

Name	Grievances
Relevant Policy	Complaints, Reporting, Record Keeping
Applicable to	Same
Location	Policy and Procedures Manual
Effective Date	2/1/2008
Date(s) of Revision	10/1/2012; 8/1/2016; 2/6/2020
Legal and other References	96.41 (a)

### **Complaint/Grievance Policies and Procedures (Hague Regulation 96.41(a))**

Alliance for Children aims to provide high quality services. If there are any concerns about programs or services, we ask that families contact this office to discuss them. It is our hope and intention to resolve any problems that may come up.

AFC permits any birth parent, prospective adoptive parent, adoptive parent, or adoptee (each a “complainant”) to lodge a complaint or appeal about any services or activities of AFC and/or its collaborative providers that such person believes are inconsistent with the Hague Convention, Intercountry Adoption Act of 2000, Hague Regulations, the Universal Accreditation Act of 2013, State, Federal, or Country laws, rules, or regulations, or standard adoption policy and practice, and advises them of the procedures that are available to them if they are dissatisfied with the agency’s response. No staff member will take any action to discourage a birth parent, prospective adoptive parent, or adoptive parent from making a complaint, expressing a grievance, questioning the conduct of, or expressing an opinion about the performance of any AFC staff member. AFC will not retaliate against any person who files a complaint or provides information to a licensing authority, the accrediting entity, or the Department of State.

AFC does not discourage anyone from filing a complaint or a grievance. AFC believes that gaining a better understanding of difficulties individuals and families face may serve a dual purpose: 1) it helps agency staff to appreciate the position of a client/consumer, thereby developing a greater understanding of the stresses and frustrations that sometimes accompany an adoption process and creating a deeper level of insight and compassion; and 2) brings problem areas into greater focus and allows for problem-solving efforts to address them. While a conflict between two parties is sometimes difficult, the resolution creates an opportunity for growth.

The agency ensures that no one is discouraged from or is penalized for filing a complaint by 1) proactively fostering an agency culture in which raising concerns is valued 2) providing multiple ways to file a complaint 3) monitoring of a complainant’s process by a member of the management team after a complaint has been filed to ensure that their process proceeds in exactly the same way as anyone who has not filed a complaint 4) providing corrective or disciplinary action should evidence be found of someone being penalized for having filed a complaint 5) welcoming feedback at any time so that minor issues might be rectified before they become formal complaints.

AFC’s Complaint Procedures include:

1. AFC's administrative staff provide a copy of the Complaint (Grievance) Policies and Procedures to prospective adoptive parent(s) at the time they sign a service agreement. A copy of the complaint procedure is also posted on the Agency's website.
2. Any complaint should be made by submitting a written description of the basis for Complaint to the Executive Director. If the Complaint is related to the Executive Director, the written description of the basis of the Complaint should be made to the Board of Directors. The Management Team Staff will immediately investigate the facts of the complaint and respond to each complaint in writing within 30 days. This investigation will include:
  - a. Written acknowledgement that a complaint has been received
  - b. An individual interview with each party, client and staff member
  - c. A thorough review of the file, including all documents, paperwork and case notes
  - d. A joint meeting with all parties present, either in person or via conference call/video conference
  - e. A written response, notifying the complainant of our findings and any actions the agency has taken in regards to the complaint
  - f. If applicable, changes are made to agency practices to address gaps or imperfections in delivery of services
3. If the complaint is time sensitive or involves allegations of fraud, the investigation will be expedited and will be completed within 72 hours.
4. The matter will be heard by the Executive Director and a staff member who has not been directly involved in the case, in order to assure a fair and impartial hearing. If the Executive Director is involved in the complaint, the matter will be heard by two members of the Board of Directors instead.
5. A written decision shall be rendered within 30 days of the hearing and will be sent to the complainants, along with a copy of the written appeal process, in their native language.
6. If the complainant is not satisfied with the results of the hearing, an appeal may be initiated. The appeal request must be submitted in writing, stating the grounds for the appeal, and must be submitted within 21 days following the decision.
7. An appeal date must take place within 28 days of receiving the request for an appeal. One member of the Board of Directors and two staff members who have not worked directly with the complainant(s) or two members of the Board of Directors will hear the appeal.
8. A written decision regarding the appeal will be rendered within 21 days and will be sent to the complainant(s) in their native language.
9. A complaint may be filed with state licensing authorities and accrediting entities at any time.
10. If necessary, the Executive Director will solicit the services of an independent, impartial person or entity to investigate the complaint.

