

Vision Review Program

Audit Report 201819-17

May 13, 2019

Executive Summary

Section 322.12(3), Florida Statutes (F.S.), requires an applicant for a Class E driver's license have an examination to include a test of the applicant's eyesight given by a driver license examiner or by a licensed ophthalmologist, optometrist, or physician. Additionally, Section 322.05(9), F.S., specifies the Department may not issue a license to any person unless such person has successfully passed the required examination.

To acquire a driver's license in the state of Florida, a customer must pass a vision screening (sharpness, acuteness, or keenness of vision) test to determine if they meet mandatory minimum vision standards for licensing. If a customer does not pass the vision screening, they must have a Report of Eye Examination (ROEE) or Mature Driver Vision Test form filled out by an eye specialist and returned to the Department. A vision case is created when the Department reviews a ROEE or Mature Driver Vision Test form and, based on the doctor's evaluation, determines the customer does not have adequate vision to drive without restriction or periodic follow-up.

The purpose of this audit was to review and evaluate the Vision and Re-Exam Section (Vision Section) and to ensure compliance with applicable laws and Department policies and procedures. The Vision Section is responsible for ensuring customers meet minimum vision standards as outlined in Florida Statutes and Florida Administrative Code in order to safely operate a motor vehicle. Our scope included a review of ROEE and Mature Driver Vision Test forms for vision and mature vision cases, as well as the processing of vision cases.

We reviewed a sample of ROEEs, Mature Driver Vision Test forms, and vision case files from August 2018 through November 2018. We also reviewed customers who were mailed a revocation letter between September 2018 through December 2018. Based on our review, we determined two customers had their driving privilege revoked that should not have, and two customers did not have their driving privilege revoked that should have. We also determined all ROEE forms for vision cases were not uploaded into Expert, and the driving record may have been inaccurate for vision customers as follow-up dates were not properly documented within Motorist Maintenance.

In order to improve the Department's oversight of licensed drivers, we recommended the Vision Section properly document and update driver records related to vision cases. Additionally, we recommended the Vision Section ensure case information is accurately uploaded to Expert and updated in Motorist Maintenance to confirm accurate driving privileges.

Management generally agreed and has begun implementing corrective action.

Background and Introduction

To acquire or renew a driver's license in Florida, a customer must pass a vision screening (sharpness, acuteness, or keenness of vision) test to determine if they meet mandatory minimum vision standards for licensing. Customers reading worse than 20/40 in either eye separately or with both eyes together will be referred to an eye specialist for possible improvements. Minimum vision acuity in both eyes must be 20/70 or better with corrective lenses. The customer must have an eye specialist complete a ROEE or, if the customer is 80 years of age or older, a Mature Driver Vision Test form indicating visual standards required for licensing and must submit the completed form to the Department. If a customer fails to submit a vision report as requested, their driver license will be revoked.

The Vision Section is a subsection of the Medical Review Program, which is part of the Bureau of Motorist Compliance under the Division of Motorist Services. The Vision Section is responsible for screening vision reports and enforcing Florida's minimum visual standards for licensing. There are 4 vision specialists and one supervisor that review submitted ROEE and Mature Driver Vision Test forms to determine if the customer meets minimum vision standards in order to be considered for a driver license.

Vision Case Processing

A vision case is created when it is determined the customer has an ongoing eye condition that requires periodic check-ups or reports, or when the customer is 80 years of age and older and is required to have their vision retested at renewal times.

ROEE and Mature Driver Vision Test forms are received daily through mail, fax, and from Tax Collector offices. The Vision Section receives and processes approximately 5,000 ROEE and Mature Driver Vision forms each month. The goal of the section is for each vision specialist to process at least 100 each day.

The Vision Section uses Expert, an electronic case management system to scan and upload documents and track customer interactions. The vision specialist scans the ROEE or Mature Driver Vision Test form to the customer's record in Expert and reviews the form for the exam date (cannot be over a year since seen by a doctor), visual acuity, restrictions to be added or deleted, the visual field chart, follow-up recommendations and if the doctor suggests the customer be required to take a driving test.

A vision case may be referred to the Department's Medical Advisory Board for further review when a customer has a complex or progressive vision condition. There are approximately 40 of these types of cases each month.

