

Non-Civil Rights Complaints

This module applies to the following security roles:

Receptionist

Clerk

RN/RD

KWIC Administrator



Kansas Department of Health and Environment

Bureau of Family Health

Nutrition and WIC Services

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This module requires use of the computer and the on-line KWIC Training Application.

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Objectives

Upon completion of this activity, WIC staff will be able to:

1. Record non-civil rights complaints against vendors, caregivers/clients, or WIC staff in Client Services.
2. Manage non-civil rights complaints against caregivers/clients or WIC staff.
3. Generate Complaints Pending reports for non-civil rights complaints.

Reading Assignment:

Go to the KDHE Nutrition and WIC web-site at http://www.kdheks.gov/nws-wic/PPM_Table_of_Contents.htm . The Complaints, Civil Rights & Fair Hearings policies are found in the Program Integrity section. Review:

- PRI 01.03.00 Non-Civil Rights Complaints
- PRI 02.00.00 Program Abuse and Sanctions

Introduction

All clients/caregivers, applicants, vendors, and WIC State and Local staff, have the right to file a complaint. The action taken, based on the type of complaint, is critical for the protection of all those involved. The policies in the reading assignment contain specific information about the rights and responsibilities of the above named and the procedures by which a local agency shall document complaints.



It is preferred that all LA staff with Client Services security clearance be trained to take and record complaints. Although all WIC staff should be trained to take and record complaints, Local Agencies should designate a limited number of staff to manage complaints. (Anyone with these KWIC security clearance levels can access the Manage Complaints screens: Clerk, RN, RD, and KWIC Administrator.)

Every month, the LA staff person(s) assigned to oversee complaint management should review the **Complaints Reports** to determine if there are any “open” complaints that need follow up action and closure.

There may be instances when an individual wants to give you information without filing a complaint. The individual may not express that desire directly to you. When someone shares information with you without stating that he or she would like to file a complaint, it is important for you to ask the individual, “Would you like to file a complaint?” Clarifying the intent of the individual will allow you to proceed with the appropriate action. Not all concerns expressed need to be filed as complaints, but the information should be documented in the person’s regular Client Services **Notes** for future reference.

Non-Civil Rights Complaints

Complaints that do not allege discrimination are “non-civil rights complaints” and are recorded in KWIC.

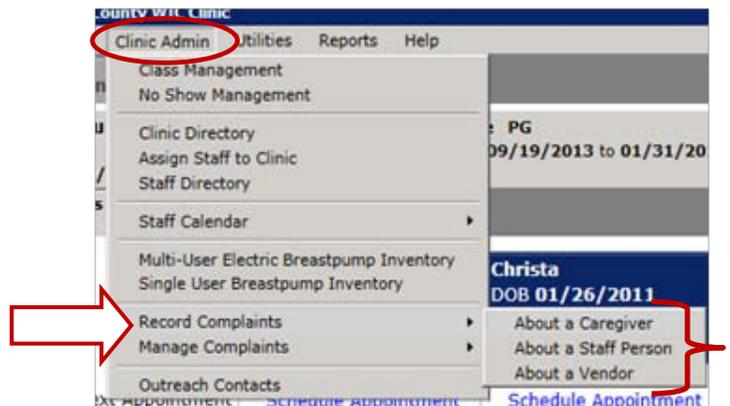
- Complaints against a caregiver/client or WIC staff person are recorded in the Client Services application. They are also managed through Client Services.
- Complaints against vendors may be recorded in Client Services or in the Vendor Management application. All vendor complaints must be managed in the Vendor Management application by the designated vendor contact person. Only the vendor contact person and an alternate at the Local Agency should have access to the Vendor application.

Recording Non-Civil Rights Complaints

Follow the steps and record this complaint in your training environment as you read.

