The National Center For Assisted Living created this guide to aid assisted living and residential care facilities in the development of a sound, effective process for handling complaints and grievances. A structured complaint and grievance policy is one of the foundations of a resident-centered approach to care and a hallmark of the nation’s most revered service providers.
The National Center For Assisted Living (NCAL) is committed to quality and performance excellence in the assisted living profession and actively supports Quality First, a covenant for healthy, affordable, and ethical long term care, and adherence to its principles and goals. NCAL represents more than 2,400 non-profit and for-profit assisted living residences through a federation of state affiliates that are dedicated to professional and compassionate care for the elderly and disabled.

NCAL actively represents the assisted living profession’s perspectives to policymakers who shape laws, regulations, policies, and opinions that will influence the future of assisted living. NCAL provides advocacy tools and educational products designed for the assisted living profession to better serve our nation’s elderly and disabled.

For more information about NCAL, please visit our Web site at www.ncal.org or call the national office at (202) 842-4444. For consumer information about assisted living and the continuum of long term care, please visit www.longtermcareliving.com.

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A special thanks goes to the members of NCAL’s 2004 Consumer Relations Committee for their tremendous assistance with and support for the creation of this brochure.
About This Guide

Assisted living facilities certainly receive their fair share of resident and family complaints about many issues, including dining services, cleanliness, policies, activities, missing clothes, and more serious concerns such as theft of resident property or mistreatment of residents. Whatever the scope of complaints received by your facility, it is important to have a clearly defined process by which residents and families can register their concerns. In turn, those concerns should be addressed sincerely and promptly, regardless of the type of the complaint. The resident who shyly says that dinner was cold last night to a personal care aide should be given the same attention as the one who aggressively approaches the facility director about her housekeeping service.

The manner in which complaints are received and addressed demonstrates an important measure of your facility’s commitment to quality care and resident satisfaction. A structured complaint and grievance policy is one of the foundations of a resident-centered approach to care and a hallmark of the nation’s most revered service providers. When clearly communicated to staff, residents, and families and strictly adhered to by all parties, the complaint process can be a valuable asset among your resident relations and retention strategies, as well as a sound risk management practice.

This guide to developing a structured complaint and grievance policy will give you new insight on achieving higher levels of resident satisfaction and may inspire a change of culture throughout the facility. For example, the process could also be implemented for employees, who could make suggestions for improved operations or express dissatisfaction with current policy. Seeing these “complaints” as an opportunity to improve your facility’s quality of care will lead to a more positive working environment for your staff and an enhanced living environment for your residents.

Keeping Residents Satisfied Has Many Benefits

Providing quality care for your residents is the primary reason for working in the assisted living profession. By maximizing resident and family satisfaction with services, activities, or facility operations, you have a better chance at maintaining occupancy rates and building a positive reputation in your community.

Research shows that dissatisfied customers (and their family members) tell on average 15 other people about a negative experience. Without a structured complaint process, residents and their family members may feel their only outlets for venting their concerns are friends, relatives, doctors, home care aides, and others. These negative impressions can seriously affect your facility’s standing in the community and even the ability to attract new residents.

However, data also show that more than 85 percent of dissatisfied clients can be brought back around with efficient and sincere efforts to address their concerns.
In turn, these newly “satisfied” customers can become your strongest supporters. Dissatisfied customers report that when their concerns were handled with attentiveness and empathy and in a timely, personal manner, they were more likely to support how their complaints were resolved.

Another statistic to keep in mind is that as many as 33 percent of people won’t pursue a complaint even though the issue is serious enough for them to remember a year later. This suggests that many dissatisfied residents may simply move out of your facility without ever discussing their concerns or giving you the opportunity to address them. In addition, not only might they take their business elsewhere, they’ll most likely talk about the reason for their departure. Or, a resident or family may silently harbor a complaint and then build a laundry list of little complaints that finally reaches a point where trust in the facility is lost.

The results of various customer surveys suggest that an effective complaint process clearly outlines three matters: how to complain, where to complain, and how seriously it will be handled. From the customer’s viewpoint, a business can demonstrate its commitment to the complaint process by making it visible, accessible, and fair.

