

 Policies and Procedures	Policy	Document #: INS.7.1.003 Revision: 1 Approval Date: 22/May/2022 Page 1 of 4 Effective Date: 22/May/2022
Review of Inspector Performance		

1.0 Purpose

The purpose of this document is to define FACT’s policy for management of active inspector performance.

2.0 Scope

This policy applies to FACT active and trainee inspectors, volunteers, and FACT staff.

3.0 Responsibility

- 3.1 The FACT Quality Manager and FACT Inspector Development Committee liaison are responsible for for the administration, implementation, and maintenance of this policy.

4.0 References

- 4.1 [Hearsay Evidence](#), LGL.4.1.001
- 4.2 [Reviewing Complaints and Grievances](#), LGL.4.6.001
- 4.3 [Inspector Status](#), INS.7.1.002
- 4.4 [Inspector Training Program](#), INS.7.1.004
- 4.5 Documenting and Facilitating the FACT Inspector Training Program, INS.7.6.002

5.0 Definitions and Abbreviations – N/A

6.0 Policy

- 6.1 FACT inspectors are volunteer experts in the field who are expected to maintain their professional credentials and conscientiously perform objective inspections of applicant facilities in a timely, professional, unbiased, and confidential manner according to FACT policies and procedures.
- 6.2 Specific inspector requirements are listed in the [Inspector Status](#), [Inspector Training Program](#), and *Documenting and Facilitating the FACT Inspector Training Program*.
- 6.3 The FACT Inspector Development Committee has oversight of training and education requirements and opportunities for FACT inspectors and of inspector performance (both collectively and individually).
- 6.4 The FACT Inspector Development Committee regularly reviews feedback regarding inspector performance during inspections. Such feedback may be received from other inspectors, the applicant facility personnel, FACT coordinators, or other sources.

- 6.4.1 The FACT Quality Manager and Inspector Development Committee liaison are responsible for review of evaluations from all inspections and for the preparation of data for the Inspector Development Committee.
- 6.4.2 Trends of aggregate data are identified and necessary improvements will be made to the FACT education and training program. Data includes, but are not limited to, the number of inspection evaluations received, sources of evaluations (e.g., applicants, inspectors, trainees), and number of evaluations that include complaints, compliments, suggestions, or other comments.
- 6.4.3 Inspectors who are the subject of specific, positive evaluations will receive a letter of acknowledgement from FACT on behalf of the FACT Inspector Development Committee and Chair.
- 6.4.4 Management of unfavorable comments is described below.
- 6.5 FACT may receive adverse inspector information in a variety of ways, including, but not limited to evaluations, in-person communication, telephone discussion, email, or inspection audit results.
- 6.6 Upon receipt of any adverse information, the initial recipient at the FACT Office forwards the information to the FACT Quality Manager and the FACT Inspector Development Committee liaison.
- 6.7 The name of the inspector remains confidential with the exception of the Chair of the Inspector Development Committee and FACT personnel.
- 6.8 The FACT Inspector Development Committee liaison assesses the information and determines what (if any) further investigation is necessary. The liaison may consult with the FACT Chief Medical Officer (CMO) or Chief Executive Officer if necessary.
 - 6.8.1 The inspector may not be scheduled for any new inspections during this process if the initial determination suggests the incident warrants action.
 - 6.8.2 The extent of further investigation depends upon many factors, including but not limited to:
 - 6.8.2.1 Severity of the complaint.
 - 6.8.2.2 Prior complaints related to the same individual.
 - 6.8.2.3 Experience of the inspector, including frequency of inspections performed.
 - 6.8.2.4 Extenuating circumstances (such as high profile complaint, public dissemination of complaint).
 - 6.8.2.5 Any other relevant factors.
- 6.9 The FACT Inspector Development Committee liaison compiles additional data related to the performance issue and the specific inspection. This information may include but is not limited to:
 - 6.9.1 Source documents.

- 6.9.2 Inspection reports.
- 6.9.3 Inspection evaluations.
- 6.9.4 Coordinator assessments.
- 6.9.5 Prior information about the inspector (for example, experience, number of prior inspections, and number of previous complaints of which she/he was the subject).
- 6.9.6 Previous information about the complainant (length of time the program has been accredited, previous complaints, etc.).
- 6.10 Complaints deemed to have little or no merit or lack significance are filed, the issues are closed, and the inspector may continue to perform inspections.
- 6.11 Complaints unrelated to performance as a FACT inspector (such as issues in the press or at the inspector's home institution) are handled on a case-by-case basis by the CMO, FACT Inspector Development Committee liaison, FACT Quality Manager, FACT legal counsel, or others as appropriate. Refer to [*Hearsay Evidence*](#) or [*Reviewing Complaints and Grievances*](#).
- 6.12 Complaints related to inspector performance in relation to FACT business, including the results of the investigation to date, are forwarded by the FACT Inspector Development Committee liaison to the Chair of the FACT Inspector Development Committee.
- 6.13 The Chair of the Inspector Development Committee may request additional information.
- 6.14 The Chair of the Inspector Development Committee contacts the inspector to identify additional factors relevant to the complaint and follow up with the FACT Inspector Development Committee liaison to determine what (if any) remedial or corrective action is required. The FACT CMO is informed as this process progresses.
- 6.15 If it is determined that the complaint lacks merit, the complaint is closed and filed, and the inspector is notified that the complaint has been closed.
- 6.16 If it is determined that the inspector in some manner did not fulfill her/his responsibilities in the conduct of the inspection process, remedial action may be required depending in part upon severity, number of prior occurrences, and other factors. Potential remedial actions include but are not limited to:
 - 6.16.1 Email acknowledgement of the issue and further guidance.
 - 6.16.2 Telephone discussion of the issue and further guidance.
 - 6.16.3 Additional reading, review of standards, or an exam on standards.
 - 6.16.4 Participation in an additional training workshop or trainee inspection.
 - 6.16.5 Disqualification of inspector from further inspections for a specified or unspecified period of time.
- 6.17 The Chair of the Inspector Development Committee or the FACT Inspector Development Committee liaison coordinates completion of the required corrective and preventive actions with

the inspector, the timeline for completion, and the repercussions of failure to complete these requirements and to demonstrate improvement.

6.18 Upon completion of the corrective and preventive actions, the inspector may resume inspections.

6.19 If the inspector does not show improvement or is the subject of additional performance complaints, the Chair of the Inspector Development Committee and CMO determine the appropriate action(s) to follow, based on the number and severity of performance issues, up to removal of the individual from the FACT inspectorate.

6.19.1 Inspectors with repeated unsatisfactory performance reports may not be assigned additional inspection responsibilities.

6.20 At any time, a volunteer inspector may appeal the decisions made by the FACT Inspector Development Committee liaison, the Chair of the Inspector Development Committee, or the Inspector Development Committee.

6.20.1 The first appeal is sent to the FACT CMO. If the issues cannot be resolved at this level, the FACT CMO forwards the issue to the Grievance Committee.

Approved by (date):

Heather Conway (Quality Manager) (22/May/2022), Linda Miller (Chief Operating Officer) (21/May/2022), Phyllis Warkentin (Chief Medical Officer) (21/May/2022)