

United Labor Agency Counseling Center
Policies & Procedures



Title: Complaints and Grievances		
Chapter:1 – Quality Business Standards	Section: 5 – Continuous Quality Improvement	Number: 1.5.02
Effective Date: 6/1/24	Revision Date(s):10.24.24	
Approved By: Alicia Boreman, LPCC-S		
Applies To: ALL		
Rule/Accreditation Reference: CARF; OAC 5122-26-18		

Purpose:

The purpose of this policy is to establish guidelines for addressing and resolving complaints and grievances from clients, employees, volunteers, and other stakeholders of the United Labor Agency Counseling Center (ULACC)

Policy:

ULACC is committed to providing high-quality services and maintaining open lines of communication with clients, employees, and other stakeholders. We recognize the importance of addressing complaints and grievances promptly, fairly, and confidentially to promote client satisfaction, employee morale, and organizational improvement. ULACC prohibits retaliation and/or barriers to services as a result of complaints/grievances being reported.

Procedure:

Formal Complaint – A written or verbal expression of dissatisfaction or concern made by an individual. Although formal complaints may be reported through established channels, resolutions may be more easily identified or remedied typically at a program or supervisory level.

Grievance – A formal complaint that has been escalated beyond the initial point of contact leading to investigation by the Client Rights Officer. Grievances follow structured documentation processes for resolutions and may include investigation, mediation, etc., to rectify the situation and prevent similar issues in the future.

Complainant – Individual filing a complaint and/or grievance

Complaints & Grievances:

1. Rights & Responsibilities

- a. Right of freedom of reporting without concern: ULACC prohibits retaliation or barriers to services against individuals who raise complaints or grievances in good faith and will take appropriate measures to protect whistleblowers from adverse actions or reprisals.
- b. Right to access to written complaint procedures and/or forms readily available and communicated in a manner that is understandable
- c. Right to be informed of the written procedure, investigation and resolutions
- d. Right to timely communication and decisions
- e. ULACC has the right to follow these written procedures
- f. Responsibility: ULACC personnel (including Client Rights Officer)
 - i. Ensure that all appropriate processes are followed in accordance with this policy/procedure regarding Complaints and/or Grievances
 - ii. Respond in a timely manner in accordance with this policy/procedure
 - iii. Provide open and ongoing communication with complainant
- g. Responsibility: Clients
 - i. Provide details associated with complaint/grievance to ensure thorough investigation
 - ii. Request a formal meeting, in writing, when applicable

- h. Any individual may request assistance from the Clients Rights Officer (aka Client Advocate) in filing a complaint or grievance (information about the Clients Rights Officer's name, title, location, hours of availability and telephone number is listed in the Clients Rights postings in all ULACC offices)
2. Support
 - a. At any point during the process the complainant may request the involvement of an outside advocate, support person or other assistance
3. Communication
 - a. ULACC will communicate with the complainant throughout the investigation and resolution process to provide updates, solicit feedback, and address any concerns or questions.
 - b. Timely and transparent communication will be maintained to keep the complainant informed of progress and outcomes.
 - i. In instances where a resolution to the grievance may take longer than 20 business days the Client Rights Officer will provide notification to the complainant.
4. Confidentiality
 - a. Confidentiality will be maintained throughout the complaint resolution process to protect the privacy and confidentiality of the complainant, individuals involved, and sensitive information disclosed.
5. Follow-Up
 - a. Following the resolution of a complaint or grievance, ULACC will conduct follow-up actions as necessary to ensure that corrective measures are implemented, lessons learned are applied, and feedback is solicited to prevent similar issues from recurring.
6. Escalation
 - a. If a complaint cannot be resolved satisfactorily at the initial level, it may be escalated to higher levels of management or to an independent reviewer, as appropriate.
 - b. Escalated complaints will be handled to ensure fair and impartial review and resolution.
7. Reporting and Analysis
 - a. Complaints and grievances will be documented, tracked, and analyzed on an ongoing basis to identify trends, patterns, and systemic issues that may require ULACC's attention and improvement.
8. Non-Retaliation
 - a. ULACC prohibits retaliation or barriers to services against individuals who raise complaints or grievances in good faith and will take appropriate measures to protect whistleblowers from adverse actions or reprisals.
9. Implementation
 - a. The Client Rights Officer will be responsible for implementing this policy and ensuring adherence to the complaint handling procedures outlined herein.

