



A.PROCEDURE FOR HANDLING OF COMPLAINTS AND GRIEVANCES

B.PROCEDURE FOR HANDLING APPEALS

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1.0. Definitions

For the purposes of this document, defined terms in ISO/IEC 17011 shall be used as well as the terms defined hereafter:

- 1.1. Complaint: Expression of dissatisfaction, other than an appeal, by any person or organization, against NABH or NABH Service Delivery Partner or an accredited or applicant organization.
- 1.2. Complainant: any individual / organization / body that is making a complaint.
- 1.3. Grievance: Expression of a real or imagined cause for complaint
- 1.4. Appeal: A formal written request by an accredited or applicant organization for reconsideration of any adverse decision made by NABH related to the organization's accreditation status.
- 1.5. Appellant: an accredited or applicant organization filing an appeal.
- 1.6. Hearing: The process where the Appeal Committee hears oral arguments on an appeal presented by an appellant.
- 1.7. Health Care Organization (HCO) : Any entity providing health care services for which an accreditation program is available with NABH and it may include hospital, SHCO/ nursing home, blood bank, wellness centre, dental healthcare service provider(DHSP), Medical imaging centre, AYUSH hospital, primary health centre or community health centre.

2.0. Objective

The document describes the procedures for dealing with:

- a) Complaints / Grievances from various sources.
- b) Appeals from Health Care Organization (HCO) for reversal of decisions taken by NABH.

3.0 Scope

The procedure described in this document is to be followed in NABH for dealing with different types of complaints / grievances and appeals by HCO. Appeal can be made by HCO against a decision taken by NABH in respect of - refusal to accept an application; refusal to proceed with an assessment; corrective action requests; changes in accreditation scope; denial of accreditation; putting in abeyance, suspension, withdrawal of accreditation or any other action that impedes the attainment of accreditation.

4.0 Responsibility

Responsibility of handling of complaints / grievances and appeals rests on the Complaints and Appeals Officer of the Board. However, the CEO is responsible for monitoring of complaints / grievances and appeals and final decision on closure of the complaint / grievances and appeal.

PART A: PROCEDURE FOR HANDLING OF COMPLAINTS AND GRIEVANCES

5.0 Procedure for Handling of Complaints And Grievances

5.1 Receipt of Complaints

- a) NABH is open to receiving complaints / grievances from any sources. The complaints / grievances can be against applicant/ accredited HCO for the quality of service provided by them. The complaint / grievance can be against personnel involved in accreditation process. The complaint / grievance must be made in writing to CEO with complete details of complainant (name, address, organization etc.). If the complaint / grievance has no details of the complainant or the description is not adequate, the Board will reserve the right of dealing with the complaint / grievance as deemed fit. NABH can investigate the reports appearing in media, if relevant.
- b) Once the complaint / grievance is received at NABH, CEO shall mark the complaint / grievance to the Complaints and Appeals Officer. Immediately on its receipt the same shall be acknowledged with the assurance of thorough investigation in a time bound period.

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- c) The Complaints and Appeals officer shall maintain a record for the complaints / grievance that are received by NABH. He/she assigns the appropriate registration number to the complaint as per the Document Control System in NABH. The important dates viz. date of receipt of complaint / grievance, date of acknowledgement and date of disposal including date of final closure shall be recorded in Complaint File.
 - d) Initial scrutiny of the complaint / grievance is done by the Complaints and Appeals officer. This is to determine that the complaint / grievance falls within the ambit of NABH activities and whether the complaint / grievance prima facie holds ground.
 - e) If it is found that the complaint / grievance does not fall within the ambit of NABH, the complaint / grievance is considered closed and the complainant is informed accordingly.
 - f) If the complaint / grievance falls within the ambit of NABH and the initial information provided in the complaint / grievance is sufficient the complaint / grievance is investigated further as deemed fit.
 - g) The entire handling process of the complaint should respect and maintain confidentiality, avoid conflict of interest and maintain complete impartiality.

5.2 Investigation of Complaints / Grievances

The complaints / Grievances received by NABH can be classified into three categories:

- a) Complaints / Grievances against applicant/ accredited HCO
- b) Complaints / Grievances against Assessors/Experts/ Committee members.
- c) Complaints / Grievances against NABH officials

5.2.1 Procedure for dealing with each category is given below:

- a) On receipt of complaint / grievance, Complaints and Appeals officer shall discuss with the concerned officer dealing with that HCO and the case is investigated accordingly.



- b) If required, a hearing with the complainant or clarification from the concerned may be taken.
- c) The complainant shall be informed about the action taken by NABH.

If the complaint / grievance is found invalid, the complainant as well as the HCO or against whom the complaint is made, is informed accordingly.

- d) The complaint is disposed within a one month of its receipt.

PART B: PROCEDURE FOR HANDLING OF APPEALS

6.0 Terms of Reference of Appeals Committee:

6.1 Structure of the Committee:

6.1.1 Appeal Committee: A panel composed of a minimum of 3 individuals, and a maximum of 5 individuals, independent of the NABH and knowledgeable in matters of accreditation, appointed by the Chair of the Board in consultation with the Chief Executive Officer (CEO) to deal with appeal(s) for a defined tenure as prescribed by the Board. This panel may be augmented by additional subject matter experts as invitee as deemed appropriate, by the CEO, NABH and Chairman Appeals Committee in consultation with CEO, NABH.