Seeing Complaints as Opportunities for Improvement

Ideally, all staff and management would anticipate every resident’s current and future concerns and act on them to prevent a complaint from ever being voiced in the first place. Caregiving staff may observe issues that can be dealt with before they reach the status of a complaint. For example, a caregiver who notices that a resident’s unit is not up to general housekeeping standards should bring the matter to the attention of the appropriate manager before the resident or a family member finds it necessary to raise a concern.

Another way to mitigate future complaints is to carefully manage the expectations of residents and family members. For example, if a resident who moves into a facility has a history of falls, it is unrealistic to believe that those falls will cease because of the change in residence. The falls may be reduced by the facility’s more appropriate surroundings and increased supervision, but the resident’s condition of susceptibility to falls still exists. By helping the resident and family members embrace realistic expectations of care, staff and management can avoid many complaints based on unrealistic expectations.

Despite any facility’s best efforts, however, complaints will occur. How they are received will affect the success of their resolution. Seeing a resident’s or family member’s complaint as an opportunity for improvement is the first step in developing an effective complaint process. An administrator or director must seek to uncover root causes of a complaint and develop solutions that satisfy all parties, including staff. Trying to determine which employee to blame neither encourages staff to record complaints nor enhances the resolution process. This change from “seek to blame” to “seek to improve” can make a substantial difference throughout your facility.
Try this viewpoint: Complaints offer you the chance to enrich your facility’s services and show responsiveness to resident concerns. They allow you to review facility procedures through the eyes of your residents and determine if changes can be made that would benefit residents and staff while staying within safety guidelines. Remember that every complaint does not require a change in policy, but a full review may reveal new ways to deliver services that delight your residents and family members.

Complaints also offer staff an opportunity to contribute to the resolution. The saying that two heads are better than one works well in complaint resolution. Your frontline staff may have several viable solutions based on their knowledge and experience. And what better way to gain buy-in on the resolution than to have it come from the employees who will implement it?

One tough question that consistently arises during the development of such a process is whether the resident/family member is “always right.” Although many people will answer that question differently, it is important that all staff respect the resident/family member’s opinion. When residents or family members share a concern with staff, the employee should always listen attentively, record pertinent information carefully and objectively, and share it with appropriate managers.

Creating a Culture of Continuous Improvement

For assisted living facilities committed to providing top-quality care and services, the complaint process will be an important part of their approach to quality. Effective quality management also includes developing a customer-focused mission statement; surveying and responding to the customers’ needs and expectations; empowering employees to continuously improve and surveying their satisfaction with their work processes and environment; and gathering and analyzing key performance indicators to improve organizational and process results. For more information on developing these quality indicators, please see the “Guidelines for Developing a Quality Management System For Long Term Care Providers,” which is available online at http://ahcaweb.org/quality/qf_index.htm under “Strategies for Implementation.”

Your facility’s procedure for handling complaints and grievances should be regularly communicated to residents, families, employees, and other stakeholders. The information reported by residents, family members, and employees should be recorded, studied, and responded to in a timely and confidential manner. The procedure should include:

➤ A clearly defined process for documenting resident and family concerns that is communicated to and supported by all staff.

➤ A detailed description of the process that tells all residents and family members how to pursue resolution of a concern and a time frame as to when they can expect a response.
A process for assisting residents who need help preparing a written complaint.

The names, job titles, and telephone numbers of the employees responsible for implementing the process to resolve concerns.

The address and toll-free telephone numbers of the ombudsman and the state agency for reporting unresolved issues and concerns.

A follow-up process that verifies that the concern has been resolved to the resident’s and family’s satisfaction.

A means to periodically aggregate and analyze data to identify common issues and areas of concern.

Maintenance of complaint records for quality assurance purposes.

Regular reporting to the facility’s Quality Committee of data on registered complaints, including the total number handled, types, and final dispositions.

A Model Complaint Process

Whatever process you eventually adopt should have as its centerpiece policies and procedures that demonstrate the facility’s commitment to resident satisfaction. What follows is a model procedure that can be customized to fit the needs of your facility.

