

Creating and Implementing a Complaint or Feedback Handling Policy and Process

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Glossary

Appeal: Specific type of Complaint: an insurance coverage request was denied by PEBA or PEBA's vendors, and a covered individual is requesting reconsideration of the denial.

Complaint: Expression of dissatisfaction.

Compliment: Expression of praise.

Escalating: Acting to bring information to the attention of the appropriate PEBA staff members.

Feedback: Information about reactions to performance.

Negative Feedback: *See* Complaint

Neutral Feedback: Impartial Feedback with no strongly negative or positive features.

Positive Feedback: *See* Compliment.

Grievance: Specific type of Complaint for which a formal handling process is already in place. Not an Appeal.

Resolving: Finding a solution or settling an issue.

Problem Statement

The South Carolina Public Employee Benefit Authority (PEBA), which was created on July 1, 2012, is the state agency responsible for the administration and management of the state's employee insurance programs and retirement systems. Approximately 850 employers participate in state's employee insurance programs and retirement systems. More than 436,000 people are enrolled in the employee insurance programs and nearly 549,000 members are enrolled in the retirement systems.¹

PEBA's core values include: being 1) solutions oriented by anticipating the needs of its members, colleagues, and supervisors, and working daily to improve processes and increase customer satisfaction, and 2) communicative by encouraging and facilitating the flow of information, listening effectively, and being receptive to constructive feedback.

In line with PEBA's core values, the objective for this project is to research PEBA's current complaint handling policy and process and make recommendations for creating an agency-wide complaint handling policy and process.² Currently, there are multiple pathways for complaints to be communicated to PEBA. Complaints enter the agency through multiple access points: web chat, social media, in person visits, emails, letters, and phone calls directed to the agency, PEBA Board of Directors, PEBA work areas, or individual staff members. There is no clear method for capturing complaints and routing them to the appropriate PEBA personnel.

PEBA currently has specific appeals processes regarding insurance and retirement benefits; these appeals processes are communicated to state employees and retirees. However, these

¹ See South Carolina Public Employee Benefit Authority, *About Us: Who We Are* (last visited January 30, 2019), <http://www.peba.sc.gov/aboutus.html>.

² While this project was solely based on gathering data regarding complaints, the term complaint has negative connotations. Data capturing of complaints will not capture positive feedback (compliments) or neutral feedback, both of which may provide a useful data source. For future internal discussions, external communications, and PEBA's process and policy development, it may be more useful to build the framework around feedback rather than complaints.

processes are narrowly defined and only address appealable issues. Many other non-appealable issues (complaints) cannot be addressed within the available appeals processes. Such complaints are raised on a daily basis to PEBA and include customer service issues, policy concerns, technical issues, reports of problems, and general feedback, comments, opinions, and expressions of interest or concern. By creating an agency-wide complaint handling policy and implementing an effective complaint handling process, PEBA could have the opportunity to improve the experience of staff, and state employees and retirees.

Data Collection

As noted in the *Problem Statement*, the intention for this project is to research PEBA's current complaint handling policy and process, and make recommendations for creating an agency-wide complaint handling policy and process. At the outset of the project, data was to be collected to determine:

1. The types of complaints received by PEBA;
2. The PEBA work areas and staff members receiving complaints;
3. The number of complaints received by each PEBA work area;
4. The methods of submission of the complaints;
5. The number of complaints received per each method of submission;
6. The average age of complaints; and
7. Staff satisfaction with how complaints are handled.

The method of data collection would be internal surveys, supplemented by in person discussions. The sources of data would be responses provided by work area supervisors. This method and these data sources were chosen because the supervisors could provide background about their current positions, staff, and processes, and would be best situated to coordinate providing the requested

data. Each individual work area used different data sources, including Excel spreadsheets, an Access database, email inboxes, and social media channels.

To start, I met with my two supervisors and PEBA's Chief Operating Officer (COO). Together we determined PEBA has four work areas where complaints typically enter PEBA, with different handling and documentation procedures for each area. PEBA's COO helped coordinate my discussions with the three other work areas for information gathering. The supervisors for these work areas, specifically PEBA's Employer Services Director, Communications Director, and Customer Contact Center Manager, provided valuable assistance with the data collection for this project. PEBA's four work areas are described below.

Insurance Appeals Division (IAD): My work area, the IAD, manages appeals. All appeals are complaints, but not all complaints are appeals. An appeal is a specific type of complaint: an insurance coverage request was denied by PEBA or PEBA's vendors, and a covered individual is requesting reconsideration of the denial. The IAD handles appeals-related communications from the public, other PEBA work areas, and PEBA's vendors. If the IAD receives a complaint separately from an appeal, the IAD will forward the complaint to the appropriate work area. However, complaints are sometimes embedded in the appeal. For example, an appeal could state:

I believe my medical device should be covered because it is medically necessary. I really need this device to improve my quality of life. I am frustrated that PEBA does not cover it; I think PEBA's decision is unfair and PEBA should cover this medical device for all members as a matter of policy.

