

POLICY: This policy is to ensure that all patients who visit the ICM Cares Clinic will be treated with respect, consideration, and dignity. ICM Cares Clinic will provide and adhere to a procedure for receiving, responding to, and resolving grievances/complaints and concerns of patients or their representatives.

PURPOSE: To establish a process whereby patients or their authorized representatives may have their grievances and complaints resolved in a prompt, reasonable and consistent manner.

PROCEDURE: All patients are to be assured confidential treatment and non-disclosure of records and afforded the opportunity to approve or refuse the release of such information, except as otherwise permitted by law of third-party payment contract and when release is required by law.

Each patient will be made aware of the name and function of any person providing health care services to the patient. ICM Cares Clinic Patient Bill of Rights will be posted in the waiting area in an area visible to all patients.

If at any time during the course of the visit, the patient is dissatisfied with the treatment being provided, to include the unprofessional behavior of the staff, the patient has the right and is encouraged to file a grievance. All complaints will be filed in writing with the Medical Director or the Executive Director and a response will be provided in writing within 21 business days.

No person shall be punished or retaliated against for filing a Grievance or using the Patient Grievance Procedure.

Use of the Patient Grievance Procedure does not limit the right of a patient to seek remedy for a complaint in the legal system.

The Medical Director and/or the Executive Director will take the following actions to investigate:

- Conduct a thorough investigation of all complaints and maintain an office file.
- Maintain anonymity of patients, staff and volunteers when required.
- Seek medical, legal or other professional advice as warranted.
- Complete a final report and forward to the MCB chair for recommendation.
- Inform the patients about the result of the investigation and action to be taken.

- Administer recommended disciplinary action to include removal.
- Staff and volunteers may also file a letter of complaint pertaining to patients and forward written comments and witness statements to the Medical Director and/or the Executive Director.

Grievance process:

Step 1 – Review and Response:

Staff will provide grievance forms to patients whenever requested. Staff will inquire at this time whether there is anything they can do to assist the patient or resolve the matter.

All grievances received by staff members will immediately be forwarded to the Grievance Committee (GC) Chairperson for tracking, distribution and assignment.

The Executive director/Medical Director assigned to address and attempt to resolve the grievance will be allowed up to 7 working days to help resolve the grievance with the client. The 7 working days begin on the date the grievance is received and stamped by the Chairperson.

If a resolution is reached, both the Executive director/Medical Director and the complainant will sign and date the grievance form as satisfied. The Executive director/Medical Director will forward the grievance form to the Chairperson for tracking and reporting purposes.

If a resolution cannot be reached, the Executive director/Medical Director will forward the Patient Grievance Form, the Patient Grievance Action Form, and relevant documentation as necessary, to the GC. The Committee will meet to discuss the grievance within 7 working days.

The complainant and the Executive director/Medical Director will be notified in writing of the Committee's decision. The committee Chairperson will maintain records of the Committee's findings and actions. The GC will send the committee considers written responses to all whose grievance. The response letter will include:

- The decision
- The name of the Clinic contact person
- The steps taken on behalf of the patient to investigate the grievance

- The results of the grievance process; and
- The date of completion.

Step 2 – Appeal Process (Internal)

If the complainant is not satisfied with the Step 1 response of the GC, an appeal may be submitted to the Medical Executive Committee (MEC) within 10 working days of receiving the written decision. A Review Officer will be appointed by the Committee to investigate the grievance. The selection of the Review Officer will be based on expertise relevant to the grievance and the ability to objectively investigate the issue. The Review Officer will submit a written report to the Committee within 10 working days of the assignment. This report will include documentation of the investigative activities and a recommendation for resolution. The Committee will make a decision based on the investigation findings. The complainant Executive director/Medical Director will be notified in writing of the decision within 30 working days of receipt of the appeal.

Step 3 – Appeal Process (Medical Clinic Board (MCB))

If the complainant is not satisfied with the Step 2 response of the GC, an appeal may be submitted to the MEC within 10 working days of receiving the written decision. The Committee will notify the Hospital Administrator of the complainant's desire to appeal the decision of the Committee. A hearing will be scheduled and conducted by the MCB Chair, unless waived by the complainant, within 15 working days of receipt of appeal. The complainant, Executive director/Medical Director and others involved with the issue will be notified at least 5 working days in advance of the date, time and location of the hearing.

Every reasonable effort will be made to ensure full investigation of the issue in a fair and equitable manner. The patient, patient's representative, or Patient Advocate may call witnesses for testimony at the hearing. However, the Executive director/Medical Director may limit repetitive or irrelevant testimony and/or the number of witnesses. If necessary, separate arrangements will be made to hear testimony from parties unable to attend the hearing. The Clinic Administrator will prepare a written decision within 15 working days of the receipt of the Step 3 appeal. The complainant, Executive director/Medical Director will be notified in writing of the decision. In the event the hearing is waived by the complainant, the Executive director/Medical Director will review applicable statements, relevant documentation, and render a written decision within 15 working days of receipt of the Step 3 appeal.

Step 4 – Appeal Process

If the complainant is not satisfied with the Step 3 response of the MCB, an appeal may be submitted to the GC within 10 working days of receiving the Executive director/Medical Director's written decision. The Board of Trustees (BoT) will be notified within 3 working days of receipt of the Step 4 appeal. The BoT render a written decision within 15 working days of his/her receipt of the grievance unless he/she requests additional investigation into the issue. If additional investigation is conducted, the decision will be rendered within 40 working days of completion of additional investigation. The complainant, Executive director/Medical Director and GC will be notified in writing of the decision. Patients or patient's representatives may seek the assistance of advocacy groups at any time during the grievance process.