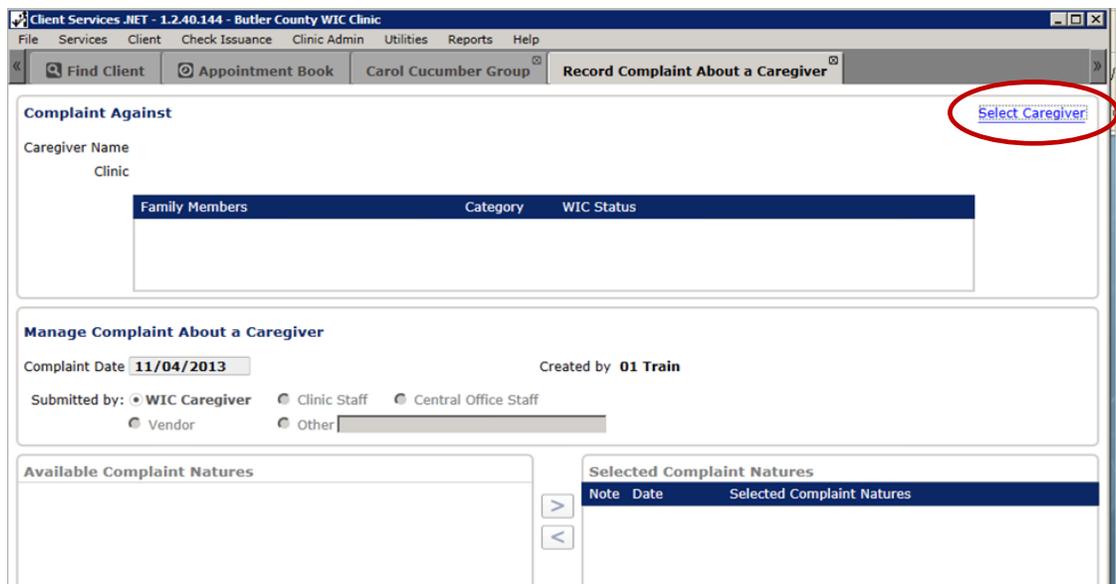
These examples illustrate how to record a complaint about a **Caregiver/Client**. The process is the same if recording a complaint against a staff person or vendor.

1. In the Clinic Admin drop-down menu, hover over Record Complaints to get the additional choices for recording a complaint about a:
 - a. Caregiver/Client
 - b. Staff Person
 - c. Vendor



2. Select About a Caregiver.

3. The Record Complaint window will appear. Click on Select Caregiver.



- A Find Client screen will appear, similar to the normal Find Client screen. Enter the caregiver/client name (full or partial) or Client ID number, if known. In this example, you are entering a complaint against **Carol Cucumber**.
- Retrieve Carol Cucumber's record.
- The selected caregiver/client will appear in the Record Against window. Family members enrolled in WIC will also be listed.

Complaint Against [Select Caregiver](#)

Caregiver Name **Cucumber, Carol**
 Clinic **Butler County WIC Clinic**

Family Members	Category	WIC Status
Cucumber, Carol	PG	Active
Cucumber, Christa	C	Active

Manage Complaint About a Caregiver

Complaint Date 11/04/2013 **Created by 01 Train**

Submitted by: WIC Caregiver Clinic Staff Central Office Staff
 Vendor Other

Available Complaint Natures

- Attempted/Exchange WIC foods for cash
- Attempted/Exchange WIC foods for non-WIC foods
- Attempted/Purchase more food than allowed
- Attempted/Purchase non-food with WIC check
- Attempted/Receive credit for WIC foods
- Attempted/Receive rain-check for WIC foods

Selected Complaint Natures

Note	Date	Selected Complaint Natures
Select a complaint nature.		

- The Complaint date defaults to the current date. This can be changed to a date in the past if entering the complaint in KWIC after the information was taken.
- The screen also displays the person recording the complaint record as Created by.
- Select who submitted the complaint in the Submitted by field. You should list the specific name in notes (or "Anonymous".) If you select Other, you must describe the type of person submitting the complaint in the field next to Other. In this example, it is a **vendor** making a complaint against Carol.
- Select a complaint in **Available Complaint Natures** by clicking on it, and click **[Include]** to move it to the Selected Complaint Natures box. Multiple Complaint Natures can be selected. (Keep reading before you enter the complaint about Carol.
- Always record a note by clicking on the complaint nature that you just moved. Enter the note in the field that appears at the bottom of the screen. *If more than one Complaint Nature is selected, a note with detailed information may be created for*

each “nature” or the detailed information may be entered under only one “nature” to simplify the process. Be sure to make the note detailed. It should always contain:

- a. Date of incident;
 - b. Description of incident, with all pertinent detail;
 - c. Individual(s) and/or organization involved (including any witnesses), with contact information when available; and
 - d. Name of person reporting the incident.
12. To remove a Complaint Nature selected in error, highlight it in the Selected Complaint Natures box and click the **[Exclude]** button
13. Select the complaint natures against Carol as shown below. Make a similar note.
14. Save.

