

Incident
Resolution
Process

2014

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DEFINITIONS

Customer Service Representative: Any agent located in the Call Center.

Client Relations Representative: Any agent who works specifically with clients (providers) located in the Client Relations Department.

Interpreter Relations Representative: Any agent who works specifically with interpreters located in the Interpreter Relations Department.

CTS Main: CTS's internal system to manage all interpreters, jobs, and incidents.

Invalid: Such as, but not limited to: Public road closure notices two (2) or more days advance notice; forgot appointment; cancelled wrong appointment; overbooked schedule; vacation;

Valid: Such as, but not limited to: Unexpected travel emergencies (i.e. road closures, traffic accident, flat tire,); illness or medical emergency of self or family; reports obstacles to practice per code of ethics; previous appointment ran long; inaccurate or incomplete information given by requestor; or other extenuating circumstances (see definition).

Verbal Notification: Interpreters will receive a phone call from CTS.

Written Notification: Interpreters will receive a system-generated email of an incident in their portal.

Extenuating Circumstances: Death in the family; serious illness of family or self; incapacitation of self; fire or other form of destruction to immediate household family to self; an unanticipated event or difficulty beyond the Interpreter's control. For severe actions, proof may be required.

Portal Restriction: Action taken due to Interpreter's actions and amount of incidents. Interpreter's portal will only show and allow acceptance of Emergency Appointments and appointments for which the Interpreter has been requested according to the continuity of care guidelines.

Full Portal Restriction: Action taken to Interpreter's multiple actions and amount of incidents. Interpreter's portal will not show ANY jobs nor allow Interpreter to accept ANY jobs. In addition, all jobs during the restriction period that the Interpreter has been assigned to will be removed from their schedule.

Emergency Basis Appointment: An appointment that has not been filled within 48 hours of the requested start time.

Interpreter Incident Report: A report of compiled information to record details of an unusual event conflicting with the Code of Conduct.

Suspension: An Interpreter may be temporarily suspended immediately following the notification of a Safety or Health Violation, being charged or convicted of a felony, or a misdemeanor directly related to the performance of the interpreter's professional duties.

Termination of Contract: An Interpreter may be suspended indefinitely from servicing the HCA/DSHS contract following an investigation and founding of multiple incidents in any severity level.

Unrated – Classifies any violation against the Code of Conduct that has the least amount of impact on the appointment, provider and LEP.

Severity Level: Capacity in which the violation of the Code of Conduct is measured.

Low severity – Classifies any violation against the Code of Conduct that has minimal impact on the appointment, provider and LEP.

Example:

- Interpreter arrives late without valid reason.
- Returning of assignments (less than 24 hours without a valid reason)
- Re-occurring returning of assignments (less than 24 hours with a valid reason)

Example:

- Accumulation of four (4) calls returning assignments (on different dates) with valid reason per month may equal 1 low severity. (looking for a pattern i.e. returning assignments every Monday)

Medium severity – Classifies any violation against the Code of Conduct that has a Moderate impact on the appointment, provider and LEP.

Example:

- Interpreter is a “no show, no call” to appointment without a valid reason
- Interpreter solicits for their services.
- Interpreter expresses personal opinions; offers services other than interpreting/translating.
- Harassment to provider or clients

High severity – Classifies any violation against the Code of Conduct that has a significant impact on the appointment, provider and LEP; including those that put the health and safety of all parties involved at risk.

Example:

- Interpreter requests money or favors from LEP or provider.
- Interpreter passes their appointments to others without CTS knowledge and approval.
- Requesting provider to enter incorrect start and/or end times.
- Any violation to HIPAA, or to the Health and Safety of the patient.

INTRODUCTION

In our Interpretation Division, we remain focused on continuous improvement, as we believe it is a cornerstone to good customer service. Any issue noted by our clients, Customer Service Representatives (CSRs), members of Interpreter Relations (IR) and Client Relations (CR) or interpreters, is taken seriously, and any error resulting in the delay or degradation of service will result in an Interpreter Report. In an effort to be consistent, IR finds it necessary for there to be a resolution process in place.

STEP ONE OF THE PROCESS:


All incidents are created by agents located in various departments within CTS and by providers. Once received, they are entered into a form on CTS Main.