Historically, if the IAD received a complaint embedded in an appeal (as noted in the underlined portion above), the complaint, unless directly related to the IAD's appeal process, was not addressed.

The IAD recently began working more closely with other PEBA work areas, to improve the appeals process and address topics mentioned in complaints. If the IAD notices a particular complaint or complaint trend is about a topic that PEBA (via its policies, communications, or operational procedures) can address, then the IAD escalates the complaint by alerting the appropriate PEBA staff for assistance. The escalation sometimes is sent to PEBA's COO and Executive Director. The complaint is researched and ultimately a PEBA policy or practice may change.

The IAD has not tracked the type, number, age, or outcome of complaints. For this project's data collection, the IAD used its Access database and the scanned copies of appeals.

Employer Services: This work area helps participating employers administer insurance and retirement benefits. Field Services, part of the Employer Services work area, offers training and assistance onsite at participating employers. Employer Services receives comments and feedback from employers and members via email and while working in the field. All staff members address the comments. Like the IAD, if needed, each Employer Services staff member will alert other appropriate work areas in PEBA for assistance.

Similarly to the IAD, Employer Services does not track complaint statistics or data. For this project's data collection, Employer Services was only able to provide general information. The Employer Services Director provided this information in person and via email.

Communications: This work area manages all communications for the agency, internally and externally, in a variety of formats. Communications has several direct channels for people to voice concerns and receive assistance. These channels include two inboxes, a Board of Directors public policy comment form on PEBA's website, and social media (Facebook). Like the IAD and Employer Services, Communications receives complaints, and if needed, will alert other

appropriate work areas in PEBA for assistance. Communications has a specific method for handling complaints. Any routine inquiries to which Communications cannot respond, are sent to the Customer Service work area. Any escalated inquiries are sent to supervisors in PEBA's Policy or Operational work areas for research. Communications prepares a response, which is reviewed and approved by PEBA's Executive Leadership and Legal Department. For social media inquiries, Communications will ask the poster for contact information via a direct message asking to take the conversation offline – especially when the posting is sharing personal health information.

Similarly to the IAD and Employer Services, Communications does not track complaint statistics or data. For this project's data collection, The Communications Director discussed the above background information in person and via email, and reviewed Communications' email inboxes and social media channels to calculate complaint volume.

Customer Contact Center (CCC): This work area is the hub for all calls from subscribers and employers to PEBA. The CCC has several methods for people to voice concerns and receive assistance; these methods include phone, email, and a chat feature on PEBA's website. In September 2016, PEBA added a survey feature to its calls. As of January 1, 2018, PEBA's new CCC manager improved the survey by shortening the survey, leaving the survey open ended, and offering the survey at the beginning and end of calls. The CCC has been collecting and organizing the data from the recorded surveys. Each week two CCC staff members add information from the survey to a spreadsheet. The CCC manager reviews it, and any topics the CCC can address are addressed. Currently, the surveys and data collection are held only within the CCC with a current aim of improving CCC processes, and the broader PEBA implications have not yet been explored.

The CCC survey spreadsheet shows how one work area of PEBA is already capturing, organizing, and retaining data – including complaints and positive feedback. Because the improved

survey and data collection are a new process, the information has not yet been communicated to any area of PEBA outside of the CCC.

For this project's data collection, the CCC Manager discussed the above background information in person and provided access to the CCC spreadsheet.

Data Analysis

1. The types of complaints received by PEBA. *See Appendix A.* PEBA receives various types of complaints. Each work area categorizes its own complaints differently, and the types of complaints vary, but there are multiple commonalities. In general, these complaints can be classified as: beyond PEBA's control, within PEBA's influence, and within PEBA's control. *See Appendix B.* The data shows nearly all complaints, except for those involving federal laws, are within the scope of PEBA's control or influence.

There is overlap across work areas. For example: The IAD receives complaints within the purview of the CCC and Communications, Employer Services receive complaints within the purview of the CCC and Communications, Communications receives complaints within the purview of the IAD, and the CCC receives complaints within the purview of Communications and Employer Services.

2. The PEBA work areas and staff members receiving complaints. *See Appendix C.* The four PEBA work areas currently have a total number of 68 staff members. Of the total, 23 staff members, of which 13 are supervisors, are currently involved in resolving or escalating complaints; 8 staff members are currently assisting with complaint data collection and analysis. The data shows multiple PEBA staff members are already involved in handling complaints as part of their work flow.

