



# **MHAI Recovery Network**

## **Non-Compliance Policy and Procedure**



**Recovery Network**

## MHAI Recovery Network Non-Compliance Policy and Procedure

### Table of Contents

|                                                                                                       |    |
|-------------------------------------------------------------------------------------------------------|----|
| <b>POLICY ONE: COMPLAINT PROCEDURES</b>                                                               | 2  |
| 1.1 <b>PROFESSIONAL COMPLAINTS</b>                                                                    | 2  |
| 1.2 <b>SELF REFERRAL</b>                                                                              | 2  |
| 1.3 <b>COMMUNITY COMPLAINTS</b>                                                                       | 3  |
| <b>POLICY TWO: INVESTIGATION &amp; DATA GATHERING</b>                                                 | 3  |
| 2.1 <b>CASE SCREENING</b>                                                                             | 3  |
| 2.2 <b>ABEYANCE</b>                                                                                   | 4  |
| 2.3 <b>INVESTIGATION: WRITTEN NOTIFICATION TO THE ACCREDITED PRO<br/>ORGANIZATION AND/OR EMPLOYEE</b> | 4  |
| 2.4 <b>COOPERATION</b>                                                                                | 5  |
| 2.5 <b>OTHER DATA GATHERING</b>                                                                       | 5  |
| <b>POLICY THREE: PROCESSING COMPLAINTS</b>                                                            | 6  |
| 3.1 <b>DEFINING ETHICAL VIOLATIONS</b>                                                                | 6  |
| 3.3 <b>CONSULTATION</b>                                                                               | 7  |
| 3.4 <b>DISPOSITION</b>                                                                                | 7  |
| <b>POLICY FOUR: DISCIPLINARY ACTIONS</b>                                                              | 10 |
| 4.1 <b>DISCIPLINARY ACTIONS</b>                                                                       | 10 |
| <b>POLICY FIVE: PROFESSIONALISM OF GRIEVANCE PROCEEDINGS</b>                                          | 12 |
| 5.1 <b>LEGAL REQUIREMENTS OF “GRIEVANCE PROCEEDINGS CONFIDENTIALITY”</b>                              | 12 |
| 5.2 <b>MHAI-RN “GRIEVANCE PROCEEDINGS CONFIDENTIALITY” GUIDELINES</b>                                 | 12 |
| 5.3 <b>PROFESSIONALISM AND CONFLICTS OF INTEREST</b>                                                  | 13 |
| 5.4 <b>COMMITTEE MEMBERSHIP</b>                                                                       | 13 |

## **POLICY ONE: COMPLAINT PROCEDURES**

### **1.1 PROFESSIONAL COMPLAINTS**

- a) Should a professional or professional organization wish to file a complaint, they shall be directed to submit the complaint via the MHAI Recovery Network (MHAI-RN) website using the online 'Grievance Submission' web submission form. This form will collect relevant information that may include the accused organization, specific program/project within the organization (if known/applicable), if the MHAI-RN PRO Accreditation status is known, date(s) of alleged incident, county of incident, and descriptions of alleged incident/concern. The person submitting the complaint will be provided with the option to submit their name and contact information as part of the complaint submission.
- b) Should translation services, or disability services, etc. be required to make a complaint, the MHAI-RN shall make a reasonable effort to accommodate these needs.
- c) Upon receipt, complaints shall be sent to the MHAI-RN PRO Grievance Committee once it is confirmed that the respondent/organization is under the jurisdiction of MHAI-RN. The original form submission notification will be sent to all MHAI-RN PRO Grievance Committee members for notification within 7 days of confirmation of MHAI-RN PRO jurisdiction of the respondent. Should the concern submitted be determined by the Grievance Committee to be the jurisdiction of the MHAI-RN, the respondent will be notified within 21 days of that validation. Jurisdiction is defined as the respondent holding a position in a MHAI-RN accredited PRO organization or program applying for accreditation or the organization where the complaint was filed against holding PRO accreditation or currently applying for PRO accreditation.