Creating an incident:

1. CTS agent receives an incident, by phone, email, or feedback form the client.
2. IR receives the report via the Incident Dashboard in CTS Main.
3. IR has seven (7) business days to follow up with the information provided and you have seven (7) business days¹ to respond with written feedback once you receive the Interpreter Incident Form that will include the following information:
 - a. Description of the Incident
 - b. Level of Incident Severity
 - c. Type of Violation
4. Once feedback is received, any necessary follow up is done within (7) business days by Client Relations with the provider or other entity, regarding the validity of the incident report. ¹
5. IR then fills out the remainder of the fields on the Incident Form.
 - a. Description of Incident (Founded, Unfounded, or Undetermined)
 - b. Date of Resolution
 - c. Action Taken
6. Pending the investigation, which should take no longer than sixty (60) days, IR sends the final Interpreter Incident Form to the interpreter to review the complete report. This form is shown on page five (5).

¹ Unless extenuating circumstances apply.

INCIDENT REPORT DOCUMENTATION



INTERPRETER SERVICE REPORT

Interpreter's Name:	Today's date:
Client:	Date of Service:
Type of Service: <input type="checkbox"/> TELEPHONIC <input checked="" type="checkbox"/> ONSITE <input type="checkbox"/> VRI	Job ID:
LEVEL OF INCIDENT SEVERITY: <input type="checkbox"/> LOW <input type="checkbox"/> MEDIUM <input type="checkbox"/> HIGH	
DESCRIPTION OF INCIDENT: <input type="checkbox"/> FOUNDED <input type="checkbox"/> UNFOUNDED <input type="checkbox"/> UNDETERMINED	
TYPE OF VIOLATION	
Check all that apply:	
<input type="checkbox"/> Accuracy	<input type="checkbox"/> Impartiality-Conflict of Interest
<input type="checkbox"/> Disclosure	<input type="checkbox"/> Scope of Practice
<input type="checkbox"/> Professional Demeanor	<input type="checkbox"/> Professionalism & Customer Service
<input type="checkbox"/> Reporting Obstacles to Practice	<input type="checkbox"/> Self-Evaluation
<input type="checkbox"/> Professional Development	<input type="checkbox"/> Confidentiality (HIPAA)
<input type="checkbox"/> Compensation	<input type="checkbox"/> Non-Discrimination
<input type="checkbox"/> Cultural Sensitivity	<input type="checkbox"/> Health and Safety
INTERPRETER FEEDBACK	
DATE OF RESOLUTION:	
ACTION TAKEN:	
<p>HCA – Interpreter Relations CTS LanguageLink 911 Main Street, Ste 10 Vancouver, WA 98660 Fax 1.855.830.4590 Toll Free 1.888.510.3804, opt. 1 email: hcainterpreters@ctslanguageink.com website: www.hca.ctslanguageink.com</p>	

This form has been developed for use by CTS IR staff only, and is completed with information reported by the provider, client, and/or interpreter.

The IR department will utilize each section of the Code of Conduct² when reviewing a violation of policy resulting in an incident report.

² As signed by the Interpreter

Under the “Type of Violation” section, a check mark will be placed next to each violation noted in the incident report (there may be times where an incident report will include check marks in more than one violation box.) There is a “Description of Incident” for CTS to write details regarding the incident as it occurred with all applicable information. Included in this field are boxes for ‘Founded’, ‘Unfounded’, and ‘Undetermined’ which will indicate the validity of the claim. Should an investigation result in an ‘Unfounded’ decision the report will not be considered when taking action against an interpreter, unless a pattern is noticed. These boxes are not checked until all parties have been given the chance to provide feedback within the listed timeframes. The “Interpreter Feedback” section will allow the interpreter to comment or dispute the information provided as it relates to the incident. Failure to respond will result in CTS acting on the information given by Provider and internal CTS research. The “Action Taken” section will be for detailing the action taken for that related incident.

How we track these reports is very important as well. Each interpreter will be able to view all of their incidents that have resulted in an Unrated, Low, Medium or High Severity finding in their portal. The number of incidents per severity level is displayed at the top of the Incident List page. When an incident has reached its six (6) month lifespan, it will be removed from the Low or Medium counter on their portal and will only be accessible by setting the date range to the date of when the incident was created. Once an incident report has been placed in the archived folder, it will not be referenced in future actions taken, but is stored for record retention as mandated by state contract.