3. **The number of complaints received by each PEBA work area.** *See Appendix D.* If appeals are included in the total number of complaints, based on the available data from just three of PEBA's work areas, PEBA received 1,077 complaints over a 10-month period during 2018.³
4. **The methods of submission.** *See Appendix E.* Each work area has 4 to 6 methods of complaint submission, and some of those methods such as phone and email, are routed to multiple lines and inboxes. All of the work areas receive complaints via email and reports from other work areas. Each work area also has distinctly different means of receiving complaints. For example: The IAD receives some complaints via mail, Employer Services receives some complaints through meetings with employers, Communications receives some complaints through Social Media (Facebook), and the CCC receives some complaints through its Chatbox.

The data shows each work area receives complaints through the channels made available by that particular work area. The contact information for these work areas in internal and in external communications, except for reports from other work areas, correlate to the methods of submission. The reports from other work areas show PEBA already reroutes at least some complaints to the appropriate PEBA work areas.

5. **The number of complaints received per each method of submission.** *See Appendix F.* The IAD and Employer Services did not have this information. Communications received 281 complaints via email; 171 to the Communications inbox and 110 to the Media Inquiries inbox. Communications also received 40 complaints via Social Media (Facebook) and 25 complaints via the Board of Directors public policy comment form on PEBA's website. The CCC received all 380 complaints via survey responses. The CCC did not have information regarding the other methods such as the Chatbox, email, and reports from other work areas.

³ Employer Services had no data. The data for the IAD and CCC was collected from 1/1/2018 through 10/31/2018. Communications collected an additional week of data, from 1/1/2018 through 11/8/2018. *See Appendix D.*

The data shows Communications receives most of its complaints via email, with only a few through the Board of Directors public policy comment form on PEBA's website. The low number submitted via the form, may be due to current terminology and accessibility.

The form states its purpose is to "provide an opportunity for public policy comments and feedback on issues that impact the programs and plans [the Board of Directors] oversees."⁴

The form's stated purpose is twofold: a channel for providing public policy comments and feedback regarding other issues. The form is available on PEBA's website, after opening the *PEBA Board* page and *Public policy comments* link. For an individual seeking to leave feedback, locating the form, based on its current title, would be difficult.

The data shows the CCC captures all its complaint data via survey responses. I was unaware at the beginning of this project that the CCC was compiling survey data, but this data has proven to be the most organized, detailed, and useful dataset for this project. There are some limitations to the current CCC survey data set. This is the largest and most in depth source of data, but it is a small pool compared to the amount available. As noted above, complaints submitted to the CCC via other methods are not captured, and survey use is not yet maximized. For example, during October 2018, out of 31,644 calls, only 350 callers took the survey, and only 28 survey responses were complaints.⁵ The remainder either provided no response, positive feedback, or neutral comments. The CCC Manager is currently working on his own process improvement to encourage survey participation.

⁴ South Carolina Public Employee Benefit Authority, *Public Policy Comments* (last visited January 31, 2019), <https://www.peba.sc.gov/contact/publicpolicy/comments.htm>.

⁵ PEBA CCC, *Spreadsheet: Survey Summaries Jan through Oct 2018* (last visited January 31, 2019).

6. **The average age of complaints.** None of PEBA's four work areas have information regarding the age or average age of complaints. While this information is not currently tracked, it may be useful as PEBA's complaint handling process develops.
7. **Staff satisfaction with how complaints are handled.** This was intended to be an agency-wide survey as part of initial data gathering but would be better suited for a later phase. If PEBA decides to develop and implement a complaint handling process, PEBA's COO would prefer a carefully worded survey during the development and implementation phase.

Summary

The overall data confirms complaints exist and there are multiple pathways and access points for complaints to be communicated to PEBA. The data confirms multiple staff members are involved in receiving and resolving complaints. The data also shows separate work areas already route complaints to appropriate personnel. However, the data also shows there is no clear, preferred, or central place for members to provide feedback, nor a central repository for this feedback for PEBA's decision makers to review. There is no current PEBA policy or process; complaint handling is up to the individual work areas. Further, PEBA's captured complaint data is a very small subset of what could be available. This project focused on three of nearly 20 different work areas. There is an opportunity for complaints to be collected, organized, appropriately routed, and documented once reviewed or resolved. This information could be very valuable for evaluating the effectiveness of PEBA's services, policies, and processes, and would highlight what PEBA is doing well and where PEBA may improve.

Recommendations, Implementation Plan, and Evaluation Methods

- A. PEBA's CCC manager should share the CCC's survey data and collection methods with PEBA's COO. The CCC's data collection, methods, and spreadsheet format was originally the

idea of PEBA's CCC manager as part of his process improvement initiative. PEBA's CCC manager should have the first opportunity to share (via his own narrative) his initiative's history, process, data, results, and work area impact with his supervisor, the COO. The timeframe for this recommendation should be as soon as possible. However, the timeframe and depth of the presentation would be left to the CCC manager, because this is his initiative. There should be no costs or resources needed, or obstacles which cannot be overcome. The action steps needed would be my making this project available for the CCC manager's review, and then his communication with the COO.

