## Complaint Policy and Procedure

**Introduction:** New Beginnings (NB) aims to provide the highest quality service. As part of the commitment, NB wants to ensure that all clients can express concerns with the agency or its supervised providers without fear of retaliation. A Client is a birth parent, prospective adoptive parent, adoptive parent, or adoptee who has received or is currently receiving services from NB, including services done by a supervised provider. For most issues, we can work together to find a positive resolution. This policy intends to provide clients with a means to communicate concerns to the agency and resolve them satisfactorily and promptly.

Can it be Resolved: If a Client has a complaint, grievance, or question concerning NB, let us know. We prefer to resolve such issues promptly through normal channels of communication. Discuss it with the Director of Social Services or the appropriate Program Director. NB will look to resolve the issue promptly so it does not become a lingering problem. If the Complaint is not easily or quickly resolved, the Committee will open a Complaint Report to maintain all correspondence regarding the Complaint, investigation, and response. We will seek a resolution in thirty (30) days.

Will Not Discourage or Retaliate: The NB and its staff will never take action to discourage a Client from, nor retaliate against a Client for making a complaint, expressing a grievance, providing information in writing, or interviews to the Department of State or an accrediting entity on agency's performance, or questioning the conduct of or expressing an opinion about agency's performance.

**Formal Complaint:** NB offers the above steps as part of our complaint process; however, a Client may submit a Formal complaint to NB to initiate the process or at any time. The <u>Formal Complaint is filed with NB</u>. It must:

- Raise an issue of compliance with the Convention, the IAA, the UAA, or the regulations implementing the IAA or UAA. The
  Client does not need to identify the issue in the Complaint. NB submits <u>all Formal complaints</u> to IAAME and the Secretary for
  review. IAAME or the Secretary will make that determination.
- Be about services done by NB or a foreign or domestic supervised provider.
- Be signed and dated, and provide the circumstance of the Complaint with specific examples. (Signature includes e-signatures.)

The Adoption Committee reviews <u>all Formal complaints</u>. (The Adoption Committee is composed of NB's senior management). Once received, the Committee assigns a member as the point of contact. If not previously done, the point of contact will open a Complaint Report.

All Formal Complaints: NB informs the accrediting entity and the Secretary of <u>all Formal complaints</u> over the preceding six months, regardless of the resolution. The Complaint Report provides all correspondence regarding the Complaint and investigation. The Report includes the resolution and an assessment of any discernible patterns in complaints received. If NB makes or plans systemic changes in response to a complaint pattern, we include this in the Complaint Report. Upon request, NB will make the Complaint Report and any other documents available to the accrediting entity and the Secretary.

**Timelines:** Within five (5) business days of receiving the Formal Complaint, the point of contact will confirm receipt. Within thirty (30) days of receiving the Formal Complaint, the Adoption Committee will take necessary and reasonable steps to investigate the Complaint, including interviews with the Client, staff, or supervised providers. The Committee will respond in writing with a proposed solution or determination. NB provides an expedited review of any complaints that are time sensitive or involve allegations of fraud.

The 30-day response includes:

- A summary of the facts and circumstances.
- Any specific finding of the investigation.
- When possible, actions NB will take to resolve or mitigate the issue.
- Procedures to follow if the Client is dissatisfied with the response.

If the Client does not respond, the point person will contact the Client to confirm receipt and understanding of NB's 30-day response. If the Complaint is resolved, NB enters the resolution in the Complaint Report and prepares the submission to the accrediting entity and the Secretary. If the Client is unsatisfied, they may file the Complaint directly to the accrediting entity and the Secretary (contact information below).

Further Review In the alternative, the Client may request a further review. The request must:

- Be written or emailed.
- Include the objection and desired resolution.
- Submit within twenty (20) days of receiving NB's response to the Formal Complaint.

NB's Adoption Committee, and when appropriate, members of the Board of Directors or outside experts, will:

- Confirm receipt of the request.
- Review the request and the Complaint Report.
- Conduct a further investigation as needed.
- Respond in writing within twenty (20) days.

If, after further review, NB's decision has not changed to where an agreed resolution is reached, the Client is informed they may submit the Complaint to the accrediting entity and the Secretary.

**Direct Contact Information:** If after submitting a Formal complaint and completing the process above without a satisfactory resolution, a client may file directly with the US Department of State's "Hague Complaint Registry" or at Adoption. State.gov; the accrediting entity, IAAME; and our State's licensing authorities (contact information is on the last page of the Adoption Service Agreement.)

**Quality Improvement.** Upon receiving a Formal complaint, NB looks to improve its process to prevent a similar complaint in the future. NB looks for any discernable pattern as part of its quality improvement practices. In assessing complaint patterns, we will review client satisfaction surveys that raise the same or similar issues. When appropriate, NB compares its practices and performance against the data contained in the <a href="Secretary">Secretary</a>'s annual reports to Congress and other published reports. In response to a complaint pattern, NB will make or consider systemic changes to improve its services.