The below scale reflects the actions CTS will take at stated number of incident reports. Incidents will then be classified by their appropriate section and are accumulated based on their rank of severity. All incident reports will be sent to the interpreter by email as a notification but actions taken will only occur when the corresponding amount of incidents has accrued. As proposed, high severity incidents will not be limited to a time frame. Low and medium incidents would have an active lifespan of six months. All incident reports more than six months old will stay on file for review/consideration if it appears there is a pattern. If an interpreter has more than one action taken within the six-month timeframe it will result in the following:

INCIDENT SCALE TABLE:

INCIDENT SEVERITY: LOW	
NUMBER OF INCIDENTS	ACTION TAKEN
3 Low Severity Incidents	VERBAL
5 Low Severity Incidents	WRITTEN
7 Low Severity Incidents	PORTAL RESTRICTION (10 day min)
9 Low Severity Incidents	PORTAL RESTRICTION (20 day min w/warning notice)
11 Low Severity Incidents	PORTAL RESTRICTION (30 day min)
12 Low Severity Incidents	FULL PORTAL RESTRICTION (1 Week)
13 Low Severity Incidents	FULL PORTAL RESTRICTION (2 Weeks w/final warning notice)
14 Low Severity Incidents	TERMINATION OF CONTRACT

INCIDENT SCALE TABLE CONT'D:

INCIDENT SEVERITY: MEDIUM	
NUMBER OF INCIDENTS	ACTION TAKEN
1 Medium Severity Incident	VERBAL
2 Medium Severity Incidents	WRITTEN
3 Medium Severity Incidents	PORTAL RESTRICTION (10 day min)
4 Medium Severity Incidents	PORTAL RESTRICTION (20 day min w/warning notice)
5 Medium Severity Incidents	PORTAL RESTRICTION (30 day min)
6 Medium Severity Incidents	FULL PORTAL RESTRICTION (1 Week)
7 Medium Severity Incidents	FULL PORTAL RESTRICTION (2 Weeks w/final warning notice)
8 Medium Severity Incidents	TERMINATION OF CONTRACT

INCIDENT SEVERITY: HIGH	
NUMBER OF INCIDENTS	ACTION TAKEN
1 High Severity Incident	PORTAL RESTRICTION (10 day min)
2 High Severity Incidents	TERMINATION OF CONTRACT

IMPACT WITH MULTIPLE INCIDENTS:

Portal restriction will be a minimum of 10 calendar days to begin, but could extend to a full portal restriction. HCA will review all termination requests prior to the effective date for Interpreter. Reinstatement to the CTS or HCA contract is at the discretion of the Contractor and HCA.

In addition to the actions taken above, all incidents resulting in a portal restriction, full portal restriction, termination of contract and all High severity level violations will be sent to the appropriate certifying entity (such as DSHS for submission to the Language, Testing and Certification program for review). This report will include all information from the Provider and Interpreter.

When an interpreter receives a Portal Restriction for a minimum of ten (10) days up to termination of contract, depending on the findings of the incident, they will have their profile changed to show them jobs in their portal when an appointment reaches an emergency basis only. Interpreters requested under the criteria for medically necessary will be allowed to accept these appointments through their portal as well during the restriction period. Once an Interpreter reaches the “full portal restriction”, they will have no longer have access to accept any appointments until their restriction has ended.

High severity incidents reported are subject to immediate action up to and including Termination of Contract. Any violation to HIPAA or the Health and Safety of the patient, provider, and/or interpreter will be grounds for immediate Termination of Contract (permanent or temporary, pending an investigation lasting no more than four months). HCA will be notified immediately of the incidents and actions being taken by CTS. At the discretion of HCA and upon

resolution, a report of the incident will also be sent to the appropriate certifying entity.

INCIDENT IMPLEMENTATION

We believe it is imperative to all Interpreters that we provide you with as much information as possible in regards to the updated resolution process. With that being said, we will provide you with copies of this information via email, your Interpreter Portal and the Interpreter FAQ's.

On the day of release, when you login to your portal, you will see the following message, in which you will need to click the "I Agree" button to move forward:

Hello Interpreter,

Our Interpreter Relations (IR) department has updated our current Incident Resolution Process used to monitor Incident Reports. This updated process will continue to use the established customer service feedback form, which providers, clients and interpreters can use to report compliments and concerns. All concerns noted by our clients, Customer Service Representatives (CSR's), members of IR and Interpreters are taken seriously. Any error resulting in the delay or degradation of service will result in an interpreter Incident Report. This report, along with updated incident scales, will clearly define the consequences of violating the Interpreter Code of Conduct. Health Care Authority (HCA) and the Union have been consulted and provided feedback on this document.

This posting has been designed to give you a brief overview of the Incident Resolution Process so that you understand how this will impact your performance as an interpreter servicing the HCA contract. At the end of this notification, you will be required to click the "I Agree" button, acknowledging that you have read, understand and agree to the terms of this process.