B. PEBA administration, the COO and/or Executive Director, should review this project to confirm if additional steps are warranted or if the recommendations below should be researched or implemented. The review should begin once this project is approved. The timeframe for the duration of the review would be left to PEBA administration. There should be no costs or resources needed, or obstacles which cannot be overcome. The action steps needed would be project approval, making this project available for PEBA administration's review, PEBA administration providing instructions for proceeding, and staff action on those instructions. These same action steps would apply to all the recommendations below.

C. PEBA should confirm with its Board of Directors, the purpose of the Board of Directors public policy comment form. If the purpose is to provide a means for the public to contact the Board of Directors to provide feedback on any issue, then the current format may need revision. PEBA should also confirm whether it wants to make providing feedback easier and more accessible to the public. This determination will require balancing PEBA valuation of customer service and feedback with the likely increase in staff time spent addressing the feedback, and an increased public expectation that a timely response will be provided.

1. If the purpose is as described above, then revising the current format is recommended. The current public policy comment form and any cross references could be removed from PEBA's website. A link/button could be added on the current home page directly below the "Customer Service Chat Now" button. In the alternative, a heading and link for "Feedback" could be added to the "Contact us" page. The new Feedback link could be attached to a new Feedback Form (to replace the public policy comment form). For a draft of this Feedback Form, *see Appendix I.*⁶
2. The determination made by PEBA regarding the ease and accessibility of feedback provision will impact the degree to which recommendations C through F are implemented.
3. Initiating this recommendation is dependent upon PEBA administration's instruction, and the timeframe for executing this recommendation would depend upon the instruction provided, because potentially several areas: PEBA administration, Board of Directors, Legal Department, Communications, and IT would be involved. There would be no additional costs or obstacles which could not be overcome with PEBA administration's support. The resources required would be staff time.

D. PEBA should engage in ongoing data collection and designate which work areas will be responsible for the collection, determine which data points are most valuable, define where and how data should be stored, and specify the function, timing, and structure of any reports.

1. The CCC is already engaged in ongoing data collection. The IAD already collects data regarding appeals, but not all complaints received. The IAD can easily incorporate

⁶ Appendix I is based on modifying the current form found here: South Carolina Public Employee Benefit Authority, *Public Policy Comments* (last visited January 31, 2019), <https://www.peba.sc.gov/contact/publicpolicy/comments.htm>.

additional complaint information into its database for ongoing data collection. Employer Services and Communications does not collect data; Communications found the data for this project via retroactive review. The two work areas, the CCC and IAD, should continue to collect data and refine their process. To conserve staff time and resources, no data collection from other work areas should occur until recommended by PEBA administration. The usefulness of the data being gathered should be fully explored before expanding data collection to other work areas or throughout PEBA.

2. The most valuable data points identified in this project are: the types of complaints received (organized by the classifications described in Appendix B), the number of complaints received by each work area, and number of staff members receiving complaints. Additional data points could include: 1) staff satisfaction with how complaints are handled, 2) the types of resolutions, 3) identifying information about the individual making the complaint such as (employee/retiree status or Employer group number), and 4) positive and neutral feedback. PEBA, as a whole, may identify other data points or choose to value the recommended data points differently.
3. The CCC currently stores its data in a spreadsheet. Each work area responsible for collecting data could have a similar spreadsheet, with the categories modified to be the most appropriate for each individual work area and stored on PEBA's network and accessible to all necessary staff members.
4. Each work area usually compiles end of the year reports to be used for annual evaluations and upper management's review. Work areas may compile additional reports based on its supervisor's preferences. For example, the IAD compiles an additional mid-year report, and performs internal monthly and weekly audits. PEBA's insurance work areas meet twice

a month in an insurance updates meeting. The timing of reports could be monthly, as an attachment and discussion point for one of the monthly insurance updates meetings. A large report highlighting data trends could be compiled at the end of the year for review by PEBA administration. PEBA administration would need to determine the preferred areas of focus and format of these reports.

5. Initiating these recommendations is dependent upon PEBA administration's instruction, and the timeframe for execution would depend upon the instruction provided. Multiple discussions and meetings would need to occur to effectively coordinate. There would be resources used, due to the increased demand on staff time. There could be increased costs if additional personnel were hired as a result of these recommendations; this would be an obstacle. With PEBA administration's support this obstacle could be overcome by resource and staffing reallocations. These implementation requirements would also apply to recommendations E and F below.

E. PEBA should use the results of its data collection to improve the areas within PEBA's control or influence. The areas of PEBA's control and influence are described in *Appendix B*. Coordinating improvements would require significant coordination across PEBA's work areas. How that coordination would occur, the formality of interactions, and the documentation of the improvements would vary depending on the work areas and the topic involved.

