

## Complaint Incident Report Procedure

Water Tower Nursing and Home Care's (WTN) goal is to successfully resolve all Complaints/Incidents in a fair and timely fashion. All Complaints/Incidents are processed by a WTN supervisor using the Complaint/Incident Report Form.

WTN **does not** handle complaints which are more effectively handled by government, private agencies or the legal system.

WTN first attempts to resolve Complaints/Incidents through education and training. Historically, over 90% of Complaints/Incidents filed are resolved by training and education. However WTN will bypass this step if the individuals involved do not accept education or training.

If the Complaint/Incident cannot be resolved through education and training the complaint will be forwarded to the WTN Agency Manager within two business days. The individuals involved will be notified of WTN's response within 14 days.

Complaints/Incidents are usually closed within 30 calendar days.

Reporting:

WTN reserves the right to use its discretion in reporting any Complaint/Incident to the appropriate government or private agencies or the legal system.

### Abuse, Neglect and Financial Exploitation Prevention and Reporting

- a) When WTN has reasonable suspicion that a client has been the victim of abuse, neglect or financial exploitation, the agency shall do the following:
  - 1) In the case of an individual who is 60 years of age or older, an individual who has been found to be disabled or one who otherwise qualifies as an "eligible adult" under the Elder Abuse and Neglect Act, the agency shall notify the elder abuse provider agency designated by the Department on Aging or an Area Agency on Aging for the area in which the client resides. The agency shall document this report and maintain documentation on the premises for 12 months after the date of the report.
  - 2) In the case of an alleged victim under the age of 18, the agency shall notify the Department of Children and Family Services through the Child Abuse Hotline. The agency shall document this report and maintain documentation on the premises for 12 months after the date of the report.
  - 3) If the abuse or neglect is alleged to be a result of actions by an employee of the agency, or one placed by an agency providing in-home, home health, or home nursing services,

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the agency shall immediately remove the alleged perpetrator from direct contact with clients and investigate the allegation.

- b) In cases of allegations of abuse or neglect by an employee or an individual who has been placed by WTN, WTN shall conduct an investigation and develop a written report of the findings of the investigation within 14 days after the initial report. WTN shall send the written report of the investigation to the Department within 24 hours after completion of the investigation and shall maintain a copy of the report on the agency premises for 12 months after the date of the report.
- c) The written report of the investigation conducted pursuant to this Section shall contain at least the following:
  - 1) Dates, times and description of alleged abuse, neglect or financial exploitation;
  - 2) Description of injury or abuse to client;
  - 3) Any actions taken by WTN;
  - 4) A list of individuals and agencies interviewed or notified by the WTN;
  - 5) A description of the action to be taken by WTN to prevent the abuse, neglect or financial exploitation from occurring in the future; and
  - 6) Statements of any witnesses.
- d) WTN employees shall report abuse, neglect or financial exploitation of a client to WTN management and to the appropriate elder abuse provider agency or the Illinois Department on Aging.
- e) WTN shall immediately contact local law enforcement authorities (e.g., telephoning 911 where available) in the following situations:
  - 1) Physical abuse involving physical injury inflicted on a patient and/or client by a staff member;
  - 2) Sexual abuse of a patient and/or client by a staff member;
  - 3) When a crime has been committed in the patient and/or client's home by a person other than the patient or client;
  - 4) When a patient or client's death has occurred other than by disease processes; or
  - 5) When an allegation of physical abuse, sexual abuse or crime has been reported, or when death (other than by disease or natural causes) has occurred to a patient and/or client.
- f) WTN policy concerning local law enforcement notification:

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- 1) Upon notification WTN Director/Agency Manager will be responsible for:
  - a. Ensuring the safety of patients and/or clients in situations requiring local law enforcement notification;
  - b. Contacting local law enforcement in situations involving physical abuse of a patient and/or client by another person;
  - c. Contacting police, fire, ambulance and rescue services; and
  - d. Seeking advice concerning preservation of a potential crime scene.

### Employee Discipline:

First Violation – Caregiver will be Re-Trained

Second Violation – Caregiver will be Re-Trained and warned the next offense will be documented in their Personnel File

Third Violation – Caregiver will be Re-Trained and WTN will document all three violations in the caregivers Personnel File

Fourth Violation – Caregiver will be Re-Trained and WTN will document in caregiver Personnel File and caregiver will be warned the next offense will be grounds for termination.

Fifth Violation within 6 months of first violation – Termination

### Important Phone Numbers:

Chicago Dept of Family & Support Services – Senior Service/Area Agency on Aging – 312.743.0300

NFCA – Director CCAN Volunteers Jamie Hersh-White – 312.746.6867

Assessment - Department of Human Services – 311

Abuse – IL Dept of Aging – 312.744.4016

Legal – Office of Public Guardian – 312.603.0800

**Elder Abuse** is a serious problem affecting hundred of thousands of elderly persons each year.

The National Center for Elder Abuse (NCEA), along with its many partner organizations, serves as the most comprehensive national resource for professionals and the public. Its mission is to “promote understanding, knowledge sharing, and action on elder abuse, neglect and exploitation”. The NCEA’s website is

<http://www.elderabusecenter.org> and the phone number is (222) 898-2586.

### IDPH Central Complaint Registry

Complaints in regard to WTN being licensed as a Home Services Agency under the Home Health, Home Services and Home Nursing Agency Licensing Act may be submitted either in writing, by telephone, or by electronic means. The Central Complaint Registry operates a toll-free statewide telephone line, twenty-four

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PHONE (312) 280-4980 • FAX (312) 280-7794 • [www.ForGoodHealth.com](http://www.ForGoodHealth.com)

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(24) hours a day. The telephone number is **(800) 252-4343**. Calls are received Monday through Friday, 8:00 a.m. to 5:30 p.m., at the Department's offices at 525 W. Jefferson, Springfield, Illinois 62761. Coverage of the Central Complaint Registry continues after 5:30 p.m. and weekends and holidays by Central Complaint Registry staff, who are contacted at private telephones by an answering service