

# Patient Complaint, Grievance, Feedback

## This Policy is Applicable to the following sites:

Big Rapids, Gerber, Ludington, Outpatient/Physician Practices, Pennock, Reed City, SH GR Hospitals, SHMG, United/Kelsey, Zeeland

<b>Applicability Limited to:</b>	N/A
<b>Reference #:</b>	3195
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<b>Functional Area:</b>	Administrative Operations, Patient Rights
<b>Department Area:</b>	Administrative

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## Purpose

To outline the process for informing patients or patient representatives of the process for filing a complaint or grievance about care and services.

To outline the process to be followed for prompt resolution of complaints or grievances.

To outline the process for documentation of positive and negative feedback from patients, families and 3<sup>rd</sup> party sources.

## Responsibilities

All Spectrum Health staff are responsible for coordinating and responding to complaints/grievances. Patient Relations will coordinate with leadership from that area to respond.

## Definitions

**Complaint:** A complaint is a concern expressed by the patient or the patient's representative involving any aspect of care that can be resolved promptly by any staff member present, or who can quickly be at the patient's location (i.e. member of management or Patient Relations) to resolve the patient's complaint.

**Resolved complaint:** The patient and/or patient representative is satisfied with the actions taken on their behalf.

**Grievance:** A patient grievance is a formal or informal written or verbal complaint about any aspect of care that is made to Spectrum Health by a patient or the patient's representative when:

- An issue cannot be resolved promptly by staff present, or who can quickly be at the patient's location (i.e. member of management or Patient Relations) to resolve the patient's complaint.
- An issue is referred for later resolution to management or to the Patient Relations department
- Patients or the patient's representative call or write to Spectrum Health following discharge or after an outpatient service or visit with concerns related to care or an allegation of abuse
- Patients or the patient's representative requests their complaint be handled as a formal complaint or grievance. A patient or the patient's representative has the right to file a grievance or complaint. There will not be any negative repercussions or retaliation of any form to the patient or representative. Spectrum Health strongly desires the opportunity to learn and grow and views these as opportunities to be embraced.
- The patient requests a response from the organization.

Information received from Patient Experience surveys is solicited feedback and does not constitute definition of Grievance or Complaint. Exceptions to this would be an attached letter or document with a request for resolution from the organization.

**Billing Issue:** Billing issues are not considered grievances unless the complaint also contains elements addressing patient services or care issues.

\*Source: CMS (Center for Medicare and Medicaid Services) State Operations Manual, Appendix A, dated April 2004

**Confidentiality:** Complaints received on behalf of a patient, (family, friend, or other person) will be addressed with the patient and permission obtained prior to any further discussion with complainant. All patient contacts are maintained in a strictly confidential database accessed only through the Patient Relations department. Complaint investigations, recommendations and/or actions taken by the organization are for the purpose of quality improvement and peer review pursuant to MCL (Michigan Compiled Laws) 333.20175, 333.21513, 333.21515, 333.531, 331.533.

**Patient Relations:** Per entity, this role may be carried out by Patient Relations, Improvement Specialists, and Patient Experience Specialists.

## **Policy**

### **A. General Statements:**

Spectrum Health recognizes that patients should expect quality care at every encounter and feedback from patients, families, staff, physicians and all others we interact with is an important part of continuous improvement and continuous learning.

The role of the Patient Relations Department in the complaint/grievance process is to:

- Provide access to a centrally coordinated positive patient feedback and complaint/grievance process.
- Receive and review complaints and grievances from the patient, or the patient's representative, and/or referred from staff/physicians.
- Work with the appropriate staff and/or physicians providing care to follow up and resolve issues to the patient's satisfaction.
- Identify educational opportunities for all levels of staff
- Identify process and system improvement opportunities through complaint/grievance tracking and trending.
- Ensure that the complainant feels their concerns are acknowledged and that the concern is resolved to their satisfaction.

Each entity's Board has approved and delegated the responsibility of patient complaints/feedback to the Patient Relations department and to the Grievance Committee. When the grievance is not able to be resolved to the satisfaction of the patient or patient's representative, Patient Relations leadership, or designated entity representative, will review and refer the case as appropriate to the Grievance Committee for their review.

### **B. Complaint Process**

1. Patients and families are notified in writing how to file a complaint or grievance and give positive feedback in the following ways:
  - A description of the complaint process is contained in the materials provided on admission for an inpatient stay.
  - Patient Comment Cards are available throughout the organization for inpatient, outpatient, and provider offices providing a mechanism to share feedback regarding care.
  - The phone number for the entity specific Patient Relations department is available through InSite, in the materials provided on admission, on the Spectrum Health external web site, as well as on the Patient Comment Cards.
  - Feedback may also be sent by email to [patient.relations@spectrumhealth.org](mailto:patient.relations@spectrumhealth.org).