Step 1: Encourage Residents/Family Members to Share Concerns

Ensure that all facility staff and management encourage residents and family members to share their concerns/complaints. It is far better to have issues addressed early on than to wait for unexpressed complaints to balloon into unwanted calls from an attorney, family physician, or ombudsman.

It is important to recognize that many families and residents do not take their complaints to facility staff for fear of retaliation against the resident. Not only does this situation leave staff helpless in addressing the concerns, it can lead to an unnecessarily tense atmosphere.

You can prevent such an atmosphere by consistently asking residents and family members for feedback, encouraging them often to let you and their caregivers know about any concern they may have. You can extend on-the-spot invitations (in the hallway during a visit) or more formal requests (such as a letter to residents/family members or a newsletter article) for their opinions. These approaches reassure residents and family members of your sincere interest in feedback and help build trusting relationships.

When a resident or family member approaches an employee to discuss a concern, the staff member’s attentiveness and empathy will play an important role during the interaction. Staff should stop what they are doing and give the resident or family member their full attention. They should also maintain eye contact and avoid negative body language, such as crossed arms or shifting weight.
Step 2: Apologize and Take Information at Initial Contact
In general, the employee should apologize for the discomfort or inconvenience caused by the incident. An apology does not mean an acceptance of blame. Rather, it is a way to show the resident or family that the staff member recognizes their concern and distress. Staff will have an opportunity later to explain the situation, in a nondefensive way, if such an explanation is necessary. However, at the initial contact, staff’s response should be that of understanding, recognition, and consolation.

If the employee can competently address and resolve the complaint at the time it is made, he or she should do so, preferably in the resident/family member’s presence. If, after the employee takes action, the resident continues to complain or indicates that the problem is ongoing, the employee should initiate the facility’s complaint procedure.

If unable to resolve the problem, the employee should personally take the resident/family member to a staff member who can address the concern. All staff members should have the names and positions of people to whom they can take both resident and family concerns.

Step 3: Document the Problem
All complaints should be systematically documented (see sample form on page 13). The forms should be readily available to residents and family members. A copy should be included in the resident’s handbook and available throughout the facility, including with the receptionist, at a central location on each floor, or near the dining room or another area where residents often gather. Also, each staff member should have ready access to the form.

The form may be filed in one central location for the entire facility, or in a log book designated for each floor of a facility. It is important to encourage staff to report all complaints. Although direct caregivers may become accustomed to hearing what they categorize as “gripes,” they shouldn’t turn a deaf ear to complaints. They must keep in mind that for every family member or resident they don’t listen to, there might be an attorney waiting for the chance to listen.

Communication books are another way to document complaints. These books are for internal use and serve as a resource between shifts. That is, staff on each shift can report issues that arose with particular residents or family members so the staff on the next shift will understand the history of a situation. Managers can also use the books to look for patterns in complaints and determine if a change in policy or a resident’s service plan is needed.

Step 4: Designate a Staff Contact
In the event that a complaint is not resolved immediately, further review and discussion may be needed. In this case, the facility should designate a single staff person as the family’s contact during the resolution process and should introduce this staff person to the family. If the family understands that this staff person will follow up with them, they may not feel the need to constantly check on the status of the resolution.
For more serious concerns, a letter (see sample on page 12) should also be sent to the family to acknowledge the facility’s receipt of the complaint. The letter should include the staff contact’s name, phone number, and hours available. The letter should also give the resident/family an estimate of how long it will take to resolve the issue.

**Step 5: Gather the Facts**

When a complaint has been logged and the staff member was unable to resolve it during the initial contact, an interview process should be initiated to fully understand the scope of the problem. It is important to hear from all parties involved in the situation. These fact-gathering sessions are not intended to be inquisitions; they are to uncover the root issues that led to the complaint. You should encourage honesty from your staff in relating the events and avoid the stigma of punitive actions during such an interview.

For complaints that deal directly with a policy (such as wake up time, service delivery, or housekeeping), collaborating with staff on the nature of the complaint and gathering their suggestions for addressing the issue helps build unity among staff. Obtaining staff “buy-in” to the solution is important to achieving resident satisfaction.

