



Mitchell Katz
President and CEO
NYC Health + Hospitals
125 Worth Street 5th Floor
New York, NY 10013
Tel: 212-788-3321
Mitchell.Katz@nychhc.org

October 16, 2018

Kenrick Sifontes
Audit Director
Office of the State Comptroller
Division of State Government Accountability
110 State Street, 11th Floor
Albany, NY 12236

RE: STATUS REPORT - Audit Report on the Oversight of Nurse Hiring and Retention of the New York City Hospitals (2017-N-2)

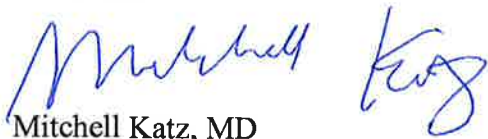
Dear Mr. Sifontes:

Thank you for the opportunity to report the progress New York City Health + Hospitals has made in implementing the recommendations contained in the final audit report originally issued on July 16, 2018.

Enclosed please find the status report, which confirms the implementation date(s) of the agreed recommendations.

If you have any questions regarding our response, please call Mr. Christopher Telano, Chief Internal Auditor/Senior Assistant Vice President at 646-458-5623.

Sincerely,

A handwritten signature in blue ink that reads "Mitchell Katz".

Mitchell Katz, MD

NYC Health + Hospitals' Follow-up Response to the NYS Office of the State Comptroller Regarding Oversight of Nurse Hiring and Retention

Key Recommendations

Recommendation #1: *Ensure all temporary and direct hire nurses are electronically fingerprinted so they can be properly monitored for potential criminal activity.*

NYC H+H Direct Hire Nurses:

The System continues to ensure that all new direct hire nurses, Licensed Professional Nurses (LPNs) and nurse managers are digitally fingerprinted, as described in our response dated April 27, 2018 (hereafter referred to as "System Response").

As reflected in the System Response, we continue to receive arrest notifications for all direct hire nursing staff and nurse managers.

Temporary Agency Nurses:

Following the submission of our initial response, the System has reached an agreement with Vizient, whereby their temporary staffing agencies fingerprint all nursing staff assigned to the System via the FBI. In addition, temporary staffing agencies are conducting a Criminal History Record Search (CHRS) through the NYS Court Administration for all agency nurses. This will provide information regarding a candidate's criminal record at both the national level and the state level. This process replaces the NYPD fingerprints and Code of Conduct.

As stated in the System Response, NYC H+H's User and Dissemination Agreement with DCJS prohibits the System from digitally fingerprinting non-employees, which includes temporary agency nurses. Only the direct employer is permitted to receive information regarding an employee's prior or subsequent criminal activity. Therefore, Vizient has agreed to require agency nurses to self-report arrests which take place after the start of their assignment at a System facility.

Furthermore, System HR will review and approve agency nursing staff with criminal records.

Recommendation #2: *Require facilities to complete and maintain documentation supporting that all background check requirements for nurses are met prior to their hiring.*

As stated in the System Response, Human Resources (HR) conducted annual refresher Onboarding/Background and Form I-9 training for System HR staff, which was completed in August 2018. The System will continue to provide refresher training annually. Furthermore, all new HR staff continue to be required to complete Onboarding/Background and Form I-9 training prior to being given access to background systems. The System's Form I-9 audits are ongoing and expected to be completed within the next eight months.

The System HR Audit Team is conducting system-wide audits of background files of all direct hire nurses at each facility. We will provide feedback and follow-up audits to ensure compliance to the local facilities.

Recommendation #3: *Ensure facilities maintain complete, readily available files for temporary nurses, and document evidence that staffing agencies' background investigations of temporary nurses have been reviewed by NYC Health + Hospitals officials.*

The System and Vizient have implemented the requirement that the Background Checklist and background documents for temporary agency nurses be uploaded into Optimizer, the secure platform for maintaining background and onboarding documents for agency nurses. All documents are uploaded into Optimizer prior to the start of an agency nurse's assignment at a System facility and are readily available for review. In addition, the Background Checklists are reviewed and signed off by local Chief Nursing Officers or designee or HR staff prior to being uploaded into Optimizer.

The System HR Audit Team is conducting audits of this process to ensure compliance with this recommendation.

Recommendation #4: *Require facilities to complete and maintain evidence of annual performance evaluations of direct hire and temporary nurses assigned for more than one year.*

A standardized compliance report will be submitted by Facility Performance Managers (FPMs) monthly and distributed to HR Directors, Chief Nursing Officers (CNOs), and Chief Executive Officers (CEOs). The first report will cover September and is due October 15, 2018.

A quarterly score card for direct hire nurses will be established and reported at CNO meetings. An accountability mechanism will also be put in place in October to assess facility management of temporary nurse performance evaluations. Central Office HR will partner with Central Office Nursing to establish an accountability mechanism for reporting compliance for temporary nurses. Central Office HR staff who are responsible for monitoring annual performance evaluations will also assist with ongoing facility audits.