F. PEBA may choose to develop and implement a formal Complaint Handling Policy or formal Feedback Handling Policy. The chosen policy would provide guidance to staff on how

complaints or feedback should be managed. A draft Complaint Handling Policy can be found in *Appendix G* and a draft Feedback Handling Policy can be found in *Appendix H*.^{7,8}

The evaluation of the above recommendations would depend on the options selected by PEBA management. By utilizing at least an end of the year report, PEBA will be able to spot trends and act on any potential areas of improvement.

⁷ The draft Complaint Handling Policy is based on the following framework: NSW Ombudsman, *Complaint Handling Model Policy* (last visited December 1, 2018), https://www.ombo.nsw.gov.au/data/assets/word_doc/0018/26217/Complaint-handling-model-policy-word-template.docx.

⁸ The draft Feedback Handling Policy is based on some portions of Appendix G and the following framework: Victoria State Government: Neighbourhood Houses Victoria, *Compliment and Complaint Management Policy* (last visited December 1, 2018), <https://www.nhvic.org.au/documents/item/647>.

Appendix A: Types of Complaints Received By PEBA

		Insurance Appeals Division (IAD)	Employer Services	Communications	Customer Contact Center (CCC)
Types of Complaints	Government	Federal or State Laws	PEBA	PEBA	Government
		<ul style="list-style-type: none"> • Statutes, Regulations, and Provisos 	Plan (Contract Rules)	Plan (Contract Rules)	Federal regulations
			<ul style="list-style-type: none"> • Coverages 	<ul style="list-style-type: none"> • Coverages 	
			Communications	Policies	PEBA
			<ul style="list-style-type: none"> • Publications • Website • Newsletter articles 	Communications	Plan (Contract Rules)
				<ul style="list-style-type: none"> • Newsletter articles • Emails 	Policies
					Communications
			Customer Service and Technology	IAD-related appeals	Customer Service
			<ul style="list-style-type: none"> • Employer and member portals <ul style="list-style-type: none"> ○ Operational errors ○ Improvements 	Insurance and retirement benefits queries	<ul style="list-style-type: none"> • Call reason not addressed • Counselor (specific CCC representative) issues • Wait Time • No survey response (or negative survey statement was false based on call recording)
			PEBA and Vendors	<ul style="list-style-type: none"> • Classified as: escalated, routine, or miscellaneous 	Customer Service and Technology
		Policies		<ul style="list-style-type: none"> • Dropped call, phone connection, phone tree 	
		Procedures		PEBA, Employers, and Vendors	
				Processing	
				Employers	
				Benefits Administrator (BA) error	

Appendix B: Additional Complaint Classification

Within PEBA's Control



- Plan (Contract Rules) ■ Policies ■ Communications
- Customer Service ■ Technology ■ Procedures
- Appeals ■ General Inquiries ■ Processing

Within PEBA's Influence



- State Laws
- Employers: Policies, Communications, Customer Service, Processing, and BA Errors
- PEBA's Vendors: Policies, Communications, Customer Service, Processing, and Procedures

Beyond PEBA's Control: Federal Laws

Appendix D: Number of Complaints Received Per PEBA Work Area

	Number of Complaints	Time Period
Insurance Appeals Division (IAD)	355 matters received; of those, <u>307</u> were appeals with <u>44</u> additional embedded complaints	1/1/2018-10/31/2018
Employer Services	Unavailable – could not be compiled	Unavailable
Communications	<u>346</u> complaints	1/1/2018-11/8/2018
Customer Contact Center (CCC)	3,552 survey responses; of those, <u>380</u> were complaints	1/1/2018-10/31/2018

Appendix E: Methods of Submission

	Insurance Appeals Division (IAD)	Employer Services	Communications	Customer Contact Center (CCC)
Methods	Email	Email	Email	Email
	<ul style="list-style-type: none"> • 6 staff email addresses • 2 separate inboxes <ul style="list-style-type: none"> ○ General Appeals ○ Urgent Appeals 	<ul style="list-style-type: none"> • 10 staff email addresses • 3 separate inboxes <ul style="list-style-type: none"> ○ Employer Services ○ Field Services Insurance ○ Field Services Retirement 	<ul style="list-style-type: none"> • 5 staff email addresses • 2 separate inboxes <ul style="list-style-type: none"> ○ Communications ○ Media Inquiries 	Chatbox
	Fax			Phone
	Phone	Employer advisory group meetings	Board of Directors public policy comment form on PEBA's website	Reports from other work areas
	Mail	Employer meetings and visits	Social media (Facebook)	
	Hand delivery	Employer seminars, trainings, and benefits fairs	Reports from other work areas	
Reports from other PEBA work areas	Reports from other work areas			

Appendix F: Number of Complaints Received Per Each Method of Submission

	Methods				Total
Insurance Appeals Division (IAD)	Unavailable – could not be compiled				
Employer Services	Unavailable – could not be compiled				
Communications	Communications inbox	Media Inquiries inbox	Board of Directors public policy comment form on PEBA’s website	Social Media (Facebook)	
	171	110	25	40	346
Customer Contact Center (CCC)	Survey responses				
	Other methods such as Chatbox, email, and reports from other work areas could not be compiled				380

Appendix G: Draft Complaint Handling Policy

I. Introduction

A. Purpose. This policy is intended to ensure PEBA handles complaints fairly, efficiently, and effectively. This complaint management system is intended to:

- Enable PEBA to respond to issues raised by those making complaints in a timely and cost-effective way
- Boost public confidence
- Provide information that can be used by PEBA to deliver quality improvements in PEBA’s policies, services, staff, and complaint handling.