- The patient, family, staff or the physician may contact the Patient Relations department regarding a dissatisfied patient by telephone, e-mail, verbally, through the electronic reporting tool, or in writing.
2. When an issue is raised by a patient or patient's representative, all staff and providers at the point of care, or who can quickly be at the patient's location (i.e. member of management or Patient Relations), should acknowledge and attempt to resolve all patient complaints as soon as possible
  3. Any complaint that cannot be resolved in the moment by staff present or who can quickly be at the patient's location (i.e. member of leadership team or Patient Relations), is postponed for later resolution, is referred to other staff for later resolution, requires investigation, and/or requires further actions for resolution is considered a grievance.
  4. If not resolved, the issue will be forwarded to the Patient Relations department, who will record, triage, evaluate and prioritize the issue as a grievance.
  5. The patient or his/her representative will be contacted by the Patient Relations department acknowledging the grievance and outlining the plan for investigation defined in a timely manner.
  6. Patient Relations will send the grievance to the appropriate team within the organization for follow-up response. Examples:
    - Privacy complaints will be documented and reported to Organizational Privacy, who participates in the investigation and disposition under HIPAA regulations.
    - Complaints/grievances involving the medical staff at the hospital, including quality of care and behavior issues, will be evaluated by Patient Relations department and discussed with the physician involved and/or referred to Medical Staff office, Medical Staff Performance Committee and/or the SHMG leadership as appropriate.
    - Complaints/grievances with Spectrum Health Medical Group providers will be handled by Patient Relations Corporate office, with follow up to provider and Spectrum Health Leadership.
    - Patient Relations will refer grievances involving safety, quality of care issues, or premature discharge to Utilization Review, Quality Management, Medical Staff Quality Improvement, or Safety & Reliability, as indicated.
    - Any complaint/grievance that is not resolved to the satisfaction of the patient by the Patient Relations department will be reviewed for potential referral to the Grievance Committee.
  7. Patient Relations will inform the patient or his/her representative of the right to file a complaint/grievance with the State of Michigan following the instructions in the brochure "Patient Rights & Responsibilities (X17460; Ludington: X18943). This brochure is found in public areas of the organization or through the Patient Relations department.
  8. Patient Relations will notify the patient in writing of the resolution of all grievances. Email and faxes are considered written responses. Documentation will include:
    - Re-statement of complaint.
    - Steps followed to investigate complaint.
    - Results of the grievance process.
    - Date of completion.
    - Name of contact in Patient Relations Department if resolution has not brought satisfaction to patient or their representative.
    - When organization/entity is notified from 3<sup>rd</sup> party source such as a payer or other source, Patient Relations will make contact directly with patient for follow up and address issue per policy.
    - Correspondence will be sent to 3<sup>rd</sup> party thanking them for forwarding concern/complaint/grievance/ compliment
  9. Spectrum Health Ludington follows this policy in addition to other requirements by the State of Michigan and other regulatory bodies.
  10. Inpatient Psychiatric Services (current or past) follows this policy in addition to other requirements established by the State of Michigan Mental Health Code and other regulatory

agencies. Michigan Mental Health Code P.A. 258 of 1974, as amended MDCH; Section 776, Chapter 7A

**C. Positive Feedback Process**

Patient Relations will acknowledge positive feedback received to the patient or patient representative in writing, as appropriate. Information is sent to appropriate department leadership for acknowledgement and celebration with departmental staff. If individual staff members and/or physicians are acknowledged, written recognition is forwarded to the appropriate leadership for distribution to the staff members named by the patient. Physician compliments are routed to the Medical Staff Office and to the individual physician.

**Response Timelines**

Complaints or grievances are managed within a reasonable time frame, depending on the seriousness of the allegations. For example, grievances about situations that endanger the patient, such as neglect or abuse will be reviewed immediately. In general, most grievances should be resolved within 7 days. If the grievance will not be resolved or the investigation will not be completed within 7 days, the patient and/or patient’s representative will be updated with progress to date and an approximate timeframe for a final response.

The following are approximate response time frames:

	<b>Point of Care</b>	<b>After Discharge</b>	<b>Positive Feedback</b>
<b>Acknowledgement</b>	Within 2 hours	Within 1 business day	As appropriate
<b>Departmental Review</b>	Within 2 hours	Within 2 business days	Monthly
<b>Departmental Response</b>	Variable, (issue dependent)	Within 7 business days	As appropriate
<b>Resolution</b>	Variable, (issue dependent)	Within 2 weeks (issue dependent)	NA

**SH Ludington Response Timelines:**

The Patient Relations department will contact the patient or his/her representative in writing within one (1) business day to acknowledge the grievance, and outline the plan for investigation defined in a timely manner. Department leaders may make verbal contact with the patient or his/her representative to acknowledge the grievance and obtain any additional information needed to conduct an investigation.