The screenshot shows a software interface for managing complaints. On the left, there is a list titled "Available Complaint Natures" with five items: "Used a pre-signed WIC check", "Used a WIC check outside valid dates", "Used a WIC check with altered dates", "Used a WIC check with no signature", and "Verbal Abuse at clinic". A right-pointing arrow button is next to this list. On the right, there is a table titled "Selected Complaint Natures" with three columns: "Note", "Date", and "Selected Complaint Natures". The table contains two rows: the first row has a menu icon, the date "11/04/2013", and the text "Attempted/Exchange WIC foods for non-WIC foods"; the second row has the date "11/04/2013" and the text "Verbal Abuse at store". Below the table is a text area labeled "Note" containing the text: "Gramond Grape, of Millons store in Happytown called today. On Nov. 2, Carol tried to exchange her cereal for Frosted Flakes. When the clerk would not let her, she loudly cussed out the clerk and left. Garamond's number is 555232-7845." At the bottom right of the interface are "Save" and "Cancel" buttons.



Oops. What if you did not get all the pertinent information in the note for the Selected Complaint Nature? Don't worry. While you cannot edit a complaint in Record Complaints, you can add more information can be added in the Manage Complaints screen.

Special note about complaints against vendors: When you save a complaint against a vendor, the complaint transfers to the Vendor Management application for further action. It can be found in the Vendor Complaint Management Window. Vendor complaints are managed in the Vendor Management application only.



Skill Builder

Record a non-civil rights complaint for a client

A local grocery store manager, Randy Thomas, called to file a complaint against a WIC client. He stated that Prudence Pineapple was rude to a cashier and created quite a scene in his store. After her episode of yelling and rude comments, she refused to sign the WIC checks and hurried out of the store with the WIC food items. Record a complaint against **Prudence Pineapple**.

- Indicate a **Vendor** is submitting the complaint.
- Select the appropriate **Complaint Natures**.
- Record details of the incident in the **Notes** field.
- **Save** the complaint.

Managing Non-Civil Rights Complaints

Refer to policy [PRI 02.00.00 Program Abuse and Sanctions](#) for guidance in assessing program abuse and appropriate sanctions. *Don't hesitate to call the State Agency with questions about handling complaints. It can be a complex process.*



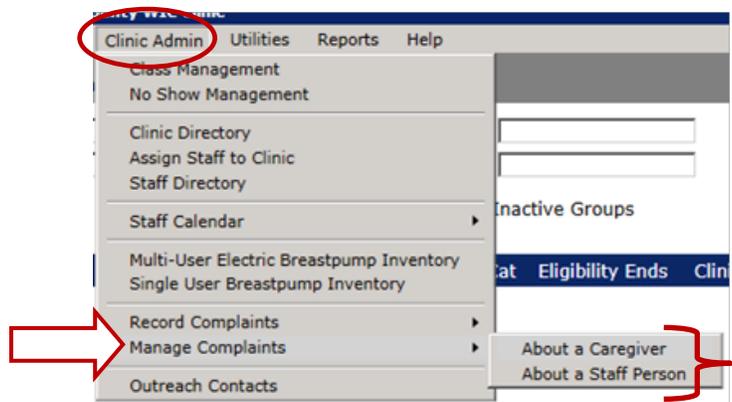
The **Manage Complaints Window** is used to view, edit, and add information about a complaint against a caregiver/client or WIC staff person. This window may also be used to enter a new complaint.



Remember that complaints against Vendors are managed in the Vendor Complaint Management window in the Vendor Management application.

In this example, we'll be managing the complaint you just entered about Carol Cucumber.

1. Locate and click **Manage Complaints – About a Caregiver** in the drop down menu under Clinic Admin. The **Find Complaints About a Caregiver** screen opens.