The first part of this program is the creation of the Interpreter Incident Report. This is a report generated based on a complaint against an interpreter. In as much detail as possible, this will offer a description of the incident as it occurred. The form will also describe the level of severity of the incident, which part of the Code of Conduct has been identified as violated, as well as allows you to include any feedback you feel necessary for the report. At the end of the incident report, the action taken will be written (as it relates to level of severity).

A major part of this process will be your ability to monitor the amount of Incident Reports that have been reported. This will be extremely important, as there will now be consequences for having multiple violations. You will need to be familiar with how the consequence process works in relation to the amount of Incident Reports that you have. Below is a scale that depicts the number of incidents within a specified severity level and the action to be taken that correlates to that number. You will be able to see the number of incidents you have by severity level on a new tab in your portal labeled "Incidents".

*Please note that Unrated incidents have an active lifespan of one (1) month to six months and Low and Medium incidents are kept on record for a six-month timeframe. After which they will be removed from the overall count on your portal. Considering the nature of High Incidents, they will not be restricted to a specific timeframe and will accumulate over the life of your contract.

- Note: When receiving certain resolutions to this process, Interpreter feedback will be required.

If you receive an Incident Report with a resolution in the form of a Written, Portal Restriction or Termination of Contract, you will be required to give feedback. You will have seven (7) business days to include your feedback on the bottom portion of the Incident Service Report. If you fail to do so during this time period this incident will be recorded and added to your profile.

This process was developed to ensure consistency and that our clients are receiving the best customer service possible. For additional pertinent information on this process, please visit the [Interpreter FAQ's](#) on the HCA CTS website as a supplement to this posting. As stated earlier, you will need to click "I Agree" button affirming that you have read, understand and agree to the above process. You will not be able to move past this screen until you have done so.

In addition to this posting in your portal, during the same date and time the Interpreter FAQ's will be updated on the HCA/CTS website.

INTERPRETER PORTAL INCIDENT TAB

The last resource that you will be able to use to gain information about this process is within a tab labeled "Incidents" in your portal. This will allow you to monitor your personal incident reports. Once an incident has been marked by IR as Low, Medium, or High it would then be linked to your portal and reflected in the "Incidents" tab on the portal. It will be very important that you know where you stand in regards to the amount and severity of incidents you have at all times. Examples of how your portal looks:

CTS languagelink
We speak your customer's language

Interpreter Portal

Home My Login Status Call Performance Pending Jobs My Schedule Completed Jobs ▶ Paysheets Incidents ▶ Logout

Incident List

Below is a list of your Incidents. Select your criteria below and press the "Refresh" button. *NOTE: The screen automatically refreshes every 60 seconds.

My Incidents: Unrated: 1 Low: 1 Medium: 0 High: 0

Job Date between and Filter by Status Filter by Severity

All Open Incidents (not filtered by date).

Refresh Last refresh time: 9/18/2014 3:34:13 PM

	Incident	Severity	Status	Reported By	Job ID	Language	Job Date	Submitted	Resolution	Resolution Date
<input type="button" value="View"/>	1	Unrated	Closed	CTS	1234566	Spanish	05/15/2014	05/22/2014	None	5/27/2014 9:39:39 AM
<input type="button" value="View"/>	2	Low	Closed	CTS	1234567	Spanish	06/03/2014	06/11/2014	None	6/16/2014 9:07:23 AM

SUSPENSION

An Interpreter may be suspended immediately following the notification of a Safety or Health Violation, being charged or convicted of a felony, or a misdemeanor directly related to the performance of the interpreter's professional duties.

Time limited suspension will be given for instances resulting from violating federal or state rules such as the Health Insurance Portability and Accountability Act.

An investigation is performed and determination of the Interpreters status will be reviewed by CTS and HCA to reinstate or terminate contract.

INTERPRETER FEEDBACK FORM

This form is available to you through your Interpreter Portal. This form is provided so Interpreters can report situations they feel need to be addressed with CTS. Once the form is completed and submitted by you, you will be sent a confirmation. The IR department will then be notified of report. Depending on the information provided by Interpreter, further feedback may be requested. At this time, the IR department would fill out an incident report on CTS Main and follow current process.

WHISTLEBLOWER PROTECTION

In the case that an interpreter comes forward with credible information on violations to the Code of Conduct or Health and Safety of any parties involved, the reporting interpreter will remain anonymous.