11. The Director of Administrative Services & Quality Control maintains a written record of each complaint. This written record also details the steps involved in investigating and responding to it. The complaint, as well as all steps taken to remedy and/or address the allegations and concerns, are available to the agency's state licensing authorities and the entity/organization assigned to accredit the agency.
12. To the extent that AFC agrees to take certain action(s) to resolve a complaint, agency staff and board, led by the Executive Director and the President of the Board of Directors must take such actions within 30 days of agreeing to the plan.
13. If a complainant is dissatisfied with the response to the complaint, the complainant may appeal the decision by writing to President of the Board of Directors.
14. The Board of Directors responds to the complaint within 15 days.
15. The Director of Administrative Services & Quality Control will report its complaint data to the accrediting entity on a semi-annual basis; the accrediting entity may request to review complaint records at any time. AFC will provide to its Hague accrediting entity and the Secretary of State on a semi-annual basis the following:
  - a. A summary of all complaints received
  - b. An assessment of any discernible patterns in complaints received against AFC along with information about the systematic changes that were made or are planned to be made.
16. The agency utilizes the complaint data as part of an overall Quality Improvement Program which includes:
  - a. Review of complaint data: the Management Team reviews all written complaints; The Board of Directors is notified when a complaint is filed, identifies any possible trends, gaps or flaws in services, makes changes to policy and suggests procedural improvements, if needed
  - b. Annual quality improvement audit: the Management Team and the Board of Directors receives an annual review of quality indicators, such as time frames, numbers of adoptions, numbers of withdrawals, complaints received and concerns expressed; this is done as a proactive measure to identify potential future issues with service delivery
  - c. Satisfaction Survey: the agency sends out satisfaction surveys at the completion of a home study and at the completion of agency services; the results are reviewed and discussed, as appropriate, at staff meetings; recommendations for new policies or policy updates are made to the Board of Directors
  - d. Review of State Licensing Reports: the Management Team reviews the findings of state licensing reports and corrective actions are developed and implemented
  - e. Websites, listeservs, collaborative providers: the Management Team periodically reviews policies, procedures, trends and information from other sources and websites in order to monitor and update best practices and approaches in the field of adoption.

- f. comparing AFC's practices and performance against the data contained in the Secretary's annual reports to Congress.

17. In the case of a complaint regarding domestic adoption or US-based services, AFC will work with any relevant local, state, or federal authorities to resolve any issue that may come up. Clients, prospective clients, and former clients will utilize the Notice of Complaint Procedure outlined above.

18. Complaints may be filed with the following:

- Department of State Hague Complaint Registry:  
[http://adoption.state.gov/hague\\_convention/agency\\_accreditation/complaints.php](http://adoption.state.gov/hague_convention/agency_accreditation/complaints.php)
- Accrediting Entity: IAAME: <https://www.iaame.net/report-a-concern/>
- Arkansas: <https://humanservices.arkansas.gov/about-dhs/dms/passe-ombudsman>
- Connecticut: <https://portal.ct.gov/DCF/OCR/Home>
- Florida: <https://portal.ct.gov/DCF/OCR/Home>
- Massachusetts: <http://www.mass.gov/eohhs/gov/departments/dcf/dcf-ombudsman.html>
- New Jersey: <https://www.nj.gov/dcf/about/divisions/oa/>
- New York: [http://ocfs.ny.gov/main/regionaloffices\\_main.asp](http://ocfs.ny.gov/main/regionaloffices_main.asp)
- Pennsylvania: <https://www.dhs.pa.gov/Services/Assistance/Pages/Regional-OCYF-Offices.aspx>
- Rhode Island: <http://www.child-advocate.ri.gov/index.php>
- Texas: [https://www.dfps.state.tx.us/Contact\\_Us/Questions\\_and\\_Complaints/OCR.asp](https://www.dfps.state.tx.us/Contact_Us/Questions_and_Complaints/OCR.asp)