

# Policies and Procedures #A19



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## Subject: COMPLAINT COMPLIANCE

Department: Administrative

Approved/Amended On: 04-26-2017

Approved By: EMSA Board of Trustees

Effective Date: 07/01/2017

This policy/procedure supersedes all other policies/procedures of the same subject.

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### **Purpose**

iSight is designated to centralize information concerning investigations, compliments and all other cases and inquiries to EMSA and the Operations Contractor. iSight allows for the tracking of all inquiries, complaints and investigation tracking progress and sharing of information among multiple involved parties and entities. iSight is the platform that will be used for all incident tracking in the EMSA system.

### **Scope**

This guideline applies to all EMSA staff, the Operations Contractor, and the Office of the Medical Director.

This does not apply to Contractor personnel issues that do not involve EMSA or EMSA property. This system is used for indicated cases identified by EMSA.

### **Guidelines**

1. Cases that are entered in iSight will be in the following categories:
  - a. Billing
  - b. Compliance – Authority
  - c. EMSACare
  - d. General Authority Issue
  - e. HIPAA
  - f. Operations
  - g. Patient Care
  - h. Class 1 Event
  - i. Class 2 Event
  - j. Class 3 Event
  - k. Customer Care
  - l. Compliment
  - m. Driving

- n. Lost Item
  - o. Equipment Failure
  - p. Vehicle Failure
2. iSight users are limited to key EMSA personnel and Operations Contractor leadership team. It is not intended or configured for use (case entry or otherwise) by field members.
  3. Cases will be entered in the system promptly (no later than the conclusion of the shift in which you were notified or made aware of an issue).
  4. When entering a case, conduct a search to ensure the issue has not already been reported and no one is working on the same issue.
    - a. Click on “Search” in the top right hand corner of the site.
    - b. In the “Free Text Search” area at the bottom of the screen, type in words to assist you complete the check (e.g., patient’s name, “lost teeth” or other such key words).
    - c. Use the “Date Search” function to refine your search, if necessary.
    - d. If the search turns up an open or pending case regarding the same issue, add a case note documenting your encounter/involvement in the issue.
    - e. If the search turns up a closed case on the same issue, re-open the case and add a case note relating your new encounter/call. Then assign the case to yourself, accept the assignment and close it.
  5. It is expected that cases will be closed/resolved and information provided to the complainant as soon as possible, but no longer than 10 days; prompts within the system will send escalation alerts when deadlines exceed the 10-day window.
  6. iSight is administered by the Authority. Access levels for individuals will be at the decision of the Authority.

### **Cases – EMSA’s Designation Convention**

When a case is created, it will be designated using the following convention:

- a) Date you are entering the case (expressed in the format of YYYYMMDD).
- b) Complainant Last Name.

## **Case Categories, Definitions and Assignments**

**Category:** **Billing**  
**Definition:** Complaint or query pertaining to a patient's account or billing (amount of charges, mileage, insurance, collections, etc.).  
**Assignment:** **EMSA Patients Accounts Specialist**  
**Investigation:** Authority  
**Auto Notification(s):** TBD by Compliance Officer

**Category:** **Compliance Authority**  
**Definition:** Complaint or query linked to the Authority's Corporate Compliance issues, (Medicare billing, HIPAA, etc.). This is **NOT** related to response time compliance.  
**Assignment:** EMSA Compliance Officer  
**Investigation:** EMSA-Compliance Officer and Compliance Committee.  
**Auto Notification(s):** TBD by Compliance Officer

**Category:** **EMSACare**  
**Definition:** Complaint or inquiry related to the EMSACare program or Utility/Water bill fees for EMSA.  
**Assignment:** **EMSA V.P. of Communications and Public Relations**  
**Investigation:** Authority  
**Auto Notification(s):** TBD