This policy provides guidance to PEBA’s staff and those who wish to make a complaint, on the key principles and concepts of PEBA’s complaint management system.

B. Scope. This policy applies to all staff receiving or managing complaints, regarding PEBA’s policies, services, staff, and any other areas within PEBA’s control or influence.

HR and discrimination grievances, claims, appeals, and litigation are handled through separate mechanisms.

C. Commitment. PEBA expects staff at all levels to be committed to fair, effective, and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way this commitment should be implemented.

Who	Commitment	How
PEBA’s Executive Director	Promote a culture valuing complaints and their effective resolution	Provide adequate support and direction to key staff responsible for handling complaints Regularly review reports about complaint trends and issues arising from complaints Encourage staff to be alert to complaints and assist promptly with resolving complaints Encourage staff to make recommendations for improvements Support recommendations for improvements arising from the analysis of complaint data

		Recognize and reward effective complaint handling by staff
PEBA's Managers Responsible for Complaint Handling	Manage PEBA's complaint management system	<p>Provide regular reports to PEBA's Executive Director on issues arising from complaint handling work</p> <p>Ensure recommendations arising out of complaint data analysis are approved by PEBA's Executive Director and implemented where appropriate</p> <p>Train and empower staff to resolve complaints promptly and in accordance with PEBA's policies and procedures</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve PEBA's complaint management system</p> <p>Encourage staff to be alert to complaints and assist promptly with resolving complaints</p> <p>Recognize and reward effective complaint handling by staff</p>
Staff Whose Duties Include Complaint Handling	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including those who make complaints</p> <p>Assist people to make a complaint, if needed</p> <p>Stay informed about best practice in complaint handling</p> <p>Provide feedback to management on issues arising from complaints</p> <p>Provide suggestions to management on ways to improve PEBA's complaint management system</p>

		Implement changes arising from individual complaints and from the analysis of complaint data as directed by management
All Staff	Understand and comply with PEBA's complaint handling practices	<p>Treat all people with respect, including those who make complaints</p> <p>Be aware of PEBA's complaint handling policies and procedures</p> <p>Assist people with accessing PEBA's complaint process, if needed</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly</p> <p>Provide feedback to management on issues arising from complaints</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>

II. Terms and Definitions

Complaint. Expression of dissatisfaction made to or about PEBA regarding PEBA's policies, services, staff, and any other areas within PEBA's control or influence.

A complaint covered by this Policy can be distinguished from HR and discrimination grievances, claims, appeals, and litigation; these items are handled through separate mechanisms. Responses or requests for feedback are not considered complaints for the purposes of this Policy.

Complaint Management System. All PEBA policies, procedures, practices, and personnel involved in the management of complaints.

Feedback. Opinions, comments, and expressions of interest or concern.

Policy. A statement or instruction describing how PEBA should fulfill its vision, mission, and goals.

Procedure. A statement or instruction describing how PEBA's policies will be implemented and by whom.

III. Guiding Principles



A. Facilitate Complaints. PEBA is committed to seeking and receiving feedback and complaints regarding PEBA’s policies, services, staff, and any other areas within PEBA’s control or influence.

Any concerns raised in feedback or complaints will be handled within a reasonable time frame.

People making complaints will be:

- Provided with information about PEBA’s complaint handling process
- Provided with an accessible method to make a complaint
- Listened to and treated with respect by PEBA’s staff
- Provided with reasons for PEBA’s decision(s) and any options for resolution

B. Accessibility. PEBA will ensure the information about how and where complaints may be made is readily available and accessible, especially to those who may require assistance.

C. Response to Complaints. Where possible, complaints will be resolved at first contact with PEBA.

PEBA will promptly acknowledge receipt of complaints.

PEBA will assess and prioritize complaints in accordance with the urgency of the issues raised.

PEBA will advise people as soon as possible when PEBA is unable to handle any part of their complaint. PEBA will provide advice about where the complaint may directed (if known and appropriate).

PEBA will address each complaint with objectivity and fairness.

PEBA’s staff members are empowered to resolve complaints promptly. Adoption of flexible approaches is encouraged.

PEBA will assess each complaint on its merits.