Every attempt will be made to bring resolution to each grievance within seven (7) business days of the date the grievance has been received. 482.13(a)(2) 10-17-08 A written response must be sent by Patient Relations as soon as possible, but not more than seven (7) business days. Department Leadership will provide Patient Relations with results of investigation and response before business day seven (7) to ensure Patient Relations timeliness of written response to the patient or patient’s representative. If the grievance will not be resolved or the investigation will not be completed within seven (7) business days, the patient and/or patient’s representative will be updated in writing with progress to date and an approximate timeframe for a final response.

## **Grievance Committees**

- A. **Purpose:** To provide oversight of the grievance process at each facility and to act as a final level review for patients with an unresolved grievance. The Grievance Committee reports quarterly to the Executive Quality Committee and/or a quality oversight committee.
- B. **Function:** To provide final level review for patients or their representative with unresolved complaint/grievances by objectively reviewing the case to ensure that no other actions are indicated.
- C. **Membership:** The committee includes the following members or similar roles at each entity. Each entity will determine their membership:
  - Chairperson – Sr. Director, Patient Experience
  - Chief Nursing Officer
  - Quality Director
  - Chief Medical Officer
  - Chief Risk Officer
  - Chief Medical Officer, SHMG (as needed)
  - Chief Compliance Officer, SHMG (as needed)
  - Compliance representative
  - Patient Relations Improvement SpecialistsAd-hoc members will be called in for grievances as needed.

## **SH Ludington Patient Relations (Grievance) Committee:**

The Patient Relations Committee reports quarterly to the Board Safety and Quality Committee. A final determination letter from the Patient Relations Committee will be sent to the patient or patient's representative.

## **Reporting**

- A. All patient complaint and grievances are documented, trended and reported by the Patient Relations Department for purposes of:
  - Identifying improvement opportunities
  - Identifying trends
  - Identifying education opportunities
- B. **Quality Monitoring**  
Indicators of an effective complaint/grievance process will be monitored on a quarterly basis by the Patient Relations Department, including, but not limited to:
  - Service volume
  - Classification of complaints by category
  - Resolution rates
  - Summary of all cases not able to be solved to the patient's satisfaction
- C. **Document Retention**  
All documentation will be retained for seven (7) years from the date of creation

## **Revisions**

Spectrum Health reserves the right to alter, amend, modify or eliminate this policy at any time without prior written notice.

## **Resources/References**

[Social Media Grievance Process/Response](#)

[Patient Rights and Responsibilities](#)

[CMS Operations Manual and Interpretive Guidelines 42CFR 482.13 downloaded 8/10/04 and 8/18/05](#)

HIPAA Regulations 45 CFR §§ 160.300 through 160.306, 160.310, 160.312 and 164.530

Spectrum Health Patient Rights & Responsibilities – X17460

Spectrum Health Patient Rights & Responsibilities – X18943

CMS Operations Manual and Interpretive Guidelines 42CFR 482.13 10-17-08 and 10-09-15

National Integrated Accreditation for Healthcare Organizations (NIAHO) – Interpretive Guidelines and Surveyor Guidance – Version 11, PR.5

Michigan Mental Health Code P.A. 258 of 1974, as amended MDCH; Section 776, Chapter 7A

**To contact the state licensing agency:**

Licensing and Regulatory Affairs  
Bureau of Community and Health Systems  
Health Facilities Division  
P.O. Box 30664  
Lansing, MI 48909  
State of Michigan Complaint Hotline:  
1.800.882.6006

**To contact the office of civil rights:**

Michigan Department of Civil Rights  
350 Ottawa Ave NE  
Grand Rapids, MI 49503  
1.800.482.3604

**To contact the organization that accredits the hospital (excluding Ludington):**

The Joint Commission  
Office of Quality and Patient Safety  
One Renaissance Boulevard  
Oakbrook Terrace, IL 60181  
On the web: [www.jointcommission.org](http://www.jointcommission.org)  
(Use the “Report a Patient Safety Event” link in the “Action Center” on the home page of the website)  
By fax: 630-792-5636

**To contact the organization that accredits the Rural Health Clinic (RHC) Physician Practices:**

(see Appendix A for the appropriate agency)  
The Compliance Team, Inc.  
Via their website: [www.thecomplianceteam.org](http://www.thecomplianceteam.org)  
Or via phone: 1-800-291-5353