Complaint Date	Caregiver Name	Status
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2. Click the **[Find]** button to show all existing complaints. In training, there should just be the two complaints that you entered while reading the previous section. In reality, this could be a long list. You could instead choose to enter one or more of the following search parameters then click the **[Find]** button:
 - Complaints From/To find all records between the beginning and ending dates of the range you want to search.
 - Clinic limits the return list to caregivers/clients or WIC staff from the selected option.
 - Caregiver Name Like – Enter the last name or partial name of the Owner to limit the search for all complaints received against a specific owner.
 - Show Only Open Complaints – Check mark this box if you are searching for open complaints only. This box defaults to no check mark which opens all

complaints, closed and open. (Local Coordinators might use this regularly to check that no complaints are left “hanging” open.)

- Complaints remain “open” until WIC staff choose to close the complaint and the **Complaint is Closed** field is checked on the **Action Taken Tab**.
3. In the list box, double-click the record for *Carol Cucumber* (or click once to highlight and then click the **[Retrieve]** button).
 4. The **Manage Complaints About a Caregiver** tab appears. This tab has three screens: **Complaint, Nature, and Action Taken**. It opens to the Complaint screen.



Complaint Screen

The **Complaint** screen is used to view some of the complaint information and record additional information about the complaint as well as record who is managing the complaint.

1. Follow-Up Completed By - Select WIC staff person from the drop down box who is following up on the complaint.
2. On – documents the date of the follow-up contact.
3. Notes - Additional notes may be recorded in the notes field.
4. Click the **[Save]** button at the bottom of the page to save additional complaint information.

Complaint Nature Action Taken

Complaint Against

Caregiver Name **Cucumber, Carol**
Clinic **Butler County WIC Clinic**

Family Members	Category	WIC Status
Cucumber, Carol	PG	Active
Cucumber, Christa	C	Active

Manage Complaint About a Caregiver

Complaint Date **11/04/2013** Created by **01 Train**

Submitted by: WIC Caregiver Clinic Staff Central Office Staff
 Vendor Other []

Follow Up Completed by [] on **00/00/0000**

Note

[]

Save Cancel

Nature Screen

The **Nature** screen is used to see the nature of complaint and associated notes previously entered against a Caregiver/Client or WIC staff person. It functions the same as you already learned in Record Complaints. To read a note previously written while recording the complaint, click on the Note icon next to the selected complaint nature.



If your follow-up has yielded more information, you can:

- Add to or edit the original note about a previously selected Complaint Nature.
- Make more choices from the Available Complaint Nature column and add a corresponding note.
- Deselect a complaint nature chosen in error.

Find Client Appointment Book Find Complaints About a Caregiver Manage Complaints About a Caregiver

Complaint Nature Action Taken

Complaint Nature

Caregiver Name **Cucumber, Carol** Clinic **Butler County WIC Clinic** Complaint Date **11/04/2013**

Available Complaint Natures

- Attempted/Exchange WIC foods for cash
- Attempted/Purchase more food than allowed
- Attempted/Purchase non-food with WIC check
- Attempted/Receive credit for WIC foods
- Attempted/Receive rain-check for WIC foods
- Attempted/Substitute unauthorized foods for WIC
- Attempted/Use a pre-signed WIC check
- Attempted/Use a WIC check at a Non-WIC store
- Attempted/Use a WIC check outside valid dates
- Attempted/Use a WIC check with no signature
- Attempted/Use an altered WIC check
- Attempted/Use another person's WIC check
- Civil Rights Complaint on file
- Exchanged WIC foods for cash
- Exchanged WIC foods for non-WIC
- Exchanging WIC checks for services or housing
- Failure to return a multi-user electric breastpump
- Gave away WIC foods

Selected Complaint Natures

Note	Date	Selected Complaint Natures
	11/04/2013	Attempted/Exchange WIC foods for non-WIC foods
	11/04/2013	Verbal Abuse at store

Note

Garamond Grape of Millon's grocery store in Happytown called today. On Nov. 2, Carol tried to exchange her WIC cereal for Frosted Flakes. When the clerk would not let her, she loudly cussed out the clerk and left. Garamond's number is 555-232-7845.

