



Joint Commission International Accreditation and Certification Policies
©2015 Joint Commission International
Complaint Management/Quality Monitoring

Complaint Management/Quality Monitoring

The JCI Accreditation Office of Quality and Safety Monitoring triages and reviews complaints, concerns, and inquiries related to accredited organizations and certified program, as received from a variety of sources. These complaints may be submitted by patients, families, and health care practitioners, by governmental agencies in the form of reports, or through information from the media. The term *complaint* therefore covers a broad spectrum of information received by JCI Accreditation.

Complaint Management Policy for Accredited Organizations and Certified Programs

Purpose. To outline the scope and process for responding to and managing reported quality of care and patient safety complaints (for example, concern, issue or reported event) complaints against JCI-accredited and –certified organizations.

Complaints submitted to Joint Commission International Accreditation are grouped into the following four categories:

- 1) Accreditation Complaints: Complaints regarding JCI Accreditation, in its role as an accreditor, including complaints related to: (i) the accreditation/certification process, which includes, but is not limited to, policies, procedures, survey process, decisions, standards interpretations, and reports; and (ii) surveyor and JCI Accreditation staff performance and/or behavior.
- 2) Clinical Complaints: Complaints regarding quality of care and safety of patients in a JCI accredited organizations or certified programs, including complaints related to: (i) patient rights, (ii) care of patients, (iii) safety, (iv) infection control, and (v) medication use and security.
- 3) Nonclinical Complaints: Complaints regarding: (i) a JCI-accredited organization or -certified program's compliance with the publicity guidelines, the use of false or misleading accreditation- or certification-related statements, and improper use of the Gold Seal of Approval®; (ii) an unaccredited or uncertified organization making false or misleading statements about its accreditation status; and (iii) improper use by an accredited, unaccredited, certified, or uncertified organization of JCI's (and its affiliates') logos, trademarks, and copyrighted materials.
- 4) Enterprise-Related Complaints: Complaints regarding other persons or entities within The Joint Commission's (US) enterprise (The Joint Commission and its subsidiaries Joint Commission Resources, Joint Commission International, and Center for Transforming Healthcare), including (i) consultants, (ii) sales representatives, (iii) products, (iv) regional office staff, (v) Joint Commission (US) staff, and (vi) alliances.

Patient Safety Culture. In formulating this policy, JCI embraces the concept of *patient safety* culture as defined by the Agency for Healthcare Research and Quality (AHRQ) as the following:

The safety culture of an organization is the product of individual and group values, attitudes, perceptions, competencies, and patterns of behavior that determine the commitment to, and the style and proficiency of, an organization's health and safety management. Organizations with a positive safety culture are characterized by communications founded on mutual trust, by shared perceptions of the importance of safety, and by confidence in the efficacy of preventive measures.

Policy. JCI Accreditation will accept complaints (i.e., issues, concerns or reported events) concerning JCI accredited organizations and certified programs that are submitted via mail, fax, or e-mail. When possible, the



Joint Commission International Accreditation and Certification Policies
©2015 Joint Commission International
Complaint Management/Quality Monitoring

individual submitting the complaint (the “complainant”) should submit the information in English. The complaint information should be summarized in one to two pages and include the following information for the health care organization:

- Organization Name
- Address (Street Name, City, Postal Code and Country)

Given the various restrictions inherent in the social media platforms, JCI will not accept Complaints regarding quality of care and safety of patients that are submitted through JCI social media platforms (including Facebook, Twitter, Flickr, You Tube, and others). These types of social media postings will be removed and the complainant will be re-directed to the official JCI website location—Report a Quality and Safety Issue with a JCI Health Care Organization (<http://www.jointcommissioninternational.org/contact-us/report-a-quality-and-safety-issue>). Upon receipt, a response will be communicated to the Complainant from the Office of Quality & Safety Monitoring via e-mail when the name and email were included with the reported information.

Quality of care and safety of patients concerns submitted to JCI Accreditation may include the name and contact information of the individual submitting the complaint issue/concern or event or the individual may choose to submit the information anonymously. However, complaints that include the contact information of the Complainant will permit JCI Accreditation to request additional information needed for a thorough evaluation and/or to provide applicable follow-up information.

The name and contact information of the individual or individuals submitting the complaint will be kept confidential and not disclosed to any other party without the express permission of the submitter, unless otherwise required by law. However, JCI Accreditation may deem it necessary to share the essential facts of the complaint with the subject organization in the course of JCI Accreditation’s review.

