

POLICY AND PROCEDURE

Title: Complaint Reporting/Customer Service Request Process

Department: Compliance

Effective Date: 11/2015

Annual Review Date: 11/2016, 2/2018

Date Revised: 2/2017

Definitions:

Complaint: Any dissatisfaction expressed by an individual participating in a consumer facing AHI or AHI affiliated program, directly related to the provision of program services.

Customer Service Request: A formal request for program specific assistance, clarification, or guidance made by an individual participating in a consumer facing AHI or AHI affiliated program.

Workforce member means employees, board members, volunteers, interns, independent contractors, vendors, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, volunteers, and staff from third party entities who provide service to the covered entity.

Policy

AHI addresses rapid changes and challenges to the health care industry by working with local providers and community-based organizations through the coordination of planning, recruiting, clinical activities, outreach and oversight of state and grant-supported programs.

Many of the programs which support AHI's mission are consumer facing, and therefore involve direct interaction between AHI workforce members/staff members of provider/community based organizations who have partnered with AHI, and individual community members who are program beneficiaries. These programs include, but are not limited to, AHI's Enrollment Services and Education (EASE) program, AHI's Health Home, and programs implemented throughout the AHI Performing Provider System (PPS) network, as function of the NYS DOH DSRIP program, such as DSRIP Project 2.d.i Patient Activation & Engagement initiatives.

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It is expected that all workforce members of AHI, as well as any employees of AHI's partner organizations with an active role in an AHI associated program, conduct themselves courteously, professionally, and with sensitivity during any and all interactions with community members and program participants. Workforce members with direct interaction with program participants will put forth an effort to communicate with, and provide support to, each program participant (within the scope of their position's responsibilities) in a way which demonstrates respect for the individual's unique needs and characteristics.

If a participant in an AHI program, or a program associated with AHI, is not satisfied with the outcome of interactions with program workforce members/representatives, or with the quality of services provided, they are encouraged to bring any program related questions, concerns, or complaints to the attention of the workforce member with whom they interact directly. When appropriate, the participant may choose to request to speak with the workforce member's supervisor. If the program participant finds the resulting response insufficient, they may then choose to lodge a complaint/submit a formal customer service request by following the procedures outlined below:

Procedure: Reporting a complaint/requesting customer service regarding an employee of AHI, a site or location owned and/or operated by AHI, and/or an internal AHI program.

1. The program participant shall submit their complaint/customer service request in writing to AHI directly. This written communication must be submitted by completing a complaint/customer service request form. The form is available on the AHI website, www.ahihealth.org, and can be submitted through the website, or printed and mailed to the AHI offices at:

**Attn: AHI Compliance Department
101 Ridge St
Glens Falls, NY 12801**

- a. Should the program participant be unable to obtain the complaint/customer service request form from AHI's website, he or she may do one of the following:
 - Seek assistance in printing and completing the form.
 - Call AHI's complaint line at **518-480-0111 x109 or x110**. The information necessary to complete the form will either be taken over the phone or a form will be mailed to the program participant to complete and return, whichever is preferred.

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2. The complaint/customer service request form will be reviewed by the Compliance Department and forwarded to the appropriate AHI workforce member (generally the manager/supervisor of the program in question), who will respond in writing to the individual making the complaint/customer service request, within 15 calendar days from the date of the signed complaint/customer service request form, or postmark, if there is no date on the complaint/customer service request form.
3. The written response will include explanation and/or clarification of AHI policy and procedure as they relate to the individual's complaint or request for customer service. When applicable, the written response will include plans for corrective action. It will also include contact information for the Compliance Department, should the program participant wish to appeal the AHI workforce member's response.
4. The individual who initiated the complaint/request for customer service will have 15 calendar days from the date of the letter of the AHI workforce member's written response in which to make an appeal in writing to the Compliance Department if they aren't satisfied with the written response and/or steps for corrective action planned/taken by the staff member responding to their complaint.
5. The Compliance Department will review the appeal letter and forward to the appropriate supervisor/designated party. The AHI workforce member will have 15 calendar days from the date of the appeal letter, or postmark if there is no date, to respond to the program participant in writing. Their response should again address pertinent AHI policy and procedure, and corrective actions steps when necessary, as well as contact information for the Compliance Department to whom the program participant may submit an appeal if they continue to find the response they've received unsatisfactory or corrective action planned/taken insufficient.
6. The program participant may continue to appeal in writing each subsequent response they receive up to and including a response from AHI's President and CEO. The response given by the President/CEO is final and will represent the last attempt made by AHI to resolve the issue directly with the program participant. The program participant will be responsible for independently pursuing further legal recourse if they remain unsatisfied with the response they've received.