- a) The terms of the committee is for two years or as decided by the board.

6.1.2 Function of the Committee

- a) The Appeals Committee will consider appeals against decisions made by the NABH and will deal with them appropriately to recommend decisions to resolve / close the appeals / grievances.

6.1.3 Membership

Appeals Committee members, including the Chair, must wholly satisfy these criteria.

- a) They must not have participated in or influenced the original Accreditation Committee that took the decision now subject to appeal.

- b) They must be free from any conflict of interest concerning the appellant or matter under appeal.
- c) They must be conversant with the Accreditation Process and NABH functioning.
- d) Before progressing to consider any application for appeal , all members of the Committee must satisfy the above criteria and sign a disclaimer to officially record that they detected no conflict(s) of interest with regard to the matters at hand. In the event of not sure of disclaimer such member may reclude himself / herself from consideration of the particular appeal. Should they be unable to do so, the Board must appoint a substitute member(s) with no such conflict(s) of interest.
- e) The panel shall have the necessary competence available to hear the subject of the appeal.
- f) The appeals panel may co-opt expertise if the need arises. A cop-opted person will not have right to vote but will have the prerogative of recording his /her opinion in light off the reason for invite.
- g) Decisions are made on a majority voting basis; the Chairman of the appeals committee has a dual voting power, one as a member of the appeals committee in all cases. In case of a tied result, the Chairman in view of his dual voting power, will casts his vote so that committee may arrive at a final decision.
- h) In absence of the Chairman due to any reason, the Co Chairman chairs the meeting.

6.2.1 Receipt of Appeals

- a) The appeal process is an independent review and evaluation of a decision made by NABH that affects the accreditation status of the Accredited Organization or applicant.
- b) The appeals are generally addressed to the Chairman NABH.
- c) Appeals shall be submitted to NABH in writing within 15 working days of the NABH decision against which the appeals is made.
- d) Appeals request should be sent in the prescribed format (as given in the annexure attached) along with the relevant supporting documents.

- e) Appeals and Complaint Officer / CEO NABH on reviewing the appeal shall look for completeness of the supporting documents and shall ask the appellant for requisite missing document, if any.
- f) When a decision on suspension has been made against which appeal is made by the HCO, the decision shall be put on hold until the Appeal process is completed and a final decision has been rendered.
- g) Complaints and Appeals officer shall acknowledge the receipt of appeals from the HCO. A record pertaining to all appeals including important details like date of receipt, name and address of the HCO, details of appeals and outcome of appeals shall be maintained in the 'Appeals File'.

6.2.2. Deliberation of Appeals Committee and Recommendations

- a) Appeals Committee may meet as and when needed.
- b) After examination of the appeal, the Committee shall seek clarification/documents from all appropriate sources. The Committee, if finds necessary, can depute NABH official/ an assessor or an expert to investigate the matter.
- c) Appeals Committee may recommend a hearing with the appellant, if required.
- d) Any delay or lapse in submission of clarification or relevant documents or hearing process by the appellant, the responsibility/onus of delay will be considered on the appellant himself.
- e) The Appeals Committee may recommend an assessment by a new team. The assessment report is sent to the Accreditation Committee and Appeals Committee for review and their recommendations. However in case if the recommendations of both the committees differ; CEO- NABH in consultation with Chairman- NABH Board takes the final decision.
- f) The detailed report by the Committee shall be submitted to the Chairman for his decision.
- g) The appeal should be disposed off within 8-10 weeks from the date of receipt.

6.2.3 Decision on Appeals

- a) Chairman NABH shall take a decision based on the recommendations submitted by the Appeals Committee.
- b) The decision of the Chairman NABH shall be final and HCO shall be informed accordingly

6.2.4 Costs for the Complaint and Appeal Process

- a) If the resolution of complaint/ appeal is done without undertaking any travel or additional assessment, no financing will be needed for such resolutions.
- b) If the resolution calls for undertaking travel and assessment, the cost will be borne by the HCO.

6.3 Records

Complaints and Appeals officer shall maintain Complaints file and Appeals file.

The file has the following:

- a) Unique registration number given to each complaint/ appeal.
- b) Date of receipt of complaint/ appeal.
- c) Name & address of the complainant/ appellant.
- d) Date of acknowledging of the complaint/ appeal.
- e) Details of action/ investigation.
- f) Date of closure

The complaints file & appeals file is maintained by Complaints and Appeals officer. All correspondence in respect to complaints/ appeals, investigation reports and decisions by CEO or Chairman are filed in order.



Format for making an Appeal

Name of the Appellant	
Contact Details of the representative from Appellant (Name, Designation, Address, E mail id etc.)	
Subject of Appeal (NABH Decision against which appeal is made)	
Summary of Appeal	
Details of Supporting Documents attached	
Signature of Representative from appellant	
Date of appeal	