Formal Complaint Procedure

Reporting

- May be reported verbally or in writing to any personnel supervisor, manager or the Client Rights Officer.
 - Any complaints disclosed to personnel, will be directed to one of the above individuals.
 - Once the appropriate personnel have been notified of a formal complaint, they will reach out to the complainant within 3 business days to discuss further.

Acknowledgment and Documentation

- Upon receipt of a complaint, the organization will acknowledge receipt (receipt may be verbal or written) and document the details of the complaint, including the nature of the issue, the identity of the complainant (if known), and any relevant supporting information.

- Written acknowledgement of the complaint will be provided within 3 business days of receipt.
Investigation and Resolution

Investigation and Resolution

- Throughout the investigation and resolution process, information will be collected in a person-centered, empathetic manner ensuring alignment with ULACC's Mission and Core Commitments
- Complaints will be promptly investigated by designated personnel to gather relevant facts, identify underlying causes, and determine appropriate courses of action.
- Individuals associated with the immediate process of a complaint may include direct service personnel, supervisors/managers, and/or the Client Rights Officer
- Some investigations may require multiple levels of review including, but not limited to:
 - Supervisory Review (Clinical)
 - Administrative/Compliance Review (Client Rights Officer)
 - Legal Review (external review such as Legal counsel)
 - Depending on the nature and complexity of the complaint, resolution may involve mediation, conflict resolution techniques, policy clarification, corrective action, or other remedial measures.
 - In some circumstances, Complaints may be escalated to Grievances which will be discussed with the client at which point this becomes a transition.
- ULACC strives to investigate and provide written resolution to all complaints within 10 business days of the complaint being reported. (In instances where this process may require more time, the complainant will be notified.)
- Documentation records of complaints will be maintained for at least 2 years from resolution.

Grievance Procedure

Reporting

- May be initially reported verbally or in writing to any personnel supervisor, manager or the Client Rights Officer.
 - Any grievances disclosed to personnel, will be directed to one of the above individuals.
- Once a grievance has been identified, the Clients Rights Officer will be notified and will reach out to the complainant within 3 business days to discuss further,
- A written description of the grievance must be completed. If the client is unable to prepare a written description of the grievance, the Clients Rights Officer will develop this with them. All grievances must:
 - Be dated and signed by the client, the individual filing the grievance on behalf of the client or have an attestation by the Clients Rights Officer that the written grievance is a true and accurate representation of the client's grievance.
 - Include the date, approximate time, description of the incident and names of individuals involved in the incident or situation being grieved.

Acknowledgment and Documentation

- Upon receipt of a grievance, the organization will acknowledge receipt and document the details of the complaint, including the nature of the issue, the identity of the complainant (if known), and any relevant supporting information.
 - Written acknowledgement of the grievance will be provided within 3 business days of receipt by the Client's Rights Officer. This will include:
 - Notifying the client that a resolution decision will be made within 20 business days of receipt of the grievance. Any extenuating circumstances indicating that this time period will need to be extended must be documented in the grievance file and written notification given to the client.
 - Date the grievance was received

- Summary of grievance
- Overview of grievance investigation process
- Timetable for completion of investigation and notification of resolution
- Treatment provider contact name, address and phone number