### **1.2 SELF REFERRAL**

- a) Should an MHAI-RN accredited PRO staff member or accredited PRO request to self-report a potential ethical violation, they shall be directed to submit the grievance via the MHAI-RN website using the online 'Grievance Submission' web submission form. No verbal or written submissions will be accepted.
- b) Should translation services, or disability services, etc. be required to make a complaint, the MHAI-RN shall make a reasonable effort to accommodate these needs.
- c) Upon receipt, complaints shall be sent to Grievance Committee once it is confirmed that the respondent/organization is under the jurisdiction of MHAI-RN. The original form submission notification will be sent to all Grievance Committee members for notification within 7 days of confirmation of MHAI-RN PRO jurisdiction of the respondent/organization. Should the concern submitted be determined by the Grievance Committee to be the jurisdiction of MHAI-RN, the respondent/organization

will be notified within 21 days of that validation. Jurisdiction is defined as the respondent holding a position in a MHAI-RN PRO accredited organization/organization applying for accreditation or currently applying for PRO accreditation.

### **1.3 COMMUNITY COMPLAINTS**

- a) Should a community member or MHAI-RN accredited PRO service recipient request to file a complaint, they shall be directed to submit the Grievance via the MHAI-RN website using the online 'Grievance Submission' web submission form. No verbal or written submissions will be accepted.
- b) Should translation services, or disability services, etc. be required to make the complaint, the MHAI-RN shall make a reasonable effort to accommodate these needs.
- c) Upon receipt, complaints shall be sent to the Grievance Committee once it is confirmed that the respondent is under the jurisdiction of MHAI-RN. The original form submission notification will be sent to all Grievance Committee members for notification within 7 days of confirmation of MHAI-RN PRO jurisdiction of the respondent. Should the concern submitted be determined by the Grievance Committee to be the jurisdiction of MHAI-RN, the respondent will be notified within 21 days of that validation. Jurisdiction is defined as the respondent holding a position in a MHAI-RN PRO accredited organization/organization applying for accreditation or the organization where the complaint was filed against holding PRO accreditation or currently applying for PRO accreditation

## **POLICY TWO: INVESTIGATION & DATA GATHERING**

### **2.1 CASE SCREENING**

- a) Cases shall be screened for referral to either the Grievance Committee, deemed not within the jurisdiction of MHAI-RN, or not an MHAI-RN PRO standards violation. Cases with little to no relevance to a particular accreditation standard (e.g. a complaint based upon personal preference), or those cases with little to no relevance to MHAI-RN PRO oversight (e.g. employee/employer disputes over wages/benefits), or cases that involve occupational activity regulated by other organizations shall not be handled by the Grievance Committee. These cases should be handled by the appropriate body who oversees those specific workforce issues and will not be considered within the jurisdiction of MHAI-RN. It is the duty of the Grievance Committee to make the determination of whether a case is the jurisdiction of MHAI-RN or not.

- b) In situations where the Grievance Committee deems cases to be referred to another agency, or not in the jurisdiction of MHAI-RN, MHAI-RN shall document an explanation for the rationale in the internal MHAI-RN grievance tracking document. The referral rationale may contain information related to:
1. occupational duties performed at the time(s) of the alleged violation(s)
  2. occupational duties being reimbursed at the time(s) of the alleged violation(s)
  3. lack of relevance to a particular MHAI-RN PRO accreditation standard
  4. lack of relevance to accredited PRO operations
  5. superseding board or authority at the time(s) of the alleged violation(s)
  6. lack of relevance to the MHAI-RN PRO accreditation and operations expectations
- c) Should a concern be filed anonymously, the Grievance Committee will determine whether the information provided in the concern provides enough information to investigate should an investigation be warranted based upon the nature of the concern. If there is not enough information and an investigation would require speaking to the complainant to investigate, MHAI-RN will not investigate.

## **2.2 ABEYANCE**

- a) Cases that are submitted to both the Grievance Committee and to other superseding agencies (EEOC, DWD, Indiana Department of Health, law enforcement, Department of Justice, The Division of Mental Health and Addiction, Indiana Professional Licensing Agency or other applicable oversight entities) can be held indefinitely in abeyance of other allied investigative findings.
- b) If MHAI-RN has been notified that a case has been submitted to another agency, cases will be held in abeyance of other allied investigative findings. MHAI-RN shall conduct periodic searches and notations reporting on either findings or the lack thereof, which shall be documented in the internal MHAI-RN ethics tracking document.
- c) Once findings from an allied agency have been issued, the case shall be referred to the Grievance Committee for their consideration.