JCI Accreditation will review and evaluate all complaint issues, taking such action as appropriate, based on the information JCI Accreditation receives. However, all individuals communicating with JCI Accreditation should be aware that the organization associated with the complaint may believe that it can determine the identity of the source of the complaint from the nature of JCI Accreditation’s request for information.

JCI Accreditation requires that accredited organizations and certified programs must notify their employees, visitors, and patients that, when complaints reported directly to the accredited organization are not resolved to their satisfaction, they may choose to submit their complaints to JCI Accreditation. Additionally, if the individual submitting the complaint to JCI Accreditation perceives that a lack of patient safety culture exists in the accredited organization or certified program, they may choose to submit their issue, concern, or event (*see* Accreditation Participation Requirements (APR) in each program’s accreditation manual published 1 September 2013 or later).

JCI Accreditation requires that accredited organizations and certified programs must notify their employees, visitors, and patients that no retaliatory actions will be taken against individuals who submit complaints to JCI Accreditation (*see* Accreditation Participation Requirements (APR) in each program’s accreditation or certification manual published 1 September 2013 or later).



Joint Commission International Accreditation and Certification Policies
©2015 Joint Commission International
Complaint Management/Quality Monitoring

Procedure. Complaints may be submitted as follows:

JCI website: <http://www.jointcommissioninternational.org/contactus/report-a-quality-and-safety-issue/>

E-mail: JCIQuality@jcrinc.com

Mail: Quality and Safety Monitoring
Joint Commission International Accreditation
1515 West 22nd Street, Suite 1300W
Oak Brook, Illinois 60523 US

Scope of Complaint Evaluations. JCI Accreditation will use reported complaint issues, concern or event information about JCI-accredited organizations or certified programs to identify opportunities for improving the quality of care and safety of patients in accredited facilities. JCI Accreditation will address all complaints that relate to issues/concerns within the scope of the international standards, accreditation and certification policies, and APRs to determine whether the reported issue/concern raises any credible suggestion of failure to comply with the international standards, accreditation or certification policies, and APRs. These issues include patient rights, care of patients, safety, infection control, medication use, and security. Nonclinical complaints and accreditation/certification complaints filed with JCI Accreditation are processed using other internal policies. Enterprise-related complaints are addressed by, and referred to, the appropriate team.

JCI Accreditation will not address any of the following:

- 1) Individual billing issues and payment disputes, or issues for which JCI Accreditation has no jurisdiction, such as labor relations and the individual clinical management of a patient. JCI Accreditation is not an appropriate authority for the resolution of concerns about the clinical management of an individual patient.
- 2) Issues in an accredited organization or certified program that occurred three or more years prior to submission of the complaint
- 3) Complaints of any kind about unaccredited organizations or uncertified programs

JCI Accreditation's Response to a Complaint. JCI Accreditation encourages individuals to first bring the complaint to the attention of the health care organization's leaders. If this does not lead to resolution, the complaint should be brought to JCI Accreditation's Office of Quality and Safety Monitoring for review.

JCI Accreditation's response to a complaint begins with a review of past complaints about the organization, if any, and the organization's Official Survey Findings Report. Depending on the nature of the complaint, JCI Accreditation will take one or more of the following actions:

- Where serious concerns have been raised about patient safety or standards compliance, JCI Accreditation may conduct an on-site evaluation of the organization.
- JCI Accreditation may ask the health care organization to provide a written and/or verbal response to the complaint.
- JCI Accreditation may incorporate the complaint into the quality monitoring database that is used to continuously track the performance of accredited health care organizations and certified programs over time.
- JCI Accreditation may review the complaint at the time of the health care organization's next scheduled accreditation or certification survey.



Joint Commission International Accreditation and Certification Policies
©2015 Joint Commission International
Complaint Management/Quality Monitoring

Release of Complaint Information. Upon the complainant's request, JCI Accreditation provides the number of complaints an organization has had that met the criteria for review. After JCI Accreditation completes its review, the following information, as appropriate, will be provided to the complainant if requested:

- Any determination that the complaint is not related to JCI standards, accreditation policies, or APRs
- If the complaint is related to standards,
 - the specific standards that were evaluated;
 - any standards for which recommendations for improvement were issued and/or a Strategic Improvement Plan (SIP) as a result of the review; and,
 - when applicable, any change in the organization's accreditation or certification status.

JCI Accreditation policies prohibit JCI from disclosing to a complainant whether a submitted complaint and/or concern is substantiated.