If restrictions are needed to be placed on the customer's driving record, the driver's information is forwarded to the Department's Driver Improvement Section. The Driver Improvement Section sends a letter to the customer explaining the restrictions needed and the steps the customer must take to get their license reprinted with the added restrictions. If restrictions are needed to be placed on the customer's driving record for a mature vision case, vision specialists add the restriction, and the case flows through the Department's Processing and Issuance Section (P&I) to issue those customers a license with the added restriction.

If no action is needed, it is considered a closed file and placed in a retention box to go to the archive storage room.

On a weekly basis, the Vision Section supervisor checks for quality by reviewing each vision specialist's activity log that is scanned in their network drive folder. The supervisor randomly selects 10 cases for each vision specialist to check if the document has been scanned into Expert, correct codes/restrictions and dates are updated, and if a letter has been sent (if necessary) in Motorist Maintenance. If errors are found, the information is sent back to the vision specialist for correction.

Mature Vision Cases

All mature vision cases are initially processed through P&I. The mailroom will send P&I all the mature vision renewals and P&I will create a batch sheet with each mature vision customer's name and driver's license number and sends this to the Vision Section to process. The Vision Section compares the form to the customer's record in Motorist Maintenance and verifies whether the customer has been approved, renewed in the office, under medical review, or if the customer's vision form needs to be sent to the vision doctor of the Medical Advisory Board. This information is placed on the batch sheet and returned to P&I office within five days.

First Request and Revocation Letters

A First Request letter notifies the customer that the Department needs an updated vision form from an eye specialist in order for the customer's license to remain valid. This letter is automatically generated through a batch process when codes and dates are placed on the customer's record in Motorist Maintenance by vision specialists. This letter is sent a month prior to the customer's birth month.

A Revocation letter is a written notification to the customer that the minimum visual standards have not been met or the ROEE or Mature Driver Vision Test form was not submitted within the required timeframe. Upon mailing of a revocation letter, the customer has 20 days to respond to the letter, after which the customer's driver's license will automatically be revoked.

Each month, the Vision Section receives batch printed copies of First Request and Revocation letters that are scheduled to be mailed the following month.

Before the Revocation letters are mailed, vision specialists review the customer's record in Motorist Maintenance to verify whether the customer's file has been updated since the letter was printed. If updated documentation has been received, the letters are shredded. If updated documentation has not been received, the letters are mailed to the customer. When sending the First Request letter to the customer, a blank ROEE form is attached to the letter.

If a ROEE form is returned by the doctor/eye specialists within 20 days of the mailing of the Revocation letter, the vision specialist updates the customer's record and mails a letter to the customer indicating the Department received their documentation and the driver license will remain valid.

Processing Backlog

Currently, the Vision Section is working approximately two months behind. As of February 28, 2019, the Vision Section was working to complete the customers whose birth month is December. For those with a December birth month, they will receive their First Request letter in November. Vision customers have two months after their birth month to send in their ROEE form. Therefore, the December birth month customers have until the end of February to submit their ROEEs. If no ROEE is received, a Revocation letter is sent to the customer on the first business day in March.

Because of the deadline to get the December customers processed prior to the Revocation letter being sent, all other birth months are sorted to be worked when that month's deadline is upcoming. Additionally, since the Revocation letters are printed early in the month, Vision Section members have not had the opportunity to remove the sanctions for those that have sent in their ROEE form. Because of this, the Vision Section must sort through all Revocation letters, shred those that are no longer applicable, and avoid sending a valid customer a notice of revocation.

Findings and Recommendations

Vision Case Processing

Finding No. 1: Properly documenting and maintaining current driver records related to vision cases would improve the Department's oversight of drivers.

We reviewed 200 customers who were sent a first request letter to submit a ROEE and 40 mature vision customers between August 2018 through November 2018. We also reviewed 100 customers that were sent a revocation letter from September 2018 through December 2018. Based on our review we noted:

- Two customers should have had their driving privilege revoked due to not submitting the required ROEE forms, but had a valid driver's license listed in Motorist Maintenance at the time of our audit; and
- Two customers had their driving privilege revoked that should not have, as they sent in valid ROEE forms that were uploaded to Expert. After audit inquiry, the Vision Section reinstated the driving privilege for these two customers.

Further review of the customers who were sent a first request letter, noted one or more of the following:

- The ROEE form was not uploaded into Expert for 37 customers, for 23 of these customers OIG staff was unable to determine if the driving record was accurate in Motorist Maintenance because we were unaware of the details listed on the ROEE form, including potential follow-up timeframes;
- There were 11 inaccurate customer driving records in Motorist Maintenance; and
- For the 79 ROEE forms date stamped, it took an average of 51 days from the date ROEE forms were received until it was entered in Expert.