## **2.3 INVESTIGATION: WRITTEN NOTIFICATION TO THE ACCREDITED PRO ORGANIZATION AND/OR EMPLOYEE**

a) Upon receipt of a grievance, notification of the complaint and the "nature of the complaint" will be e-mailed to the MHAI-RN accredited PRO or PRO applicant organization using the information found on file or through a public search for the business. The organization will be given a maximum of 30 days from date of notice to respond in writing to the MHAI-RN Grievance Committee. Responses will be included in all investigative reporting. MHAI-RN will notify the accredited PRO or applicant organization within 21 days of validation of MHAI-RN PRO accreditation jurisdiction of the matter by the Grievance Committee.

The investigator will review the accredited PRO or PRO applicants' response to the allegation(s) and decide regarding any need for additional information. To maintain the integrity of the data gathering process the Grievance Committee will use discretion in disclosing any information to all parties involved to elicit sound information that has not been altered or corrupted by over disclosure or fear of disclosure. Therefore, only the essential data will be presented to involved parties and, at least initially, names of complaining community members, peers, clients, etc. will be withheld to maintain the validity of the data gathering process.

b) Cases will be assigned to investigators or MHAI-RN staff to avoid conflicts of interest. Investigators will not accept cases where they have a conflict of interest. Investigators and staff will disclose immediately any perceived or identified conflict of interest. This includes, but is not limited to, current and prior relationships with the respondent (family, friendships, intimacies, business arrangements, etc.). Investigators shall be approved by the Grievance Committee prior to becoming investigators. The Grievance Committee shall determine the required qualifications for all grievance investigators. The investigators will meet role requirements as outlined by the Grievance Committee in investigator role description separate from this policy.

## **2.4 COOPERATION**

All accredited PRO organizations or programs have signed/dated a standards compliance document and agree to cooperate fully with the MHAI-RN Grievance Committee to maintain their accreditation or continue their accreditation application. Non-cooperation is grounds for revocation or revoking/pausing an accreditation application. MHAI-RN PRO accreditation holder or PRO accreditation applicant respondent of grievances must respond to complaints within 30 days of initial notification of a complaint being filed and must respond to requests for further information and materials within 15 days of each additional request. Responses may be submitted via e-mail or written response. The preferred method of response communication is e-mail.

## **2.5 OTHER DATA GATHERING**

- a) Should a case require additional data gathering beyond the information offered by the accredited PRO or PRO accreditation applicant and the original complaint(s), the committee shall approach other involved parties and elicit their observations. The Grievance Committee reserves the right to make its own determination of necessary data collection and will not solicit consent of the accredited PRO or PRO accreditation applicant or complaining party(ies). To maintain the integrity of the data gathering process the Grievance Committee will use discretion in disclosing any information to all parties involved to elicit sound information that has not been altered or corrupted by over disclosure or fear of disclosure. Therefore, only the essential data will be presented to involved parties and at least initially names of complaining community members, peers, clients, etc. will be withheld to maintain the validity of the data gathering process and protect complaining parties from retaliation (whistleblower protection).
- b) Other forms of data gathering may include, but are not limited to, reports of sanctions by other professional organizations, public records of criminal activity, social media post, investigations by the Indiana Professional Licensing Agency, Family Social Services Administration (FSSA), Commission on Accreditation of Rehabilitation Facilities (CARF), Joint Commission, etc.
- c) Should additional grievance(s) against the respondent be brought forth during the investigation, additional grievance(s) does not need to be filed. This additional concern will be provided to the Grievance Committee for potential action/in-action.

## **POLICY THREE: PROCESSING COMPLAINTS**

### **3.1 DEFINING ETHICAL VIOLATIONS**

- a) MHAI-RN staff, investigators, and the Grievance Committee will identify the relevant alleged violations and gather as much information as possible, and clarify whether the conflict is ethical, legal or moral or a combination of any or all these. The Grievance Committee will look at the defined alleged violations from many perspectives to avoid simplistic conclusions.
- b) The Grievance Committee will identify the potential violations involved pertinent to the applicable PRO accreditation standards and contemporary practice guidelines in behavioral health (e.g. practices promoted by SAMHSA, CSAT, NIDA, NIAAA, the National Institutes of Mental Health, and similar nationally recognized organizations). First and foremost, the Grievance Committee's primary focus shall

be on the health and safety of participant services. After the information is collected, the Grievance Committee will list and describe the critical issues and discard the irrelevant material unrelated to violations of the applicable PRO accreditation standards. The Grievance Committee will evaluate the rights, responsibilities and welfare of all of those who are affected by the situation and will accept the process of making ethical decisions by identifying competing principles, regulations, professional and cultural norms and practices.