Save Cancel

Action Taken Screen

The **Action Taken** screen is used to document the follow up method on a complaint received against a caregiver/client or WIC staff person.

Complaint Nature Action Taken

Complaint Action Taken

Caregiver Name **Cucumber, Carol** Complaint Date **11/04/2013**
Clinic **Butler County WIC Clinic**

Action Taken by on
 Complaint is Closed

Available Actions Taken

- Disqualify for 1 month
- Disqualify for 1 year
- Disqualify for 2 months
- Disqualify for 3 months
- Disqualify for 6 months
- Fair Hearing Information to client
- Issue Verbal Warning (document in clinic file)
- Issue Written Warning (copy in clinic)
- Letter of No Response to client
- Notice of Intent to Disqualify to client
- Notice of Intent to Require sub-shopper for client
- Payment Plan Offer to client
- Phone call to client by clinic staff
- Phone call to client by state staff
- Phone call to clinic by state staff
- Refer to authorities for prosecution
- Referred to Alcohol/Drug Treatment Program
- Request clinic review Program Rules with client
- Request for reimbursement letter to client
- Require Substitute Shopper for client
- WICMail to Clinic

Selected Actions Taken

Note	Date	Selected Actions Taken
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1. Use the “Action Taken by...on” field to indicate the appropriate staff member and date.
2. Select as many of the “Available Actions Taken” as appropriate. (To remove a Follow up, highlight it in the Selected Complaint Nature box and click the **[Exclude]** button.)
3. Record a note to further detail the action by clicking a Selected Action Taken. Enter the note in the field that appears at the bottom of the screen. A Note icon  appears by every action with an associated note. If more than one action is selected, a note with detailed information may be created for each “nature” or the detailed information may be entered under only one “nature” to simplify the process.
4. If you are completely done managing the complaint, close it by clicking the checkbox **Complaint is Closed**. This field is not available until you select at least one action.
5. Click **[Save]**.

In the example with Carol Cucumber pretend the following occurring. Document additional information and action taken on the appropriate screens in Manage Complaint.

- When you talked again with the store manager, it becomes clear that she did not really say much just, “I hate this store.” So you can
 - delete the “Abuse Abuse at Store” complaint nature and
 - keep the “Attempt/exchange WIC foods for non-WIC foods”
- You called Carol and she confirms what happened. She apologized for trying to exchange her cereal for Frosted Flakes.
- You checked with the state agency. Because she was not successful in exchanging the food, the state agency suggested a warning letter would fulfill the procedure.
- You sent a warning letter.
- You can close the complaint.



It is important to carefully document all follow up actions taken, including all pertinent details. Documentation of all correspondence, verbal or written, is also necessary. This information will provide a record for future reference if:

- The problem occurs again
- A decision or action is questioned
- The State Agency reviews the complaint



Skill Builder

Manage a Complaint – Assign a Complaint Follow up Nature

Evaluate the complaint entered earlier against **Prudence Pineapple**. Use information found in Policy: [PRI 02.00.00 Program Abuse and Sanctions](#) to determine what sanctions would be appropriate for this situation. Remember that more than one action may be assigned.

- Open the **Manage Complaints** window.
- Retrieve caregiver/client complaint you entered for Prudence Pineapple.
- Pretend your name is Branigan Moon.
- Complete the Manage Complaint process, making up appropriate information.
- For training purposes, do not mark the Complaint as **Closed**.
- Click [**Save**].