**Category:** **General Authority Issue**  
**Definition:** Complaint or query related to the Authority that does not fit in another category (e.g., complaint about Authority, RSA, etc.).  
**Assignment:** **Chief Operating Officer**  
**Investigation:** Authority  
**Auto Notification(s):** Chief Compliance Officer

**Category:** **HIPAA**  
**Definition:** Complaint of breach of patient confidentiality, HIPAA or other privacy related concern by contractor or Authority personnel, program, or policy.  
**Assignment:** **Chief Compliance Officer**  
**Investigation:** Compliance and assigned in accordance with the incident(s).  
**Auto Notification(s):** TBD

**Category:** **Operations**  
**Definition:** A complaint or inquiry regarding the operations that does not fit into another category.

**Assignment:** **Division Operations Director**  
**Investigation:** TBD  
**Auto Notification(s):** Authority COO and Compliance Officer

**Category:** **Patient Care**  
**Definition:** Any clinically oriented concern(s) formally conveyed by a patient, patient's family, incident involved citizen and/or healthcare provider. These incidents are categorized, investigated and resolved in accordance with the most current MCB approved Clinical Errors Event Reporting policy

**Assignment:** **Division Operations Director/OMD**  
**Investigation:** TBD - OMD in accordance with the established MCB Clinical Errors Event Reporting policy.  
**Auto Notification(s):** COO, Compliance Officer, OMD Division Director

**Category:** **Customer Care**  
**Definition:** Complaint or query that does not pertain to clinically oriented care but involves any situation when a customer is not please with an employee interaction or business transaction and wants someone at a higher level within the organization to resolve the complaint.

**Assignment:** **Authority COO**  
**Investigation:** TBD (routed as appropriate)  
**Auto Notification(s):** COO, Compliance, VP Communications

**Category:** **Compliment**  
**Definition:** Compliment of any nature for the Authority or contractor personnel or program

**Assignment:** **EMSA V.P. of Communications and Public Relations**  
**Investigation:** TBD (routed as appropriate)  
**Auto Notification(s):** COO, Compliance, Contractor Public Information

**Category:** **Driving**  
**Definition:** Complaint or question pertaining to all EMSA, contractor, MMRS etc. vehicle operations in any mode. Includes route of travel, etc.

**Assignment:** **Division Operations Director and/or COO**  
**Investigation:** TBD (routed as appropriate)  
**Auto Notification(s):** COO, TBD

**Category:** **Lost Item**  
**Definition:** All items that are reported as lost and not located (and communicated back to the reporting party) by the end of the investigator's shift will be documented for recording purposes.

**Assignment:** **Division Operations Director**  
**Investigation:** TBD (routed as appropriate)  
**Auto Notification(s):** COO, Compliance

**Category:** **Equipment Failure**  
**Definition:** Any inability to provide a critical and indicated intervention due to device failure that occurs in the setting of patient care. (e.g., defibrillator failure, etc.) or any EMSA equipment that has failed for any reason that meets the above criteria.  
**Assignment:** COO, (TBD and routed based on the situation or equipment type)  
**Investigation:** TBD  
**Auto Notification(s):** COO, Compliance, CIO as needed.

**Category:** **Mechanical Failure**  
**Definition:** Failure of any ambulance or patient transportation vehicle that occurs in the setting of patient care that prevents the vehicle from completing its mission.  
**Assignment:** **Divisions Operations Director**  
**Investigation:** Contractor fleet manager, DOO  
**Auto Notification(s):** COO, Compliance, GM.

## Reporting

- A. The Compliance Committee has the responsibility to gather and review all complaints/grievances. All documents prepared and maintained by the Compliance Committee activities made to EMSA, to the governing body or to the Office of the Medical Control Board, are considered confidential and privileged documents protected by the Record/Quality Assurance Reviews-Continuous Quality Improvement Activity (63 O.S. § 1-2504.2).
- B. Quarterly the Compliance Officer will report to the Board of Trustees legal committee:
  - a. The number of complaints;
  - b. The type of complaints; and
  - c. Any applicable outliers.