### 3.3 CONSULTATION

The Grievance Committee may obtain consultation. The Grievance Committee may consult with an appropriate colleague or colleagues that may have special expertise in a particular issue to obtain additional perspective(s) on the alleged violation(s). Consultation can help us think about information or circumstances that we may have overlooked. The Grievance Committee will justify their course of action based on sound reasoning. Consultations with colleagues will provide the ethics committee with an opportunity to test the rationale of our recommended disposition of the case (as needed). All consultation will be done while maintaining confidentiality of the unresolved case and protecting the rights of all parties concerned. Consultation with associated fees greater than \$500 shall be approved by MHAI prior to conducting consultation. All external consultants will be required to sign a non-disclosure agreement prior to consultation being utilized.

### 3.4 DISPOSITION

a) The Grievance Committee will consider possible and probable courses of action. The Grievance Committee may consider different possibilities for action and their potential effects on the client, for others related to the client, agencies, and for the constituency of behavioral health professionals, community members or allied health professionals. The Grievance Committee will also review previous cases similar in nature to support consistency in decision making.

b) The Grievance Committee shall be empowered to vote on sanctions ranging from warnings, educational mandates, best practices mandates, practice restrictions, etc. This may include providing a suggestion for the complainant to file a complaint with the applicable governing body or filing a consumer complaint with the Indiana Office of Attorney General. The Grievance Committee will determine if suggestions are provided to the accuser to file a complaint with the appropriate agency or office. If the ethics committee determines the complaint should be filed with another agency or organization, that will be communicated to the accuser. The Grievance Committee shall refer all recommendations of suspension or revocation to the MHAI-RN leadership (Recovery Network Director and departmental leadership) for

final decision. The Grievance Committee shall operate in normal parliamentary procedures. The Grievance Committee shall make motions for findings, sanctions, and recommended suspensions and revocations. The motions and results of voting shall be recorded in the Grievance Committee meeting minutes. Suspension and/or revocation decisions shall be recorded as an addendum to the meeting minutes where the recommendation was made. The addendum will include relevant information such as who was involved in the decision making, date of discussion and reasoning for acceptance or denial of the recommendation from the Grievance Committee.

- c) In cases where the Grievance Committee is recommending a suspension or revocation, the Grievance Committee shall present its recommendations to the MHAI-RN leadership listed in 3.4 B. The MHAI-RN leadership reserves the right to accept the recommendation for suspension, deny the recommendation and request reconsideration by the Grievance Committee or request additional information.
- d) The Grievance Committee will make all reasonable efforts to resolve cases within 6 months. Should the decision require longer, the respondent will be notified.
- e) Written notice of the disposition of the case will be e-mailed and physically mailed to the PRO accreditation holder or PRO accreditation applicant. MHAI-RN will request written confirmation of receipt and send all physical mail via USPS certified mail option.
- f) All sanctions are public knowledge. Meeting minutes from the ethics committee meetings are not public knowledge. Unresolved, unfounded allegations or allegations held in abeyance are not public knowledge. Therefore, any individual may contact MHAI-RN to verify the current certification status of any individual. All findings, sanctions, suspensions and revocations may be posted to the MHAI-RN PRO Registry or other public notification deemed appropriate by MHAI-RN. This is done to support public safety related to services rendered.
- g) Appeal: All PRO accredited organizations or PRO accreditation applicants shall retain the right to appeal against the findings and sanctions imposed by the Grievance Committee and/or the MHAI-RN leadership team. Once a determination of findings has occurred by either the Grievance Committee and/or the MHAI-RN leadership team, the onus to reverse those findings is the responsibility of the PRO accredited organization or PRO accreditation applicant to present exculpatory data not previously considered by the Grievance Committee and/or the MHAI-RN leadership team. Perceived inequity of sanctions that have occurred over time, or perceived gravity of subsequent damages is not grounds for appeal. The appeal request must be submitted in writing within 20 days of the MHAI-RN grievance

decision notification letter.

