting additional unannounced inspections for problem or potential problem facilities.

Thank you to all those who participated in this survey.

Survey development and analysis by Karen E. Kroh, Pennsylvania, January 8, 1997.

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STATE/ PROV. AND LICENSE AREA	LOCATION OF WRITTEN REQUIRE- MENTS	RENEWAL INSPEC.	COMPLAINT INSPEC.	NEW INSP	INTERIM INSPEC.	FREQUEN. OF UNANN. INSPEC.	FORMAL TARGET FOR UNANN.
British Columbia CC, DD, AR	Policy	N/A Note: licenses are nonexpiring	Unannounced	Both.	Unann.	Every 2 years	None
Manitoba CC	Policy	Announced	Unannounced	Ann.	Unann.	More than twice a year	None
New Brunswick AR	Policy	Announced	Both	Ann.	Ann.	No data	No data
Alaska, City of Anchorage CC,AR, D & A	None	Unann.	Unannounced	Both	Unann.	Twice a year	Prior violations; program change
Arizona AR,D & A	Law Rules	Unann.	Unannounced	Ann.	Both	Once a year (less often if deemed status)	Repeat violation; serious violation
Arizona CW	None	Announced	Both	Ann.	Both	Random	None
Arizona DD	Law	Announced	Both	Ann.	No interim	No data	None
Arizona CC	Law Rules	Unann.	Unannounced	Ann.	Unann.	Once a year	Repeat violations
California CC	Law Rules	Unann. Note: licenses are nonexpiring	Unannounced	Ann.	Both	Once a year- centers Once every 3 years-homes	None

STATE/ PROV. AND LICENSE AREA	LOCATION OF WRITTEN REQUIRE- MENTS	RENEWAL INSPEC.	COMPLAINT INSPEC.	NEW INSP	INTERIM INSPEC.	FREQUEN. OF UNANN. INSPEC.	FORMAL TARGET FOR UNANN.
Colorado CC	Rules Policy	Unann. Note: licenses are nonexpiring	Announced	Ann.	Unann.	Varies depending on criteria	Years licensed; accredit; complaint history;lic- ense status
Connecticut DD	Law	Announced	Announced	Ann.	Ann.	Random, but rarely done	None
Delaware CC,CW	Policy	Both	Unannounced	Ann.	Both	Once a year (family homes-20% per year)	None
District of Columbia CC,CW,AR,DD	Law Rules Policy	Unann.	Unannounced	Unan.	Unann.	Once a year	None
Florida CC	Policy	Both	Unannounced	Ann.	Unann.	More than twice a year	None
Georgia CC	Policy	Unann.	Unannounced	Ann.	Unann.	Once a year	None
Idaho CW, D & A	Rules	Ann.	Both	Ann.	No data	No data	No data
Kansas CC, CW, DD, D & A	Policy	Unann. Except family foster care-ann.	Unannounced	Ann.	Unann.	Once a year	None
Louisiana CC, AR, ADC	Rules Policy	Unann.	Unannounced	Ann.	Unann.	Once a year	None
Massachusetts CC	Rules Policy	Ann.	Both	Ann.	Both	Random	Past legal action
Maryland CC	Law Rules	Both	Unannounced	Ann.	Both	Random	None
Michigan CC	Policy	Ann.	Both	Ann.	Both	Random	No data
Michigan AR	Policy	Ann.	Both	Ann.	Unann.	Random	None

STATE/ PROV. AND LICENSE AREA	LOCATION OF WRITTEN REQUIRE- MENTS	RENEWAL INSPEC.	COMPLAINT INSPEC.	NEW INSP	INTERIM INSPEC.	FREQUEN. OF UNANN. INSPEC.	FORMAL TARGET FOR UNANN.
Minnesota CC, CW, AR, ADC, DD, D & A	None	Semi-ann. Available dates are requested from provider	Both	Ann.	Both	Random	None
Missouri CC	Law Rules Policy	Ann.	Both	Ann.	Both	Random	None
Montana CC	Policy	Ann.	Unannounced	Ann.	No data	No data	No data
Nevada CC, CW	Rules	Unann.	Unannounced	Ann.	Unann.	Twice a year	None
New Jersey CC, CW	Policy	Both	Unannounced	Ann.	Both	Random	None
New Jersey AR	Rules	Ann.	Both	Ann.	Ann.	Random	None
New Jersey DD	None	Both	Both	Ann.	Both	Random	None
New Hampshire CC	None	Both	Both	Ann.	Both	Random	None
New Mexico CC, CW, DD, D & A	Rules	Unann.	Unannounced	Ann.	Unann.	Twice a year	None
North Carolina CW	None	Ann.	Announced	Ann.	Ann.	Random, but rarely done	None
North Carolina AR, ADC	Policy	Ann.	Unannounced	Ann.	Unann.	More than twice a year	None
Ohio-City of Cincinnati CC	None	Both	Announced	Ann.	No data	No data	No data
Ohio AR	Law Rules Policy	Ann.	Both, but notification given in am of unann.	Ann.	Both, but notification given in am of unann.	Once a year	History from prior inspection

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Ohio CC	Rules Policy	Both	Announced	Ann.	Unann.	Once a year	None
Oklahoma CC, CW, D & A	Rules Policy	Unann.	Both	Ann.	Unann.	More than twice a year	None
Oregon DD,AR	Rules	Unann.	Unannounced	Ann.	Unann.	Once every 2 years	None
Oregon CC	Policy	Ann.	Unannounced	Ann.	Both	Once a year	None
Pennsylvania CC, CW, DD, AR, ADC, D & A	Rules Policy	Ann.	Both	Ann.	Both	Random	None, draft law mandates criteria for annual unann.
Rhode Island D & A	Policy	Unann.	Both	Both	Both	Once a year	None
South Carolina CW	Policy	Ann.	Unannounced	Ann.	Both	Random	No data
South Carolina DD, AR, ADC, D & A	Rules	Unann.	Unannounced	Ann.	Unann.	Twice a year	History of complaints, violations, sanctions
South Dakota CC	None	Both	Both	Both	Both	Random	None
Texas CW	Law Rules	N/A Note: licenses are nonexpiring	Both	Both	Both	Once a year	None
Virginia CW	Law Rules Policy	Ann.	Announced	Ann.	Both	Once a year	None
Vermont CC	Policy	Unann.	Unannounced	Ann.	Unann.	Twice a year	Violation history
Washington AR	Rules Policy	Unann.	Unannounced	Ann.	Unann.	Once a year	None

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Washington CW	None	Both	Both	Both	Unann.	Once a year	No data
Washington CC	None	Both	Unannounced	Ann.	Both	Random	No data
Wisconsin CC	Policy	Both	Unannounced	Both	Unann.	Twice a year	History of violations, sanctions, complaints, recent staff turnover
Wyoming CC	Law Rules	Unann.	Both	Ann.	Both	Once a year	Violation and complaint history
Virgin Islands	Law Rules Policy	Both	Both	Both	Unann.	Random	None

LICENSING AREA CODES:

CC = Child Care

CW = Child Welfare

D & A = Drug and Alcohol

AR = Adult Residential

ADC = Adult Day Care

DD = Mental Health, Mental Retardation, Developmental Disabilities

Note: This data was collected through a National Association for Regulatory Administration written survey document distributed at random during the September 1996 NARA Annual Licensing Seminar in Scottsdale, Arizona.

Survey development and analysis by Karen E. Kroh, Pennsylvania, January 8, 1997.