

POLICY CATEGORY	OPERATIONS
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OP 03: Complaints regarding a CCCEP-Accredited Program

1. Purpose

CCCEP is committed to ensuring that all activities accredited by CCCEP and/or CCCEP's accredited providers adhere to the standards and guidelines for CCCEP accreditation. As such, complaints respecting a CCCEP accredited program are guided by this policy, which ensures that any complaints are acted upon appropriately and in a timely manner.

2. Scope of Policy

This policy applies to two types of complaints that may be made regarding CCCEP's accreditation of programs.

- 2.1 Type 1: A complaint from an individual or organization regarding CCCEP's accreditation of a continuing education program, the content or delivery of the program, or CCCEP standards, guidelines, policies and/or procedures.
- 2.2 Type 2: A complaint from an individual or organization against a CCCEP-accredited organization (accredited provider) providing continuing pharmacy education. The complaint must be related to the standards, guidelines, policies and/or procedures of CCCEP.

3. Submission of Complaints

- 3.1 All complaints must be detailed in writing to the Executive Director. Complaints may be submitted by mail or electronically.
- 3.2 The full name, address, telephone number, and e-mail information of the complainant should be provided.
- 3.3 Anonymous complaints will be retained and may be acted on in accordance with this policy. However, the actions taken may be limited if insufficient information is provided to fully investigate the complaint. A decision on whether a full investigation can occur will be made by the Executive Director.
- 3.4 Where legal action against the organization involved has been filed by a complainant, CCCEP may, having considered the nature of the complaint and the potential for a review to interfere with the legal investigation:

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3.4.1 Hold the complaint in abeyance pending resolution of the legal issues, and advise the complainant that this has been placed on hold and that no action will be taken until the complainant notifies CCCEP that the legal action has been concluded or terminated.

4. Management of Complaints

4.1 Normally, complaints shall be reviewed by the Executive Director. However, if the objectivity of the Executive Director may be compromised or the Executive Director is not available to handle the complaint, the President or Vice-President shall handle the complaint.

4.2 The Executive Director shall determine the nature and seriousness of the complaint, handle it in an appropriate and timely manner, and endeavor to resolve it through informal means prior to initiating a formal complaints process.

4.3 In all cases, the Executive Director shall inform the Board of the receipt of a complaint that falls within the scope of this policy within one week of receiving the complaint.

4.3.1 The report to the Board shall provide the name of the complainant, the type of complaint, the policy or program that is the subject of the complaint, a brief description of the complaint, the process being used to deal with the complaint, and any potential conflicts-of-interest that the Executive Director may have in handling the complaint.

4.3.2 The Executive Director shall provide regular, timely updates to the Board of Directors on the status of the complaint.

4.3.3 The Executive Director shall provide a report to the Board of Directors on the resolution of the complaint once it is concluded.

4.4 Where the Executive Director determines the complaint to be outside the scope of the policy, or where the nature of the complaint is deemed to be minor, then the Executive Director may conduct the investigation of the complaint.

4.4.1 Where the complaint is deemed to be outside the scope of the policy, the Executive Director will advise the complainant and dismiss the complaint while providing any relevant or appropriate guidance to the complainant that may assist them.

4.4.1.1 If the provider (where applicable) had been advised of the complaint prior to this determination then the provider shall be provided with notice that the complaint has been dismissed and the matter closed.

