

ATTACHMENT B

FAMILYCORE COMPLAINT POLICY AND PROCEDURE FOR INTERCOUNTRY ADOPTIONS

FamilyCore Complaint Policy

This complaint policy and procedure document regarding intercountry adoptions is provided to prospective adoptive parents prior to any services being provided and prior to application for FamilyCore services. FamilyCore recognizes that, at times, differences of opinion or disagreements will occur between adoption staff and agency adoptive parents, prospective adoptive parents, and adoptees. Every client of FamilyCore has the right to make a complaint using this outlined procedure. In accordance with CFR 96.41, the agency permits any birth parent, prospective adoptive parent or adoptive parent, or adoptee to lodge directly with the agency (including its use of primary providers) signed and dated complaints about any of the services or activities of the agency or person that he or she believes raise an issue of compliance with the Convention, the IAA, the UAA, or the regulations implementing the IAA or UAA, and advises such individuals of the additional procedures available to them if they are dissatisfied with the agency's or person's response to their complaint.

FamilyCore will treat all individuals who state a complaint with respect and dignity. FamilyCore will not take any action to discourage a client or prospective client for making a complaint, providing information in writing or interviews to an accrediting entity on the agency's performance, or questioning the conduct of or expressing an opinion about the agency's performance. FamilyCore will not retaliate against a client or prospective client for making a complaint and will not interfere with an official review. The agency or person responds in writing to complaints within thirty days of receipt and provides expedited review of such complaints that are time-sensitive or that involve allegations of fraud.

FamilyCore Complaint Procedure

The purpose of this procedure is to set forth principles and guidelines for the timely resolution of client concerns, complaints and grievances, and to protect the rights of clients using FamilyCore services in connection with an intercountry adoption. This Complaint Policy and Procedure document may be supplemented with additional specific recommendations regarding the submission of a complaint or grievance to FamilyCore, none of which recommendations shall conflict with the principles and procedures set out in this document.

(a) FamilyCore has adopted this written complaint procedure for use in intercountry adoptions in accord with its written policy regarding complaints and grievances. A copy of this policy and these procedures, including contact information for the Complaint Registry (created pursuant to 22 CFR 96.70), is provided to the prospective adoptive parent(s) no later than the time the Adoption Services Contract is signed.

(b) FamilyCore permits any birth parent, prospective adoptive parent or adoptive parent, or adoptee to lodge directly with FamilyCore signed and dated complaints about any of the services or activities of FamilyCore (including its use of supervised providers) that he or she believes raise an issue of compliance with "Intercountry Adoption Accreditation and Maintenance Entity" (IAAME), with the "Convention on the Protection of Children and Co-operation in Respect to Intercountry Adoptions (Hague, 1993)", the "Intercountry Adoption Act of 2000, the "Intercountry Adoption Universal Accreditation Act of 2012", or the regulations implementing these agreements, and advises such individuals of the additional procedures available to them if they are dissatisfied with FamilyCore's response to their complaint.

(d) FamilyCore maintains a written record of each complaint received pursuant to this complaint procedure, and of the steps taken to investigate and respond to any such complaint, and FamilyCore makes this record available, on request, to any of the accrediting agencies described in this procedure, or to the Secretary of State, or to any other entity that has been designated by the Secretary of State to accredit agencies that provide adoption services in the United States in intercountry adoption cases including, if applicable, the Assistant Secretary of State for Consular Affairs, or any other Department of State official exercising the Secretary of State's authority under the agreements and regulations described above).

(e) FamilyCore does not take any action to discourage a client or prospective client from, or retaliate against a client or prospective client for: making a complaint; expressing a grievance; providing information in writing or interviews to an accrediting entity (as described in this procedure) on FamilyCore's performance; or questioning the conduct of or expressing an opinion about the performance of FamilyCore.

(f) FamilyCore provides to the accrediting entity (as described in this procedure and the Secretary of State (or designee), on a semi-annual basis, a summary of all complaints received pursuant to this FamilyCore complaint procedure during the preceding six months (including the number of complaints received and how each complaint was resolved) and an assessment of any discernible patterns in complaints received against FamilyCore pursuant to this complaint procedure, along with information about what systemic changes, if any, were made or are planned by FamilyCore in response to such patterns.

