PARTICIPANT COMPLAINTS AND FEEDBACK	**PROCEDURE NO.: 09.010.010** **SUPERCEDES: 2022 Version** **EFFECTIVE DATE: 04/15/2024**

I. PURPOSE

To describe how Participants may voice complaints and how CITC addresses complaints and feedback consistently, timely, and respectfully.

II. SCOPE

This procedure applies to all Participant services of CITC, subsidiaries and affiliates.

III. PROCEDURE

A. Participant Right. CITC values Participants' Voices and recognizes the right to complain and provide feedback.

1. Notice. Participants will be informed of the right to complain and how to provide feedback at the time that they begin services and periodically thereafter. Notices will be posted and provided as appropriate.

2. Non-Retaliation. CITC prohibits retaliation against any individual who exercises a Participant right, or makes a complaint.

3. Confidentiality. Complaints will be handled as confidentially as possible. Participant information necessary to resolve a complaint will only be shared on a need to know basis, in compliance with applicable privacy law.

4. Prohibition on Waiver of Rights. CITC does not require Participants to waive their rights as a condition of treatment, payment, or eligibility. Retaliation is prohibited.

B. Intake and Initial Response.

1. Service Recovery. Any employee who receives a Participant complaint should try to address the concern or ask a manager or supervisor for assistance. Verbal complaints resolved with customer service effort on the same day do not require further action.

2. Formal Complaint. If a Participant complaint is in writing or is verbal and is not addressable with through customer service efforts, it is a Formal Complaint. Also, a complaint should be treated as a Formal Complaint, if requested by a Participant.

3. Employee Responsibility. An employee who receives a Formal Complaint must:

a. Document the Participant's concern as completely as possible and ask them for preferred contact information. Tell them they will be contacted, as soon as possible, and no later than within two (2) business days.

b. Notify a supervisor and the Participant Engagement Coordinator to ensure that appropriate immediate steps are taken.

c. The Participant Engagement Coordinator will document additional service recovery efforts. Where the appropriate, the Participant Engagement Coordinator will also document the complaint as an incident using an *Incident Report Form*. This includes any complaints that involve conduct that qualifies as an "incident" under the *Incident Response and Reporting Procedure*. Answer "*How was this reported to you?*" by selecting *"Participant report."* Describe the Participant's concern and include their name and contact information.

d. Employees may have additional documentation requirements for certain types of complaints, such as those with a clinical component, in their department or program guidance.

C. Managing Formal Complaints. CITC manages Formal Complaints using its incident reporting system. An employee responsible for a Formal Complaint incident must ensure:

1. The Participant receives a call within two business days, and

2. A written response is sent to the Participant within five business days. In situations where more time is required CITC must tell the Participant the expected timeframe and explain why additional time is needed. The written response must explain CITC's review and resolution, provide CITC contact information, and describe appeal rights or the availability of external reviews.

D. Feedback. If feedback, which is not a complaint, is received by any employee from a Participant, the employee should follow the *Participant Experience Procedure* to ensure the suggestions are heard and documented.

E. Review. CITC will maintain a Participant Satisfaction Committee, as provided in the *Participant Experience Procedure*, which will review all Formal Complaints on a quarterly basis. The committee reviews will be consolidated into annual reports to the President & CEO and the Board of Directors. Reports will state the number of Formal Complaints received, notate trends, areas needing improvement, recommend actions to address the necessary improvements and to ensure implementation of action plans, and provide analysis on whether action taken has accomplished the intended results.

F. Employee Training. Employees will receive training on their role in supporting the Participant right to file a complaint, as appropriate for their position. This will include training at new hire orientation and annually thereafter.

IV. DEFINITIONS

In addition to any terms defined in the policy, these terms are defined for this procedure:

1. **Complaint** means a verbal or written expression of dissatisfaction regarding care or services provided, which can be resolved in a timely manner by staff present.

2. **Formal Complaint** means a written or verbal complaint by a Participant that cannot be resolved through customer service. This includes any complaint that alleges a violation of a patient right, a law, regulation, or standard.

3. **Participant** means a person who is currently receiving services or has received services from CITC. The term also includes personal representatives of the Participant, such as the parent or legal guardian of a minor (someone under the age of 18), the legal guardian or designated representative of an adult. Where the complaint is related to an individual's ability to become a Participant, this term should also be read to include applicants for services.

4. **HIPAA** means the Health Insurance Portability and Accountability Act of 1996 federal law that regulates the national standards in protecting sensitive patient health information from being disclosed without the patient's consent or knowledge.

RELATED AUTHORITY
CARF Employment and Community Services Standard 1.k. Rights of Persons Served