



Patient Grievance and Complaint Policy

Complaint Intake, Investigation, and Resolution Process

Effective Date:	December 17, 2025
Medical Director:	Yaw A. Nkrumah, MD

1. Purpose

This policy establishes a fair, transparent process for receiving, investigating, and resolving patient complaints and grievances, ensuring patient rights are protected and quality improvement is continuous.

2. Patient Rights

- File complaints about care quality, access, communication, or privacy
- Receive acknowledgment within 2 business days
- Receive written resolution within 30 days
- File without fear of retaliation
- File external complaints with the United States Department of Health and Human Services Office for Civil Rights (HHS OCR), state medical board, or payers

3. Complaint Categories and Owners

Category	Owner
Clinical Care	Medical Director
Access	Operations Lead
Communication	Patient Experience Lead
Privacy/Health Insurance	Privacy Officer
Portability and Accountability Act (HIPAA)	
Billing	Operations Lead
Discrimination	Medical Director plus Legal

4. How to File a Complaint

- Phone: Call main clinic number
- Email: grievances@sankofafamilymedicine.com (monitored daily)
- Portal: Secure message through patient portal
- Mail: Written complaint to clinic address

- In-person: Request to speak with patient advocate

5. Resolution Timeline

Timeframe	Action
Day 0	Complaint received and logged
2 business days or less	Written acknowledgment sent; assigned to owner
7 days or less	Investigation begins
21 days or less	Investigation complete; determination made
30 days or less	Written resolution sent; corrective actions documented

6. Investigation Process

1. Document complaint verbatim
2. Review relevant records
3. Interview staff and obtain statements
4. Determine if policy was followed
5. Identify root cause
6. Recommend corrective action

7. HIPAA Complaint Handling

- Immediate containment if breach suspected
- Four-factor breach risk assessment: nature of Protected Health Information (PHI), who received it, whether viewed, mitigation
- If breach confirmed: notify patient within 60 days; report to HHS if required
- Document all investigative efforts for OCR defense
- Inform patient of right to file with HHS OCR

8. Resolution and Corrective Action

- Written response includes: summary of complaint, investigation findings, actions taken, patient rights
- Corrective actions may include: staff retraining, process changes, policy updates, disciplinary action
- Systemic issues added to equity dashboard

9. Appeal Process

- Patient may appeal resolution within 30 days
- Appeal reviewed by Medical Director (or external reviewer if Medical Director was original owner)
- Appeal decision within 15 business days
- Patient retains right to external complaint at any time

10. Non-Retaliation

Sankofa Family Medicine (SFM) prohibits retaliation against any patient who files a complaint. Staff who retaliate are subject to disciplinary action up to and including termination.

11. Reporting and Quality Improvement

- Monthly complaint summary to leadership

- Quarterly trend analysis by category and cohort
- Patterns inform equity audit
- Annual summary to Board and Co-Create Equity Council

12. External Complaint Rights

- HHS Office for Civil Rights (privacy): hhs.gov/hipaa/filing-a-complaint
- State Medical Boards: WA Medical Commission (wmc.wa.gov) | SC Board of Medical Examiners (lhr.sc.gov/med)
- Insurance/Payer grievance process
- State Attorney General (discrimination)