



# Patient Grievance and Complaint Policy

## *Complaint Intake, Investigation, and Resolution Process*

<b>Effective Date:</b>	December 17, 2025
<b>Medical Director:</b>	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 Portability and Accountability Act (HIPAA)	Privacy Officer
Billing	Operations Lead
Discrimination	Medical Director plus Legal

### 4. How to File a Complaint

- Phone: Call main clinic number
- Email: [grievances@sankofafamilymedicine.com](mailto: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](https://hhs.gov/hipaa/filing-a-complaint)
- State Medical Boards: WA Medical Commission ([wmc.wa.gov](https://wmc.wa.gov)) | SC Board of Medical Examiners ([llr.sc.gov/med](https://llr.sc.gov/med))
- Insurance/Payer grievance process
- State Attorney General (discrimination)