For more serious issues, such as theft or alleged mistreatment of residents, a more investigatory approach is necessary. In those cases, all staff involved should be interviewed as quickly as possible and appropriate authorities notified.

**Step 6: Formulate a Solution**

At the end of the initial contact, the resident or family member should feel that something was done to resolve the issue. The tangible indication of a resolution can be something as simple as an alternate meal, fresh bed linens, or more detail about an action plan (e.g., a specific date on which the facility will follow up on the problem).

For some policy-related issues that can’t be resolved at initial contact, collaboration with staff on the resolution enhances staff unity and buy-in on the outcome. The resident or family member may also be consulted for input on the solution. For more serious concerns such as theft or alleged mistreatment of residents, contact the proper authorities.

After a resolution has been determined, inform the resident/family as soon as possible. Remember that any communication (verbal or written) must respect the confidentiality of your employees. For example, if a staff member was dismissed over an incident, relaying specific information to a family member may violate the employee’s right to privacy. You can let the resident or family member know that the person no longer is employed at the facility, but it is best to refrain from sharing any details about such personnel decisions. In addition to discussing the resolution, your communication with the family or resident is also an opportunity to reaffirm your commitment to resident satisfaction. If a policy has been changed for the benefit of all residents, include that in the note or phone conversation.
Step 7: Follow Up
It is essential to follow up on any complaints after you believe they have been resolved. The staff contact should call the resident/family member to verify that the resolution was satisfactory.

It is important to also recognize that for some issues a mutually agreed upon resolution cannot be reached. For those unresolved issues, the parties may need to respectfully disagree.

Staff Training Enhances Your Process
Staff training is one of your best strategies for managing resident complaints. Ensuring that your staff fully understand and implement the complaint process is critical to the program’s success. Begin with formal training on your complaint-handling procedures during employee orientation. Have each department keep a copy of the facility’s policies and procedures in a conspicuous place for reference. In employee break rooms, signs that illustrate the facility’s commitment to effective complaint resolutions serve as extra reminders. At times throughout the year, stage role-playing skits that highlight the issue at individual department or all-staff meetings. Repetition of the key elements of your program will help staff stay mindful of the procedures and recognize its importance to the facility.

In addition to educating staff about complaint-handling procedures, ongoing training should cover human reactions and the ways in which different types of people complain. Just as there are many types of human personalities, complainers, too, have different styles. Understanding some common approaches used by dissatisfied clients will help staff resolve an issue by also addressing their deeper motivations.

For example, the quiet resident may not complain at all, so staff should be sure to regularly ask for comments about services and conduct regular satisfaction surveys about the facility. With a more aggressive complainer, staff should listen completely to the complaint, acknowledge the complaint, and log it accordingly. This type of complainer often needs a time frame for resolution but does not respond well to explanations or excuses. A chronic complainer requires extra patience on the part of the staff. While the simple expression of the complaint is helpful for this type of resident, the clear expectation is for a sincere apology and an honest effort to resolve the issue.

Staff should also remember to listen to the problem, not the delivery. Distinguishing the personality from the problem will help staff deal more directly with the facts.

Your training program can also include a discussion of different cultural approaches to personal interactions. As you encounter staff and residents of varied backgrounds and heritages, it becomes important to raise the consciousness of staff about how cultural differences can affect personal behavior.
For example, some cultures shun the idea of making eye contact during caregiving. Take this opportunity to have staff members share their heritage and knowledge of other cultures. Such exchanges could go a long way toward avoiding misunderstandings and improving customer relations.

Guidelines for Good Listening Skills

Another important topic to cover during the complaint-handling training session is the development of effective listening skills. This is a critical skill that must be learned.

Listening is a large part of customer service. To effectively listen, staff must listen for not only the concern, but also for the solution that the resident or family is expecting. The resolution should meet that expectation.

✔ Stop what you are doing and make eye contact when someone addresses you, even if you are in the middle of a task. If your task is time-sensitive, explain this to the resident or family member and tell them when you will be available to listen to the concern. Be sure to be available at the appointed time.