## **Policy Development and Approval**

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### **1. Keywords**

Not Set

**Appendix A - Rural Health Clinic (RHC) Survey Process**

			<b>Survey Process State Vs</b>
<b>Reed City Hospital RHC's Tax ID 38-2770076</b>	<b>Address</b>	<b>phone</b>	<b>Deeming Agency</b>
Spectrum Health Reed City Hospital Multi-Specialty Clinic-Reed City	300 N Patterson Rd Reed City MI 49677	231-832-7170	State
Spectrum Health Reed City Hospital Ewart Family Practice	5991 S 95th ave Ewart MI 49631	231-832-8700	State
Spectrum Health Reed City Hospital Tustin Family Practice	111 Church St Tustin MI 49688	231-832-8560	State
<b>Big Rapids Hospital RHC's Tax ID 38-1368744</b>			
Spectrum Health Big Rapids Hospital Family Medicine	650 Linden St Suite 1 Big Rapids MI 49307	231-796-3200	State
Spectrum Health Big Rapids Hospital Family Medicine Canadian Lake	8354 100th ave Suite 1 Stanwood MI 49346	231-796-6000	The Compliance Team
Spectrum Health Big Rapids Hospital Obstetrics and Gynecology	722 Locust St Big Rapids MI 49307	231-592-4200	The Compliance Team
<b>United Hospital RHC's tax ID 38-1358412</b>			
Spectrum Health United Hospital Belding Family Medicine	1227 State St Belding MI 48809	616-794-0940	The Compliance Team
Spectrum Health United Hospital Lakeview Family Medicine	418 Washington St Lakeview MI 48850	989-352-6474	The Compliance Team
Spectrum Health United Hospital Family Medicine and Obstetrics & G	1202 W Oak St Greenville MI 48838	616-754-4686	State
Spectrum Health United Hospital Internal Medicine and Pediatrics - Gr	07 S Greenville West Dr Greenville MI 48838	616-754-3001	The Compliance Team
<b>Gerber Hospital RHC's tax ID 38-1359517</b>			
Spectrum Health Gerber Memorial Family Medicine - Grant	230 S Maple St Grant MI 49327	231-834-5995	State
Spectrum Health Gerber Memorial Family Medicine - Hesperia	78 N Division Hesperia MI 49421	231-854-7235	State
Spectrum Health Gerber Memorial Family Medicine - Fremont	204 W Main St Fremont MI 49412	231-924-1800	State
Spectrum Health Gerber Memorial Obstetrics and Gynecology	212 S Sullivan Fremont MI 49412	231-924-1212	State
Spectrum Health Gerber Memorial Family Medicine Newaygo	211 W Pine Lake Dr Newaygo MI 49337	231-652-1631	The Compliance Team
Spectrum Health Gerber Memorial Multispecialty Clinic Fremont	230 W Oak St Fremont MI 49412	231-942-4200	The Compliance Team
<b>Ludington Hospital RHC's Tax ID 38-1359266</b>			
Spectrum Health Ludington Hospital Family and Internal Medicine-Luc	922 Lawndale St Ludington MI 49431	231-845-7380	The Compliance Team
Spectrum Health Ludington Hospital Family Medicine - Pentwater	500 N Hancock St Pentwater MI 49449	231-869-7051	The Compliance Team
Spectrum Health Ludington Hospital Family Medicine - Hart	2481 N 72nd ave Hart MI 49420	231-873-2163	The Compliance Team
Spectrum Health Ludington Hospital Family Medicine - Ludington	N Atkinson Dr Suite 113 Ludington MI 49431	231-843-3700	The Compliance Team
Spectrum Health Ludington Hospital Internal Medicine - Ludington	N Atkinson Dr Suite 111 Ludington MI 49431	231-843-3600	The Compliance Team
Spectrum Health Ludington Hospital Pediatrics - Ludington	907 E Tinkham Ave Ludington MI 49431	231-843-3477	The Compliance Team
Spectrum Health Ludington Hospital Obstetrics & Gynecology	250 N Nelson Rd, Ludington MI 49431	231-843-6767	The Compliance Team
<b>Pennock Hospital RHC's tax ID 38-1360562</b>			
Spectrum Health Pennock Family Medicine - Lake Odessa	4294 Laurel Dr Lake Odessa MI 48849	616-374-7660	The Compliance Team
Spectrum Health Pennock Family Medicine - Ionia	2776 South State RD , Ionia MI 48846	616-775-7500	The Compliance Team
Spectrum Health Pennock Family Medicine - Gun Lake	851 West M-179 Highway Wayland MI 49334	877-377-7322	The Compliance Team
Spectrum Health Pennock Family, Internal & Pediatric Medicine - Has	1108 W State St #3 Hastings MI 49058	269-945-0922	The Compliance Team
Spectrum Health Pennock Obstetrics & Gynecology - Hastings	105 W Green St Suite 301 Hastings MI 49058	269-945-8080	The Compliance Team
Spectrum Health Pennock Family Medicine - Middleville	490 Edward St Middleville MI 49333	269-795-4434	The Compliance Team
<b>** State of Michigan survey completed</b>			
<b>*** The Compliance Team - deeming agency hired to complete RHC Accreditation</b>			