



CLIENT COMPLAINT PROCEDURE

I. AGENCY POLICY

Any birth parent, prospective adoptive parent or adoptive parent, or adoptee (“clients”) may on occasion have a complaint, grievance, or question concerning Holt services or staff. When such complaints or questions arise, they should be promptly discussed with the appropriate staff and quickly resolved so that they do not become lingering problems. If a complaint or question is not resolved to the client’s satisfaction, the following procedure offers the opportunity for a more thorough consideration of the issues.

II. PRINCIPLES

The client complaint procedure is to be administered according to the following principles:

- Every complaint or problem is significant enough to be of concern.
- Every problem should be resolved as quickly and as close to the source as possible.
- Clients are encouraged to use the Complaint Procedure without fear of retaliation or adverse action on the part of Holt.

III. COMPLAINTS NOT RELATED TO THE HAGUE CONVENTION, the IAA, the UAA or HAGUE REGULATIONS

Oral, in-person complaints are the preferred method for resolving client issues not related to the Convention, the IAA, the UAA or Hague regulations. It is often most efficient and expeditious to resolve a complaint in person by bringing the matter to the attention of the Holt worker responsible.

- Clients should feel free to make an oral complaint to any Holt worker or employee. If the complaint is not related to the worker’s job duties, he or she will refer the matter to the appropriate department.
- An oral complaint received by a Holt assistant as part of day-to-day operations may be resolved by the assistant when possible. Or, if the assistant feels it appropriate, or if the client requests, the assistant may refer the complaint to the relevant Holt Director.
- An oral complaint received by a Holt Director and related to services provided by Holt will be resolved by the Director whenever possible. In cases where the complaint is related specifically to Holt policy, the resolution will be discussed with the Senior Executive of Intercountry Adoption or the Senior Executive of US Programs.

Illinois residents:

- Within two (2) business days of receipt of a written complaint by Holt’s Branch Director related to services provided by Holt, an investigation will be initiated.
- Resolution of complaints will be reported to the Illinois Department of Children and Family Services (DCFS) licensing representative within 10 business days after the complaint is received unless extenuating circumstances require additional time for resolution.
- Holt will maintain written documentation of all complaints received.
- Resolutions of all complaints will be reported to the agency board of directors at its next meeting following the resolution of the complaint.
- If the complaint pertains to or raises an issue of compliance with State statutes and regulations, any person dissatisfied with Holt’s resolution of the complaint may contact DCFS Advocacy Office for Children and Families (800-232-3798).

IV. COMPLAINTS RELATED TO THE HAGUE CONVENTION, IAA, UAA or HAGUE REGULATIONS

A. Requirements for Complaints

1. A complaint:
 - can be made by email or letter
 - states with specificity the nature of the complaint, including any relevant dates and the names of persons involved
2. Submission of complaints: The complaint must be directed to the Senior Executive of Intercountry Adoption or the Senior Executive of US Programs.

B. Response

1. The Senior Executive of Intercountry Adoption or the Senior Executive of US Programs will:
 - Provide an email acknowledgement of the complaint to the client within 5 business days of receipt of the complaint.
 - Review the complaint with the appropriate Adoption Director for further investigation and response.
2. The Senior Executive of Intercountry Adoption or the Senior Executive of US Programs:
 - May, at his or her sole discretion, arrange an interview with the complainant, and may take any other steps to investigate the complaint.
 - Will respond in writing to the complainant within thirty working days of receipt of the complaint. However, when a complaint involves time-sensitive matters or allegations of fraud, the Senior Executive of Intercountry Adoption or the Senior Executive of US Programs will provide expedited review of the complaint, within 5 days of complaint.
3. The written response shall contain:
 - A summary of the facts and issues
 - Specific findings regarding the issues
 - A summary of the procedure to be followed if the complainant is dissatisfied with the response and wishes further review of the decision.
4. The written response shall be sent to the client and to the Vice President or Senior Vice President of that region.

C. Further Review

1. If the complainant is not satisfied with the response of the Senior Executive of Intercountry Adoption or the Senior Executive of US Programs, the client may request further review. The request for review must:
 - Be written or emailed.
 - Be submitted within 20 working days of receipt of the Holt response to the initial complaint.
 - Specify the nature of the objections to the decision or conclusions contained in the initial Holt response.
2. The Vice President or Senior Vice President of the region, in conjunction with the CEO, will:
 - Review the matter and consider all relevant and available facts and circumstances.
 - Respond in writing within thirty working days of the date of Holt's receipt of the request for review.
3. The decision made by the Vice President or Senior Vice President of the region and the CEO is final.

D. Written Complaints to Third Parties

If the complaint concerns or raises an issue of compliance with the Hague Convention or the U.S. implementing statutes and Convention, any person dissatisfied with Holt's resolution of the complaint, or if the complaint was not responded to within 30 days, the complainant may file a complaint with the Hague Convention Complaint Registry.

Contact information and procedures for the Hague Convention Complaint Registry may be obtained as follows:

Hague Convention Complaint Registry
http://adoption.state.gov/hague_convention/agency_accreditation/complaints.php
(888) 407-4747
Attn: U.S. Central Authority
U.S. Department of State Bureau of Consular Affairs
Office of Children's Issues, Adoption Unit (SA-29)
2201 C Street, NW
Washington, DC 20520

V. REPORTING AND RECORD-KEEPING

1. If a staff member receives a written (email or letter) complaint related to Hague regulations, the IAA, the UAA or Hague Convention they will provide the complaint to the Senior Executive of Intercountry Adoption or the Senior Executive of US Programs for follow up.
2. The Senior Executive of Intercountry Adoption or the Senior Executive of US Programs, or his/her designee, will maintain a record of each written complaint made pursuant to this procedure. The written record will detail the steps taken to investigate and respond to the complaint. The record of complaints will be retained in a central file or database.
3. The record of Client complaints will be reviewed quarterly by the Continuous Quality Improvement Committee. The CQI Committee will track and evaluate the complaints in order to:
 - Identify consistent themes, trends, or discernable patterns and make recommendations that may improve practices and services to constituents.
 - Determine if a complaint raises an issue of compliance with Hague regulations, the IAA, the IAA or Hague Convention.
4. A detailed report of these complaints will be provided to the Holt CEO and Senior Executive of Intercountry Adoption on a semi-annual basis.
5. Holt will submit semi-annual reports regarding these complaints to the accrediting entity and to the Hague Secretary. The reports will include the following:
 - A summary of all complaints received by Holt during the preceding six months related to lack of compliance with Hague regulations, the IAA, the UAA or The Hague Convention. The summary will provide information about total complaints received and about how each complaint was resolved.
 - An assessment or evaluation as to whether the complaints display or reveal any discernible pattern or problem at Holt.
 - If a discernable pattern or problem is apparent, a summary of any systematic or remedial steps made or contemplated by Holt in response to the pattern or problem.

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