Review of the mature vision customers noted 15 mature vision cases were created. The ROEE forms were not uploaded to Expert for two customers. One of these customers did not meet the vision requirements and did not have a ROEE form completed as required based on their Mature Vision form. Also, restriction information was inaccurate for three customers.

Finally, review of the customers that were sent a revocation letter, noted the following:

- A customer's driving record in Motorist Maintenance was updated using a ROEE form which was completed more than a year earlier; and
- The ROEE forms were not uploaded to Expert for 29 customers who had valid driver's licenses, many of which appeared to be updated by Tax Collector members.

Due to staffing limitations, the ROEE forms were not processed in a timely manner. Currently, the Vision Section is working approximately two months behind. Because of the backlog, they process the ROEE forms for customers who will receive a revocation letter for the following month.

The Vision Section receives the revocation letters early in the current month they are trying to complete; therefore, since the batch print pulls information based on codes in Motorist Maintenance, many vision cases are not updated. At the end of the month, the Vision Section must go through all the revocation letters and dispose of those that were printed from the batch that had since been updated with the ROEE forms.

Additionally, since the Vision Section sorts and works through all the ROEEs by birth month, there is increased likelihood of errors as the driving record in Motorist Maintenance does not quickly get updated with the appropriate vision codes or flags.

Recommendations

We recommend the Vision Section revoke the license of customers who fail to provide a completed ROEE form.

We also recommend the Vision Section enhance the process for ensuring all ROEE forms are updated in Motorist Maintenance at the time of receipt.

We additionally recommend the Vision Section enhance the monitoring process, ensure all ROEE forms are properly uploaded to Expert and all vision case information is accurately reflected in Motorist Maintenance.

Management Response

The Division of Motorist Services agrees with the finding and has started implementing corrective actions. These actions include revoking the licenses of the two customers who failed to provide a completed ROEE form. Additionally, the Vision Section has attempted to find missing documentation and if found, has scanned and uploaded the documentation to the customer driving record.

The Vision Section has also began developing written procedures and policies, updating the DL manual, submitting a technical advisory to the field offices, reviewing the existing quality assurance plan, creating standardized training, and requesting a programmatic change within Motorist Maintenance to automatically cancel a license when proper restrictions are not added. Also, the Vision section has requested additional staff and funding to contract a vendor for scanning all documentation into Expert.

Please see the attachment for the complete management response.

Purpose, Scope, and Methodology

The purpose of this audit was to review and evaluate the Vision Section compliance with applicable state laws and Department policy and procedure.

The scope of this audit included all Vision Section documentation and reports of eye examination as well as the Expert and Motorist Maintenance systems for calendar year 2018.

The methodology included:

- Reviewing applicable Florida Statutes and Administrative Code;
- Reviewing applicable Department policies and procedures;
- Interviewing Vision Section staff members;
- Interviewing Processing and Issuance staff members;
- Reviewing a sample of existing vision cases;
- Reviewing Vision Section case files and correspondence in Expert;
- Reviewing restriction/vision codes and correspondence in Motorist Maintenance;
and
- Reviewing other applicable documentation.

Distribution, Statement of Accordance, and Project Team

Distribution

Terry L. Rhodes, Executive Director
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Rick White, Deputy Director of Motorist Services
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Statement of Accordance

Section 20.055, Florida Statutes, requires the Florida Department of Highway Safety and Motor Vehicles' Inspector General to review, evaluate, and report on policies, plans, procedures, accounting, financial, and other operations of the Department and to recommend improvements. This audit engagement was conducted in accordance with applicable *International Standards for the Professional Practice of Internal Auditing* published by the Institute of Internal Auditors and *Principles and Standards for Offices of Inspector General* published by the Association of Inspectors General.

Project Team

Engagement conducted by:
John Brancale, Auditor
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Under the supervision of:
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Approved by:


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ATTACHMENT - Management Response



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MEMORANDUM

DATE: May 9, 2019

TO: David Ulewicz, Audit Director

FROM: Robert Kynoch, Director, Division of Motorist Services RK

SUBJECT: Management Response to the Vision Review Program Audit (201819-17)

The following is our response to the findings and recommendations presented in the report.

Finding 1 – Vision Case Processing

Properly documenting and maintaining current driver records related to vision cases would improve the Department's oversight of drivers.