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- 4.4.2 Where the complaint is deemed within scope but minor in nature the Executive Director will seek to resolve the complaint through informal dialogue with the complaint and provider, as appropriate.
- 4.5 Even in the case of complaints deemed to be minor in nature, the Executive Director may establish a Complaints Committee composed of two or more members of the Board to review and make a decision on a complaint.
 - 4.5.1 Notwithstanding section 4.6, if the Executive Committee determines that a Complaints Committee should review the complaint, it may require its formation.
 - 4.5.2 Notwithstanding the above, in matters concerning an active accredited program where there is a potential egregious misinterpretation of data or a potentially harmful recommendation that may put patient safety at risk a Complaints Committee shall be formed to review the complaint.
 - 4.5.3 In complaints regarding the potential misstatement of data or a potentially serious recommendation, the accreditation of the program will be suspended by the Complaints Committee until the review is complete and the program provider will be asked to suspend the delivery of the program.
- 4.6 The Executive Director shall ensure that the information regarding the complaint is complete. When the information on a complaint is deemed complete, it shall be submitted to the organization affected for response.
- 4.7 The Executive Director shall promptly determine the facts surrounding the issue, determine the validity of the complaint, and resolve the issue in as timely a manner as possible. These decisions shall be based upon the complaint, the response from the organization, and information from any other investigation deemed necessary.
- 4.8 The timeframe for resolution is typically three months from the date that the complete information regarding the complaint is received.
 - 4.8.1 If circumstances require a longer period than noted above, the respondents shall be notified of the change of time period as soon as it is known.
- 4.9 A record of all complaints, including documentation as to the actions taken and the reports to the Board, shall be held on file at CCCEP for a minimum period of five years.

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5. Resolution of Complaints

5.1 Type 1 Complaints: CCCEP Accreditation, Content or Delivery, Standards, Guidelines, Policies and/or Procedures

5.1.1 There are three possible resolutions to a complaint:

5.1.1.1 *Mutually Agreeable Changes.* The program provider agrees to make changes to the program content or materials that address the concerns of the complainant;

5.1.1.2 *Accreditation is Revoked.* The accreditation is withdrawn as of a specified date. In this case the following applies:

5.1.1.2.1 There is no retroactivity with respect to CEUs awarded, meaning that CCCEP considers the statements of attendance issued prior to the revocation date to be valid.

5.1.1.2.2 CCCEP will notify the Provincial Regulatory Authorities that the accreditation has been revoked. This will include the reasons for the revocation.

5.1.1.2.3 The recognition of these CEUs by the provincial regulatory authorities is a decision of each regulatory authority. The program provider will be required to advise the program participants of the decision and keep CCCEP informed of the progress in notifying participants. The notice shall include the reasons for the revocation and the other appropriate information. CCCEP reserves the right to ensure that the process is appropriate and adequate.

5.1.1.2.4 The change in accreditation status shall be posted on the CCCEP website for a period of one year after the withdrawal of the accreditation.

5.1.1.3 *Complaint Dismissed.* The accreditation of the program remains in effect for the specified period.

5.1.2 The Executive Director, or Complaints Committee (if formed), has the authority to agree to mutually agreeable changes to the program (option 5.1.1.1) or deny a complaint (option 5.1.1.3). If the revocation of accreditation is deemed warranted, the Executive Director or Complaints Committee shall suspend accreditation and recommend the revocation of accreditation (option 5.1.1.2) to the Board of Directors.

5.1.3 If the complaint involves the Standards, Guidelines, policies or procedures for CCCEP Accreditation, the Executive Director or the Complaints Committee will review the complaint to determine if changes should be made to these documents or procedures. If changes are warranted, the Executive Director will make a recommendation to the Board regarding the changes.

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5.1.3.1 The Accreditation Policy Committee is to be consulted with respect to any changes resulting from the complaint that fall within their mandate.

5.1.4 If the accreditation of programs undergoing the complaints process (including appeal) is due for extension or renewal, the accreditation of the program may not be renewed, extended, or updated, except for temporary extensions, until the complaints process (including any appeal) is complete.

5.1.5 If the errors in the content of the program are of such a nature that their application may result in harm to patients or clients, the accreditation of the program may be suspended by mutual agreement until the conclusion of the complaint. In the event that there is no agreement to suspend the program, the Board of Directors may decide on the suspension of the program.