(g) Complaint Process:

- i. What is a Complaint? A complaint is a formal, written grievance about any particular issue thought to be unfair, offensive or in violation of the FamilyCore Clients Rights policies, Illinois Department of Children and Families Adoptive Parent Rights and Responsibilities, the Hague Convention on Intercountry Adoption, the Intercountry Adoption Act (“IAA”), and the Universal Accreditation Act (“UAA”). While it is expected that open, direct communications will resolve most concerns, it is the general policy of FamilyCore that all complaints be taken seriously and that attempts to resolve every complaint are done promptly.
- ii. A formal complaint may be filed by putting the matter into writing, signing and dating the written complaint, and submitting it to the Counseling & Adoptions Director. FamilyCore will provide to the family a “*FamilyCore International Adoption Program Complaint Form*” upon request or the family may put the matter into writing using their own preferred method.
- iii. The complaint must state the date and with specificity the nature of the complaint, including names of the persons involved, and be signed and dated by the complainant. Complaints may be filed in-person or mail at FamilyCore at 330 S.W. Washington St., Peoria, Illinois 616202, or email at adoption@familycore.org. Complaints that the prospective adoptive parent(s), adoptive parent(s), or adoptee(s) feel have not yet been resolved may be filed directly to the U.S. Central Authority/U.S Department of State through the Hague Complaint Registry. The steps to complete to file through the Hague Complaint Registry are as follows:

Filing an Electronic Complaint with the Department of State:

1. Visit the Department of State’s Hague Complaint Registry:
<https://travel.state.gov/content/travel/en/Intercountry-Adoption/about-adoption-service-providers/hague-complaint-registry.html>
2. Select the blue button with the bell icon that states “Enter Complaint Registry”
3. Carefully follow the Department’s instructions on submitting the electronic complaint.

4. Fill out all necessary information

How to File a Complaint with the Department of State Via Mail or Fax

1. Follow the same directions for electronic filling as stated above and print out the Complaint form.
2. Submit either by mail or fax to the following:

U.S. Central Authority
U.S. Department of State
Bureau of Consular Affairs
Office of Children's Issues, Adoption Unit
SA-17, Floor 09
Washington, D.C. 20522-1709

You may also request a form by calling (888) 407-4747

- iv. The Counseling & Adoption Department Director will respond to complaints in writing within 30 days of receipt of the complaint. If the complaint is time-sensitive or involves allegations of fraud, the Counseling & Adoption Department Director will expedite her/his response.

(h) FamilyCore has a quality improvement program appropriate to its size and circumstances through which it makes systematic efforts to improve its adoption services as needed. FamilyCore uses quality improvement methods such as reviewing complaint data, using client satisfaction surveys, or comparing FamilyCore's practices and performance against the data contained in the Secretary's annual reports to Congress on intercountry adoptions. The Adoption Specialists disclose within its Quality Improvement meetings on a monthly basis any complaints received within the international adoption program. This will be documented in the Quality Improvement minutes.

(i) Procedures and Timetable for Complaint Records Maintenance and Disclosure: FamilyCore provides any information about complaints received pursuant to this procedure as may be requested by the accrediting entity (as described in this procedure) or the Secretary of State, or the Secretary's designee.

- i. A written record of all complaints, appeals, and the steps taken by the agency to investigate and respond to those complaints will be maintained by the agency. This information will be made readily available to the accrediting entity or the Secretary upon request. Complaints filed with FamilyCore will be compiled by the Adoption Specialist who is assigned to that case. A copy of the complaint will be submitted to the Department Director and the Chief Executive Officer. The Adoption Specialist will also enter this information into the "*FamilyCore Complaints and Appeals Record for International Adoption.*" The record will be updated as the case progresses and/or is resolved. Every six months, the record will be electronically archived and a new record for the next cycle will be implemented. All written records, including signed complaint forms, will be compiled and maintained together in a secure manner. They will be securely housed in locked filing cabinets in the adoption specialist's office. All written records will be archived annually and placed in locked filing cabinets with closed adoption records, organized by date.
- ii. The adoption specialist, Department Director, and CEO will review the written complaint records, the "*FamilyCore Complaints and Appeals Record for International Adoption,*" and any supplemental documentation on a quarterly basis for any complaints or appeals filed with the agency within the past

six months. The purpose of this review is to assess any discernible patterns in complaints against the agency, or any appeals, along with an outlined plan for systemic changes made or planned after identifying patterns impacting the Agency's quality of provision of services. Such assessment will include evaluating the type of complaint and circumstances surrounding the complaint, as well as any supplemental documentation provided by the complainant(s).

- iii. The Adoption Specialists shall provide a written summary of all complaints received to the accrediting entity and the Secretary of State on a semi-annual basis or as requested. The FamilyCore Chief Executive Officer will also provide this summary report on a semi-annual basis to the Board of Directors. If the agency received complaints within the past six months, an Adoption Specialist will submit a report in essay format. This report shall include the number of complaints received during that period of six months, the resolution of the complaints, any discernible patterns in complaints, and any changes that were made by the FamilyCore or that FamilyCore plans to make in response to problematic patterns. This report will compile applicable information gathered from Quality Improvement meetings, a summary of the "*FamilyCore Complaints and Appeals Record for International Adoption*," and quarterly meetings held amongst Adoption Specialists, Chief Executive Officer and the Department Director. This report will be attached to the Semi-Annual Report on Complaints ("SARC"), which is submitted by the adoption specialist to the accrediting body within 10 days of April 1 and October 1 each year. The SARC will be submitted to the Secretary on the same date it is sent to the accrediting body by the adoption specialist.