1. If the respondent disagrees with the decision of the MHAI-RN PRO Grievance Committee, Respondent has 20 (twenty) calendar days from the date of the final decision letter to submit a written request for an appeal to the Recovery Network Director.
  2. The respondent can request a formal hearing from the Grievance Committee that includes the respondent presenting their case to the Grievance Committee. The Grievance Committee reserves the right to deny this request after consultation with MHAI-RN and departmental leadership.
  3. The Recovery Network Director will submit the request for an appeal and the file/record of the complaint to the Grievance Committee within 14 (fourteen) business days of receipt of the request.
  4. The Grievance Committee will review the complaint, investigation results and evidence, and the Grievance Committee decision. No new arguments, evidence, or testimony will be allowed.
- h.) The Grievance Committee will have 90 (ninety) calendar days from the day the PRO accredited organization or PRO accreditation applicant submitted the request for an appeal to review the file and issue a final written decision. The Grievance Committee may decide one of the following:
1. Uphold the findings and decision of the Grievance Committee
  2. Dismiss the complaint
  3. Return the complaint to an appeals committee that will be created specifically for this appeal.
  4. Grant an appeal hearing where additional findings, witnesses and similar can be presented by the PRO accredited organization or PRO accreditation applicant.
- i.) If the Grievance Committee upholds the original findings and decision or dismisses the complaint, the decision is final. There is no right to appeal against this decision. If the Grievance Committee returns the complaint to the ad hoc Grievance Committee for further action, then the Grievance Committee will follow the ad hoc Grievance Committee's directions, issue a new decision based on any new findings, and this new decision will be subject to appeal by the respondent.
1. Once a final decision has been made, the Recovery Network Director will enter the information into the database.
  2. Appeal investigations and hearings, should they be granted, will be conducted by a committee outside of the Grievance Committee and Recovery Network leadership team. Appeal committee members must meet the same eligibility requirements as Grievance Committee members. This

appeals committee will consist of a minimum of 3 members and no more than 7. The Recovery Network leadership team shall appoint the appeal committee members. The Recovery Network leadership team shall ensure that there are no potential conflicts of interest between the appeals committee member and the PRO accredited organization or PRO accreditation applicant and the complainant. All appeals committee members will have experience providing recovery support services through a community-based organization or program.

## **POLICY FOUR: DISCIPLINARY ACTIONS**

### **4.1 DISCIPLINARY ACTIONS**

- a) The Grievance Committee may choose from an array of official sanctions, such as, but not limited to:
  1. Recommendation: Occupational or Educational Advisory: a written statement warning the PRO accredited organization or PRO accreditation applicant of potentially unethical or illegal actions with recommendations to alter or cease practices in question, which will include educational advisement (as applicable).
  2. Educational/Supervisory Sanction: a mandated requirement to participate in an educational activity that is pertinent as a corrective action to an identified unethical practice. The mandated activity must be completed to retain accreditation in a reasonable amount of time that will be levied by the committee depending on availability of the education. Generally, educational mandates must be completed within 6 months or less as determined by the Grievance Committee. This level of sanction may include requirements related to supervision reports or other supervision documentation to support confirmation of consultation/guidance received related to the concern filed and how it has been approached/resolved with a supervisor.
  3. Suspension or Revocation: suspension of accreditation for an agreed upon time. MHAI-RN reserves the right to suspend and/or revoke an organization's PRO accreditation or PRO accreditation application based upon the nature of the accusation. All MHAI-RN PRO accreditation or accreditation applicant suspensions must be approved by MHAI-RN and departmental leadership. Accreditation application pauses can be determined by the Grievance Committee and do not require MHAI-RN leadership approval.
- b) The Grievance Committee may choose from an array of recommendations to the MHAI-RN leadership for cases where suspension, revocation or

permanent revocation are recommended.

1. Suspension: suspension of accreditation for a period, usually accompanied by mandated (education, adjustment/removal of services, etc.) requirements for re-instatement of eligibility. Suspensions will be mandated as determined by the MHAI-RN leadership team based upon recommendations from the Grievance Committee. Suspension occurs because of unethical practices, unresolved professional impairment, unresolved warnings or mandates, or non-cooperation, as determined by the Grievance Committee recommendations. Should accreditation expire during the dates of suspension, it is the responsibility of the accredited PRO to renew said accreditation upon reinstatement. Expiration dates do not pause due to an accreditation suspension. Reinstated accreditation renewals must meet current accreditation requirements.
2. Revocation: revocation of accreditation, where accreditation becomes null and void because of unethical practices, unresolved professional impairment, or unresolved warnings or mandates, as determined by the MHAI-RN leadership team. Upon revocation a PRO accredited organization or program or PRO accreditation applicant must wait a minimum of two-five years before re-applying for accreditation as determined by the MHAI-RN leadership team.
3. Permanent Revocation: permanent revocation of accreditation, where accreditation becomes null and void because of unethical practices, or unresolved warnings or mandates, as determined by MHAI-RN leadership. Upon permanent revocation a organization or program may not re-apply for accreditation with the MHAI-RN.