✔ Sit down with the person, if possible. The act of sitting down together feels less rushed and more personal. Try to be on the same eye level.

✔ Limit distractions.

✔ Use positive body language. Keep body language open and friendly. Lean slightly toward the person talking and keep your hands at your side.

✔ Mirror the other person’s concern. For example, say “If I am hearing you correctly...” to reinforce your acknowledgment that you have heard their point.

✔ Say what you can do and do it. For example, if a family member says, “Her bed is always wet,” you must change the perception that the bed is always wet. The words “always” and “again” indicate concerns that have not been expressed or complaints that have not been addressed.

✔ Write the concern down, using the same words as the resident or family member.

✔ Do not try to gain a “win” for the facility. Go for a win-win solution that serves both parties.

✔ Create a climate for collaboration and negotiation. Do not get defensive. Remember that you have a common goal: quality resident care. Become a partner with the resident and family.

“It is essential to follow up on any complaints after you believe they have been resolved. The staff contact should call the resident/family member to verify that the resolution was satisfactory.”
✔ Agree whenever possible. Focus on the issues on which you both agree.

✔ Say “yes” whenever possible. “Yes” is a powerful tool in moving toward common ground. “Yes, I agree.” “Yes, he looks forward to breakfast.”

✔ Project confidence and competence. Sit up straight, make eye contact, use the person’s name often, and do not shy away from stressful encounters.

Using Conflict Resolution Techniques For Difficult Situations

There will be times when residents or family members become agitated because of a perceived problem. That agitation may lead to further frustration and, potentially, a loud, public display.

Often, the force of the anger or frustration directed at a staff member has nothing to do with the individual personally. In fact, the staff member may have no control over the problem. However, the staff member must listen, wait, and respond in a manner that will diffuse the situation rather than escalate it.

The most important step a staff member can take is to listen actively, which means conveying nonverbal messages through eye contact and occasional nods so that the frustrated or angry resident or family member feels that the staff member is listening and interested. Next, staff should treat any complaints or concerns as valid: For the moment, they are valid simply because they are the perceptions of the resident or family member. Later investigation may show that other factors came into play and the situation was not as the resident or family member perceived. But, at that initial moment, the concern should be validated.

Statements such as “I see how this would concern you” help diffuse the situation by letting the resident or family member know that the concern has been heard and the point made. As with any complaint, staff should refer the matter to the appropriate manager, who will initiate an inquiry. It is important to objectively document all steps taken.

Guidelines for Diffusing Difficult Behaviors

✔ If a family member’s complaint indicates that a resident may be in imminent danger, go immediately to the resident to assess the situation.

✔ If an outburst occurs in a public area, break in at an opportune moment and suggest moving the discussion to a private area. An effective statement may be “I do want to fully understand your concern. Let’s move to [a more private area] as I’d like to hear more.”

✔ Avoid standing over a resident or family member who is angry or frustrated. Both parties should be at the same eye level, whether seated or standing.
✔ When the anger or frustration begins to subside, validate the concern and express gratitude to the resident or family member for bringing the complaint to staff’s attention.

✔ Begin to ask questions to gain a greater understanding of the complaint or concern when the resident or family member is calmer. As you ask questions to clarify and define the issue, it may be helpful to take notes. Taking notes not only shows interest, but also helps to list the “facts” perceived by the resident or family.

✔ When you feel that you understand the concern, restate it to the resident or family for confirmation.

✔ When concluding the conversation, tell the resident or family member what will be done. Follow up with the resident or family in the time frame given.

✔ Besides telling the family member or resident that an investigation will occur, take the time to provide additional customer service. “Will that be satisfactory?” “Is there anything that we can do in the interim to make this situation better?”

The Role of Resident and Family Councils

A resident council is an organized group of residents who live within an assisted living community. The residents meet regularly to provide feedback to facility management, address concerns, develop suggestions, and plan activities for the facility at large. This forum can also be used to inform the residents of new policies and procedures.