Investigation and Resolution

- Throughout the investigation and resolution process, information will be collected in a person-centered, empathetic manner ensuring alignment with ULACC's Mission and Vision
- Grievances will be promptly investigated by designated personnel to gather relevant facts, identify underlying causes, and determine appropriate courses of action. The Client Rights Officer will designate the immediate individual who may be involved in the investigation process
 - Individuals associated with the immediate process of a grievance may include direct service personnel, supervisors/managers, and/or the Client Rights Officer
- Some investigations may require multiple levels of review including, but not limited to:
 - Supervisory Review (Clinical)
 - Administrative/Compliance Review (Client Rights Officer)
 - Legal Review (external review such as Legal counsel)
- Depending on the nature and complexity of the grievance, resolution may involve mediation, conflict resolution techniques, policy clarification, corrective action, or other remedial measures.
- ULACC strives to investigate and provide written resolution to all grievances within 20 business days of the complaint being reported. (Any extenuating circumstances that may impact this time period requiring an extension, will be documented in the grievance file and written notification will be provided to the client.)
- If at any point, the complainant is dissatisfied with the proposed resolution, they may request a formal meeting in writing to discuss further and/or reach out to an outside entity for further investigation or resolution to their grievance.
 - In these instances, the client will be provided with a copy of the Client Grievances Procedure which includes the organizations, mailing address and telephone number for each (information provided below)
 - Applicable Board of Alcohol, Drug Addiction and Mental Health Services
 - Ohio Department of Mental Health and Addiction Services
 - Disability Rights Ohio
 - U.S. Department of Health and Human Services, Civil Rights Regional office in Chicago
- Documentation of grievances will be maintained for at least 2 years from resolutions, records of client grievances that include, at minimum the following:
 - Copy of the grievance
 - Documentation reflecting process used and resolution/remedy of the grievance
 - Documentation, if applicable of extenuating circumstances for extending the time period for resolving the grievance beyond twenty business days.

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ULACC Client Rights Officer:
Alicia Boreman, LPCC-S
Clinical Director
737 Bolivar Rd Suite 300
Cleveland, OH 44115
Office Hours: By Appointment
***Available virtually Monday – Friday, 8am – 7pm**
(216) 815-1821
Alicia.boreman@ulagency.org

<p><u>ADAMHS Board of Cuyahoga County</u> 2012 W. 25th St Cleveland, OH 44113 (216) 241-3400</p>	<p><u>U.S. Department of Health & Human Services</u> Office for Civil Rights 233 N. Michigan Avenue, Suite 240 Chicago, Illinois 60601 (312)886-2359</p>
<p><u>Ohio Department of Mental Health and Addiction Services</u> 30 East Broad Street, 8th Floor Columbus, Ohio 43215 (614)466-2596</p>	<p><u>Disability Rights Ohio</u> 200 Civic Center Drive Suite 300 Columbus, OH 43215 (614)466-7264</p>
<p>You may contact one of the two below agencies regarding your Complaint or Grievance; however, they may choose to redirect you to one of the applicable agencies listed above.</p>	
<p><u>Attorney General’s Office Medicaid Fraud Control Section</u> 30 East Broad Street, 17th Floor Columbus, Ohio 43215 (614)466-4320</p>	<p><u>Commission on Accreditation of Rehabilitation Facilities</u> Phone (520) 325-1044 Toll Free: (888) 281-6531 https://carf.org/contact-us/</p>
<p>For Complaints or Grievances against individual clinicians (not ULACC as an organization), you may choose to contact one of the below boards, as applicable.</p>	
<p><u>Counselor, Social Worker and Marriage and Family Therapist Board</u> 77 S. High Street, 24th Floor, Rm 2468 Columbus, Ohio 43215 (614)466-0912</p>	<p><u>State of Ohio Medical Board</u> 77 S. High Street, 17th Floor Columbus, Ohio 43215 (614)466-3934</p>
<p><u>State of Ohio Board of Nursing</u> 17 S. High Street, Suite 400 Columbus, Ohio 43215 (614)466-3947</p>	<p><u>State of Ohio Board of Psychology</u> 77 S. High Street, Suite 1830 Columbus, Ohio 43215 (614)466-8808</p>