c) Accreditation Re-instatement:

1. Accreditation will not automatically be re-instated at the earliest possible re-instatement date. It is the duty of the suspended organization to petition MHAI-RN leadership to request re-instatement. This petition must be in writing and submitted to the Recovery Network Director who will provide it to the Grievance Committee.
2. The petition must include details related to education, professional mentorship, policy and procedure adjustments/implementation, and other requirements to support the request for re-instatement. Supporting documentation must be provided to confirm activities have been completed, such as attendance certificates, letters of recommendation, etc.
3. Accreditation re-instatements will be reviewed by the Grievance

Committee for consideration and re-instatement determination. Should the Grievance Committee feel they cannot reach a decision, they may refer the matter to the MHAI-RN leadership for review/decision. The MHAI-RN leadership will be notified of all accreditation reinstatements recommendations during the next scheduled Grievance Committee meeting or by electronic communication between committee meetings.

4. Submission of a petition to reinstate does not grant the automatic re-instatement of the accreditation. The Grievance Committee reserves the right to continue to uphold the suspension or request additional actions to be taken to rectify the behaviors that led to the suspension.
5. Accreditation re-instatement shall be for the remainder of the accreditation's validity. Should accreditation expire during the suspension, the accreditation must be renewed based upon current renewal standards.

## **POLICY FIVE: PROFESSIONALISM OF GRIEVANCE PROCEEDINGS**

### **5.1 LEGAL REQUIREMENTS OF "GRIEVANCE PROCEEDINGS CONFIDENTIALITY"**

- a) The MHAI-RN will make every reasonable effort to maintain confidentiality in all investigative procedures. The MHAI-RN is not responsible for information shared by anyone, not directly associated with the MHAI-RN. This includes MHAI-RN staff, the Grievance Committee, and/or investigators. There is not a legal obligation of confidentiality for the MHAI-RN per any Indiana law.
- b) There exists no overt or implied statement of confidentiality of Grievance Proceedings in the MHAI-RN PRO Accreditation Agreement.

### **5.2 MHAI-RN "GRIEVANCE PROCEEDINGS CONFIDENTIALITY" GUIDELINES**

- a) The following general guidelines of "professional confidentiality" are recommended to the Grievance Committee, however, as previously stated, are not required under law. The Grievance Committee will decide appropriate "grievance proceedings confidentiality" on a case per case basis.
- b) General Guidelines
  1. Unresolved and/or unfounded allegations are not public knowledge and will not be maintained in an organization's accreditation file. They

will be maintained in an MHAI-RN internal ethics tracking documentation. Unresolved and/or unfounded allegations will not be reported upon request, unless requested through an accepted subpoena or court order. The Recovery Network reserves the right to file to quash.

2. Sanctions are public knowledge and can be reported upon request.
3. Written copies of specific communications, records or audio tapes pertaining to the case will not be disseminated to the public unless otherwise requested by an accepted subpoena or court order.
4. Grievance Committee members and MHAI-RN staff shall not discuss grievance proceedings outside of the committee membership or professional consultation.
5. A written statement of sanctions & current accreditation status may be posted to the accreditation registry, or other areas deemed appropriate by the MHAI-RN team.

### **5.3 PROFESSIONALISM AND CONFLICTS OF INTEREST**

- a) The MHAI-RN and departmental leadership team must vote to suspend, revoke, or permanently revoke an organization's accreditation based upon the Grievance Committee's recommendation. If a committee member is aware of a conflict of interest, they shall abstain from discussion, motions, or voting.
- b) Any member of the Grievance Committee who is aware of a conflict of interest between themselves, the PRO accredited organization or program or PRO accreditation applicants in question or complaining party(ies) must abstain from grievance proceedings for that case.

### **5.4 COMMITTEE MEMBERSHIP**

The Grievance Committee consists of a Grievance Committee Chairperson and no less than two other members, with a maximum of seven members, who are appointed by the MHAI-RN leadership team. The Recovery Network Director shall staff the committee. The Grievance Committee Chair must be a member of leadership at a currently accredited PRO organization or program. The remaining members can be PRO accredited organizations or program staff members or other health care professionals who are not staff members of PRO accredited organizations or programs.