Reports Menu

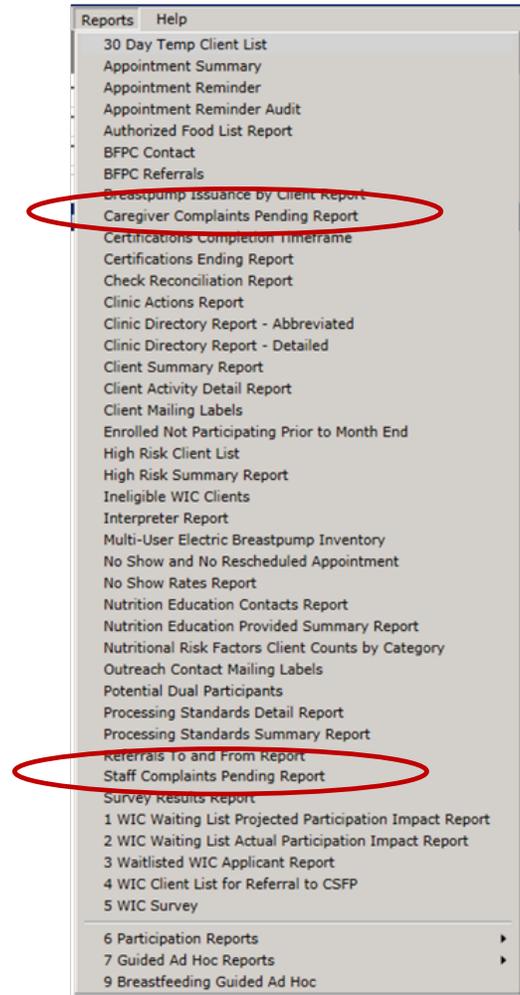
You have already seen how to find pending (open) complaints through the Manage Complaints screen. That method is probably best because you can directly retrieve the pending complaint. But you can also use the Reports menu to very quickly check to see if your clinic has any pending complaints.

Use the **Reports** drop-down menu to access:

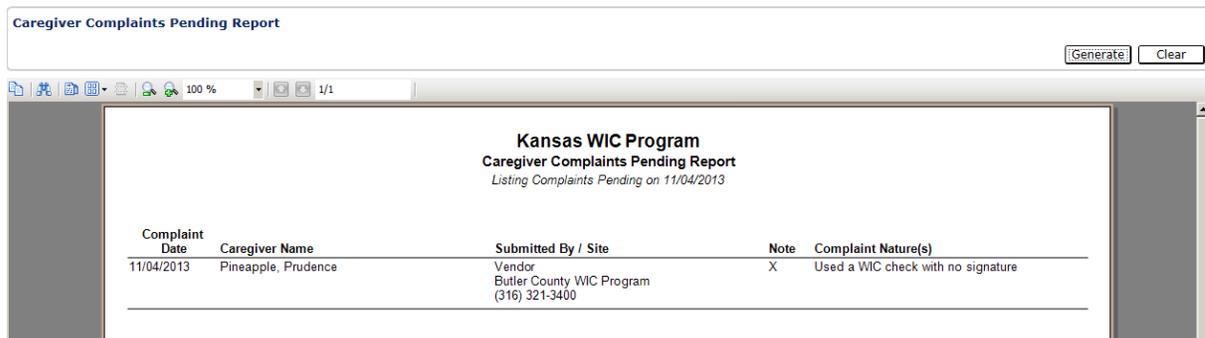
- Caregiver Complaints Pending Report, and
- Staff Complaints Pending Report.

(Remember the pending complaints against vendors will not be here. Those pending complaints are found in the Vendor Management KWIC application.)

From the Reports menu, click on Caregiver Complaints Pending Report. A nearly blank screen displays. Simply click the Generate button.



If there are any pending (open) complaints against Caregivers, they will display.



Likewise, if you select Staff Complaints Pending Report from the Reports menu, are any pending (open) complaints against staff will display.



Every month, the LA staff person assigned to oversee complaint management should review the **Complaints Reports** to determine if there are any “open” complaints that need follow up action and closure.

Check with your supervisor to learn who has this task in your clinic.



Skill Builder

It is a common occurrence that all the follow-up and appropriate actions are taken to manage complaints, but the complaint is not actually closed. That is how the previous Skillbuilder ended – you managed the complaint for Prudence Pineapple but were asked not to mark it as closed for training purposes.

Open the Caregiver Complaints Pending Report and click Generate. If you followed instructions in the previous Skillbuilder, the complaint against Prudence Pineapple should be on the report as still pending. Cancel the report screen.

Use Managet Complaints and retrieve the complaint against Prudence Pineapple. Go to the pertinent screen (Action Taken). Pretend your name is Branigan Moon. Mark the complaint as closed. Save. Close the screen.

Reopen the Caregiver Complaints Pending Report and click Generate. There should be no pending complaints now.

The End