PEBA will protect the identity of people making complaints, when appropriate and practical.

When a complaint involves multiple areas, within or beyond PEBA, responsibility for communicating with the person making the complaint will also be coordinated.

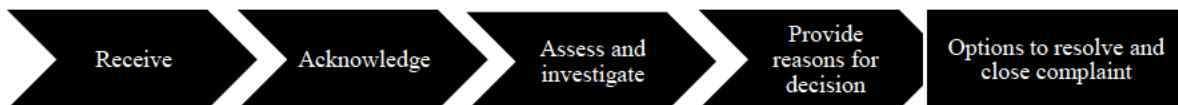
PEBA staff is encouraged to provide feedback on the effectiveness and efficiency of all aspects of PEBA's complaint management system.

Managing Unreasonable Conduct. PEBA is committed to being accessible and responsive to those who submit feedback or complaints. However, PEBA's success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety, and security of our staff
- Our ability to allocate our resources fairly across all complaints received

When people behave unreasonably in their dealings with PEBA, this conduct can significantly affect the progress and efficiency of our work. As a result, PEBA will take proactive and decisive action to manage any conduct that negatively and unreasonably affects PEBA and will support our staff to do the same in accordance with this policy.

IV. Complaint Management System



A. Introduction. When responding to complaints, staff should act in accordance with PEBA's complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. The 5 key stages of PEBA's complaint management system are described below.

B. Receipt of Complaints. The complaint and supporting information will be recorded.

The record of the complaint will document:

- The name and contact information of the person making the complaint
- Issues raised and the outcome desired by the person making the complaint
- Any other relevant information

C. Acknowledgement of Complaints. PEBA will acknowledge receipt of each complaint promptly, and preferably within 3 business days.

Consideration will be given to the most appropriate medium (call, email, or letter) for communicating with the person making the complaint.

D. Initial Assessment. After acknowledging receipt of the complaint, PEBA will confirm whether the issue(s) raised are within PEBA's control or influence. PEBA will also consider the outcome(s) sought by the person making the complaint. If more than one issue is raised, PEBA will determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, PEBA will consider:

- How serious, complicated, or urgent the complaint is
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed
- Whether resolution requires the involvement of other entities

E. Addressing Complaints. After assessing the complaint, PEBA will consider how to manage it. To manage a complaint, PEBA may:

- Provide the person making the complaint information or an explanation
- Gather information and investigate the claims made in the complaint
- Grant the requested outcome to the person making the complaint

F. Providing Reasons for Decisions. Following consideration of the complaint and any investigation, PEBA will contact the person making the complaint and advise them:

- The outcome of the complaint and any action taken
- The reason for PEBA's decision
- The remedy or resolution proposed or put in place

G. Closing the Complaint and Record Keeping. PEBA will keep records on:

- How PEBA managed the complaint
- The outcome(s) of the complaint
- Any outstanding actions that require follow-up

PEBA will ensure outcomes are properly implemented, monitored, and reported.

H. The Levels of Complaint Handling. PEBA will aim to resolve complaints at the first level, the frontline. Staff will be adequately equipped to respond to complaints, including being given appropriate authority, training, and supervision.

When this is not possible, PEBA may decide to internally escalate the complaint to more senior staff. This additional level of complaint handling will provide for the following internal mechanisms:

- Assessment and possible investigation of the complaint
- Facilitated resolution

V. Accountability and Learning

A. Analysis and Evaluation of Complaints. PEBA will ensure complaints are systematically recorded so information can be easily retrieved for reporting and analysis.

Regular reports will track:

- The number of complaints received
- The outcome of complaints
- Issues arising from complaints
- Systemic issues

Regular analysis of these reports will monitor trends. Reports and analysis will be provided to PEBA's Executive Director for review.

B. Monitoring of the Complaint Management System. PEBA will continually monitor the complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints
- Identify and correct deficiencies in the system's operation

C. Continuous Improvement. PEBA is committed to improving the effectiveness and efficiency of the complaint management system. PEBA will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- Recognize and reward exemplary complaint handling by staff
- Regularly review the complaint management system and complaint data
- Implement appropriate system changes arising out of PEBA's analysis of complaint data

Appendix H: Draft Feedback Handling Policy

I. Policy Statement

Compliments, complaints, and other forms of feedback provide valuable information on levels of satisfaction and provide PEBA with an opportunity to improve upon all aspects of service. Feedback is to be taken seriously and to be seen as an opportunity for improvement.

Feedback that is recorded and effectively handled will provide valuable information in identifying areas for improvement, coordinating a consistent approach for resolution, reducing the potential for future complaints, and allowing for reporting and efficient allocation of resources.

Resolving complaints at the earliest opportunity in a way that respects and values the person's feedback, can be one of the most important factors in recovering the person's confidence about PEBA's services. It can also help prevent further escalation of the complaint. A responsive, efficient, effective, and fair feedback management system will assist PEBA in achieving this.