Procedure: Reporting a complaint/requesting customer service regarding a staff member employed by an organization/provider other than AHI, a physical location/site owned and operated by an a business entity other than AHI, or any other program related circumstance which falls under the auspices of an organization/provider which is an entity independent of AHI:

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1. The program participant should seek guidance from their direct contact (or their contact's supervisor when appropriate) within the relevant organization as to how to submit a complaint or request for customer service according to their organization's policies and procedures.
2. If an AHI representative is in receipt of a complaint/request for customer service which does not directly identify an AHI workforce member, a physical location operated by AHI, or a program administered by an AHI workforce member at the client facing level, they will forward the complaint/request for customer service to the appropriate partner organization.
3. AHI's partner organizations should make their internal complaint reporting and customer service policies and procedures available to participants in AHI affiliated programs upon request. Each partner organization will address relevant complaints/customer service requests in accordance with their policies and procedures. Designated leadership within each partner organization will determine if and when a complaint/customer service request regarding an AHI affiliated program should be brought to the attention of AHI leadership. **For Health Home participants, instances of egregious staff misconduct (including but not limited to verbal, physical, or sexual harassment, or any violent or malicious action taken against a program participant), and/or violations of a program participant's civil rights must follow the Health Home Incident Policy and Procedure.** For all other programs, it is suggested that complaints of an egregious nature as described above, or any other complaint/request for customer service for which the partner organization believes it to be in both their and AHI's best interest to respond to mutually, should be brought to the attention of AHI leadership.

Procedure: Tracking and Retention of Complaint/Customer Service Request Forms, Responses, and Appeals:

1. The Compliance Department will be responsible for tracking all complaints and their resolution on the AHI Complaint Tracking Log. Customer service requests which do not qualify as a complaint will not be tracked.
2. Original Complaint/Customer Service Request Forms and subsequent documentation of responses and appeals will be retained at the discretion of the Compliance Department. Otherwise, it will be disposed of in compliance with AHI confidentiality standards.
3. The Compliance Department will forward the Complaint Tracking Log to Program managers/designees, as needed, for any program of which they have oversight. Complaint Tracking Logs over 3 years old can be disposed of in compliance with AHI confidentiality standards.

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4. Documentation of complaints not pertaining directly to an AHI workforce member, site, or program will not be retained by AHI, except at the discretion of AHI leadership.

Procedure: Communication/Distribution of Complaint Reporting/ Customer Service Request Policy and Procedure

1. All AHI workforce members and employees of partner organizations who interact directly with community members should ensure participants in programs under their leadership are aware of the Complaint Reporting /Customer Service Request policy and procedure. An abbreviated version of policy and procedure may be presented verbally or in writing to program participants, and a written copy of the full length policy & procedure must be provided to the participant if expressly requested.
2. AHI workforce members and employees of AHI's partner organizations may be asked to review the aforementioned policy and procedure and to sign a Training Attestation form indicating their acknowledgement and understanding of its content.

Policy Compliance

The Compliance Department will verify compliance to this policy through various methods, including but not limited to, periodic walk-throughs, business tool reports, internal and external audits, and any other necessary means of investigation.

Any workforce member found to have violated this policy may be subject to disciplinary action, up to and including termination of employment or services. In cases where local, state, or federal laws have been violated, workforce members may also face prosecution.

Any workforce member that witnesses a violation of the complaint policy is required to report the incident at the earliest possible moment to either a supervisor or to the Compliance Department. Any incident reported in good-faith is protected under AHI's whistleblower policy.

Contact Person: Corporate Compliance and Privacy/Security Specialist

Responsible Person: Chief Compliance Officer

Approved by: CEO/Board of Directors