Each facility is encouraged to have a resident council to address concerns or desires related to facility operation and services. The meetings provide a forum for addressing concerns raised by individual residents and developing solutions. The resident council that empowers residents to work together on agreeable compromises can manage some concerns. Facility management should always be open to hearing concerns, comments, and suggestions from the council.

It is ideal to have minimal interference from staff at the council meetings. Occasionally, the council may request a department head be present when individual departments are discussed. This creates immediate answers and can reduce some frustration with the residents. However, it is important that staff avoid false promises and quick reactions.

Once a meeting is completed, the resident council representative generally meets with the administrator and department head staff to address all concerns presented at the meeting. Department heads should then investigate the issues and respond to the council regarding the concerns and corrections. The resolutions should be documented and followed up on as soon as possible.
Family Councils

A family council is an organized group of relatives or friends of assisted living residents that meets regularly to discuss issues and concerns about the facility. While the primary purpose of a family council is for families, as a group, to influence the quality of care for residents, it also offers a forum to enhance communications with facility staff and offer peer support for the relatives and friends of residents.

In the area of complaints, family councils present a unified voice to resolve mutual concerns. This group is especially helpful for residents who cannot verbalize their concerns, such as residents with memory impairment. For optimal use, it is important that family council members recognize the whole assisted living community and not just those residents of the family members in attendance. An effective family council may submit concerns in writing to the administrator.

If an administrator is attuned to the families’ concerns and makes every effort to resolve them efficiently, then family councils can be very effective and beneficial. Issues get resolved and improve not only the quality of care, but also the quality of life. When family members understand what goes into making the community work, and the “why” behind the procedures, it makes them feel a part of the community and assists them in understanding the complexity of running a quality community.

Turning Complaints Into Compliments

Turning complaints into compliments can be achieved with a strong commitment by management and staff to continuously improve the quality of service delivered to residents and families. It takes training, patience, and a mature attitude toward accepting criticisms. Customer satisfaction can be maximized with an effective complaint process. When staff consistently addresses resident and family concerns, the facility can attain the highest levels of customer service. The rewards can be significant for both residents and the facility staff.
Date

Dear [Resident or Family Member’s Name],

This is to acknowledge your [letter, phone call or conversation] [dated or on] [date] regarding [resident’s name]. We at [facility name] strive to deliver quality care each day to all of our residents. Your [letter, phone call or conversation] has been referred to my management team for review and appropriate action. We value your comments and consider it an opportunity to work together to continue to meet the needs of [resident’s name].

If you have any questions about this issue, please contact [staff contact name and title] at [phone number]. You can generally reach [staff contact name] from [hours of availability].

We appreciate your pointing out areas of concern and hope we can continue to work together. To this end, we would be happy to schedule a meeting with the team at [facility name] to review your concerns. Your satisfaction is very important to us.

Sincerely,

Assisted Living Administrator

(Reprinted from “The Facility-Based Risk Management Program”)
# Sample Form For Recording Resident Family Complaints/Concerns

<table>
<thead>
<tr>
<th>Person Voicing Concern</th>
<th>Date</th>
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<tbody>
<tr>
<td>Resident’s Name</td>
<td>Unit #</td>
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**How to Contact:**

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<thead>
<tr>
<th>Address</th>
<th>Day Phone</th>
<th>Evening Phone</th>
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**Describe the complaint/concern:**

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**Expectations of person voicing concern:**

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**Referred to:**

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<th>Dept.</th>
<th>Date of Referral</th>
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**Findings:**

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**Actions Taken:**

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**Reportable to an outside agency?**

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<th>Yes</th>
<th>No</th>
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**If yes, was this reported?**

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<th>Yes</th>
<th>No</th>
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**To whom:**

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**Investigation findings reported to person voicing concern?**

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<th>Yes</th>
<th>No</th>
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**How?**

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<tr>
<th>In-person</th>
<th>In writing</th>
<th>Telephone</th>
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**Notes:**

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**Person voicing concern satisfied with findings and action?**

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<th>Yes</th>
<th>No</th>
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**Person Completing Inquiry**

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(Reprinted from “The Facility-Based Risk Management Program”)