II. Definitions

Complaint. Expression of dissatisfaction made to or about PEBA regarding PEBA's policies, services, staff, and any other areas within PEBA's control or influence.

Compliment. Expression of praise, encouragement, or gratitude made to or about PEBA regarding PEBA's policies, services, staff, and any other areas within PEBA's control or influence.

Feedback. Opinions, comments, and expressions of interest or concern.

III. Guiding Principles

An effective feedback handling system supports PEBA's core values of being solutions oriented, communicative, credible, collaborative, responsive, emotionally intelligent, and ethical.

An approach to feedback management supports:

- Individuals understanding their rights and responsibilities
- Information on the feedback management process being easily accessible
- Increased satisfaction of clients in the management of their feedback
- The recording of data to identify emerging and existing trends or systemic issues
- Staff to demonstrate an awareness of feedback management processes
- Staff to develop the range of skills and capabilities required to manage feedback
- An organizational culture that is focused on effective complaint resolution and utilizing feedback for continuous improvement

IV. Visibility and Accessibility

The feedback management process will be visible and accessible to individuals and:

- Explain how and where to provide feedback
- Ensure PEBA’s website and publications have information on how to provide feedback
- Consider specific needs of the individual or barriers they may experience
- Explain how PEBA will manage feedback
- Support individuals to identify and seek their preferred outcome.

V. Responsiveness

The feedback management process will be responsive and provide mechanisms and strategies to:

- Inform and train staff to use the feedback management system
- Support individuals to seek the most appropriate resolution
- Ensure there is clarity about the requested outcome
- Provide a respectful and informative acknowledgement
- Monitor timeframes for resolution
- Communicate with all relevant parties about progress through the process

VI. Assessment and Investigation

The feedback management process will have mechanisms to:

- Assess and prioritize complaints in accordance with the urgency of the issues raised
- Collect adequate and appropriate information
- Protect the identity of the individual making the complaint, when appropriate and practical
- Determine who and at what level the complaint should be dealt with

VII. Improvement Focused

The feedback management system will provide mechanisms and strategies to gather and record feedback and other information to:

- Meet any policy or procedural reporting requirements
- Improve the training and capabilities of staff
- Analyse the data and identify trends

VIII. Service Excellence

PEBA is committed to improving the effectiveness and efficiency of the feedback management system. PEBA will:

- Support the making and appropriate resolution of complaints
- Implement best practices in feedback handling
- Recognize and reward exemplary feedback handling by staff
- Regularly review the feedback management system and data
- Implement appropriate system changes arising out of PEBA’s analysis of the data

IX. Feedback Management Process

The feedback management process can be simplified into four steps: 1) Receive, 2) Record, 3) Resolve, 4) Communicate resolution

1. Receive

- Listen to the feedback
- Ask what outcome the individual is seeking
- Inform the individual clearly of the feedback management process, and set realistic expectations
- Assess the situation to determine whether the issue(s) raised are within PEBA's control or influence. If more than one issue is raised, determine whether each issue needs to be addressed separately. Consider:
 - How serious, complicated, or urgent the issue is
 - How the individual providing the feedback is affected
 - The risks involved if resolution is delayed
 - Whether resolution requires the involvement of other entities
- Acknowledge receipt of the feedback promptly

2. Record

- Record relevant information. The record will document:
 - The name and contact information of the individual
 - The issue raised and outcome desired by the individual
 - Any other relevant information
- Store the information in the feedback management system for tracking and future data analysis

3. Resolve

For resolution, PEBA may:

- Immediately provide the individual information or an explanation
- Grant the requested outcome
- Gather information and investigate the feedback provided

PEBA will keep records on:

- How PEBA managed the feedback
- The outcome(s)
- Any outstanding actions requiring follow-up

PEBA will ensure outcomes are properly implemented, monitored, and reported.

4. Communicate Resolution

After consideration and any investigation, PEBA will contact the individual who provided the feedback and advise them:

- The outcome and any action taken
- The reason for PEBA's decision
- The remedy or resolution proposed or put in place

Appendix I: Draft Feedback Form

Feedback

The South Carolina Public Employee Benefit Authority (PEBA) serves the public employees covered by the insurance and/or retirement plans the agency administers through the state's public employers. As part of its stewardship, PEBA wants to provide an opportunity for feedback on issues that impact the programs and plans it oversees.

Please complete and submit this online form if you have feedback that you would like to share.

Full name:

Telephone:

Email address:

Select the option that best describes you:

- Active member Retired member Participating employer
- General public Association Vendor/contractor
- Other (inactive, beneficiary, survivor or COBRA)

Select the general subject of your feedback:

- Insurance programs Retirement plans S.C. Deferred Compensation Program
- Board of Directors Agency operations

Comments:

(Limited to 500 characters)

Submit

Clear