5.2 Type 2 Complaint: CCCEP Accredited Provider

5.2.1 Where the investigation of an external complaint has given rise to, or CCCEP itself has determined there is cause to believe that an accredited provider has accredited a program that does not align with CCCEP standards and guidelines or which has exceeded the authority of the accredited provider or otherwise is contrary to the accredited provider policy, it will investigate the matter and provide the organization an opportunity to respond to the allegations.

5.2.2 Records of prior complaints related to the accredited provider will be considered in addition to the results of the investigation, in determine appropriate action.

5.2.3 If, on the basis of the investigation, the Executive Director or Complaints Committee determines that a complaint does not fall within the scope of this policy the complainant is so advised in writing.

5.2.3.1 If the accredited provider had been notified of the complaint prior to the Executive Director determining it to be out of scope, then they shall be provided with a copy of the notice of the dismissal.

5.2.4 If, on the basis of such investigation, the Executive Director or Complaints Committee finds an accredited provider has accredited a program that is not in accordance with CCCEP's standards and guidelines, or whom has breached CCCEP's standards, guidelines or acted in a manner inconsistent with the Accredited Provider Policy, the Executive Director or the Complaints Committee will either:

5.2.4.1 Request that the accredited provider review the program and consider changing, suspending or withdrawing the program; or

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- 5.2.4.2 Make recommendations to the Board respecting the revocation of the program in question and/or of the status of the accredited provider.
- 5.2.5 If, per 5.2.4.1, the Executive Director or the Complaints Committee and the accredited provider cannot reach agreement on the resolution to a complaint, the Executive Director or Complaints Committee will make a recommendation on action to the Board of Directors.
- 5.2.6 If, on the basis of such investigation, the Executive Director or Complaints Committee feels that an accredited provider has acted in a manner that is not consistent with the standards or, guidelines of CCCEP, in a manner that is consistent with the Accredited Provider Policy, such that its actions seriously undermines CCCEP’s integrity, and the Executive Director or Complaints Committee intends to bring a recommendation to the Board in accordance with 5.2.4.2, then the Executive Director or Complaints Committee shall:
- 5.2.6.1 immediately discontinue its relationship with the accredited provider by withdrawing its accredited provider status.
- 5.2.7 The Executive Director, or Complaints Committee, is authorized to determine the resolution outlined in 5.2.4.1.
- 5.2.8 The Board of Directors will determine any resolution under 5.2.4.2.
- 5.2.9 The records of complaints may be considered during the regularly scheduled review of the organization’s accredited provider status, or a special review as required.

6. Right of Appeal

- 6.1 A complainant, a program provider, or an accredited provider, has the right to appeal a decision on a complaint if they are not satisfied with the resolution of a complaint. The appeal will be considered by the CCCEP Board of Directors.
- 6.2 A complainant a program provider, or an accredited provider who wishes to make an appeal shall submit a Notice of Appeal and supporting documents within 30 days of the party being informed of the decision on the complaint.
- 6.3 The appeal shall be addressed to the President and submitted via the CCCEP office. A copy of the appeal shall be sent to the Executive Director, or investigating officer. If a Complaints Committee had been formed, the Executive Director shall provide them with a copy of the appeal.

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- 6.4 The Board will review the Notice of Appeal and determine if it will consider the appeal.
- 6.5 If the Board determines that it will consider the appeal, an individual Director or Task Group will be appointed to review the original complaint and all documentation with respect to the action taken and the decision made as to the resolution.
- 6.6 The Director or Task Group will make a recommendation to the Board regarding the resolution of the appeal.
- 6.7 Members of the Board who sat on a Complaints committee formed for the purposes of the complaint that has been appealed are excluded from the discussions and decision of the Board respecting the appeal.
- 6.8 Members of the Board who sat on a complaint committee are excluded from the discussion of and decision on the complaint by the Board.
- 6.9 The decision of the Board of Directors is final, and no further appeals will be accepted.

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