Recommendations

We recommend the Vision Section revoke the license of customers who fail to provide a completed ROEE form.

We also recommend the Vision Section enhance the process for ensuring all ROEE forms are updated in Motorist Maintenance at the time of receipt.

We additionally recommend the Vision Section enhance the monitoring process, ensure all ROEE forms are properly uploaded to Expert and all vision case information is accurately reflected in Motorist Maintenance.

Management Response

The Vision Section has completed a comprehensive review of the supporting documentation for the Vision Audit and has taken appropriate action on unresolved issues. This includes revoking the licenses of the two customers who failed to provide a completed ROEE form and reinstating the driving privilege for the two customers whose license should not have been revoked. Management's review of the errors found in the audit found that in one case there was an extension granted to the customer and the extension was not properly followed up on. The other improper revocation and the two

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customers that were not properly revoked resulted from staff coding errors in Motorist Maintenance.

For the 37 customers whose ROEE form was not properly uploaded to Expert, the Vision section has located, scanned, and uploaded 14 ROEE forms and verified the accuracy of the record in Motorist Maintenance. The remaining missing ROEE forms were unable to be located because of staff or field office errors. The eleven inaccurate driving records in Motorist Maintenance have been addressed and proper action taken to update the records. This includes mailing letters for restriction and deletion updates and monitoring for follow-up.

To minimize errors resulting from missed steps in the process, written procedures are being developed for standardized training. Furthermore, internal policies are being reviewed and the Medical Advisory Board (MAB) Vision Specialists will be consulted to review internal policies. Updated policies will ensure all staff have proper guidance for accurately reviewing the ROEE form and coding the record in Motorist Maintenance. The Expert system will be used to accurately track extensions and due dates, using the due date option for follow-ups. Additionally, the Vision Supervisor has requested training on Expert for Vision staff to alleviate errors resulting from lack of training on the system. In an immediate effort to reduce the average number of days it takes from receipt to processing and uploading a ROEE form to Expert, the Vision Section has requested four additional part-time staff members (OPS) for the 2019-2020 Fiscal Year to scan and upload ROEE forms to Expert at time of receipt. The additional staff will ensure the ROEEs are scanned, uploaded, and tracked to a Vision Staff member for timely processing and coding in Motorist Maintenance. This process is modeled after the successful scanning procedures currently used by the Medical Review section. Through reports in Expert, the Supervisor can easily and accurately monitor staff workload and timely processing of ROEE forms.

To address the issues with the backlogged documents, the Vision Section is exploring and seeking funding for the 2019-2020 Fiscal Year to enter into contract with a vendor to have all documents scanned and uploaded to Expert.

The three Mature Vision customers whose records reflected inaccurate restriction information have been addressed and the appropriate restriction letters mailed to the customer. One of the three records required removal of a "B" restriction; however, removal of this restriction is outside the purview of the Vision Section as this restriction is also used for hard of hearing and deaf customers. The one customer without a ROEE form met the vision requirements with corrected vision. One of the two missing ROEE forms was located and added to the customer record in Expert.

To minimize human error and ensure timely cancellations, the Vision Supervisor requested a programmatic change to the Motorist Maintenance program to automatically cancel a license when a customer fails to have the proper restrictions added to the license.

The sample of customers reviewed that were sent a revocation letter noted one customer record was updated using a ROEE completed more than a year earlier. The ROEE form was received in the office prior to one year from the exam date, and in accordance with prior written policy, the form was accepted. As a result, the vision

section will conduct a review and training on internal policies for consistency regarding acceptance of ROEE forms outside the calendar year of the requested vision follow-up.

The Vision Section located and uploaded 21 of the missing ROEE forms for the 29 customers whose license was valid and appeared to have been updated by a Tax Collector office. The other eight forms were unable to be located, potentially as result of staff or field office errors regarding proper retention of the documents.

The Vision Supervisor has submitted updates to the DL Manual to provide clarification to Tax Collector employees on the Vision process regarding submission of the ROEE forms. Furthermore, a Technical Advisory to the Field Offices will be requested to ensure proper submission of the ROEE forms to headquarters.

Finally, to enhance the monitoring process overall, the Vision Supervisor and Program Manager will review the existing Quality Assurance plan to ensure all elements are being addressed, including the elapsed time from receipt of the ROEE form, coding in Motorist Maintenance, and accuracy of forms uploaded to Expert. The Vision Supervisor will review and set an internal policy for timely processing of ROEE forms and add to the established performance goals.