

## COMPLAINT POLICY AND PROCEDURES

### **Policy**

Spence-Chapin permits Birth Parents, Prospective Adoptive Parents, Adoptive Parents, and Adoptees to lodge directly with Spence-Chapin signed and dated complaints about any of the services or activities of the agency that the complainant believes raise an issue of compliance with the Convention, the IAA, the UAA or the implementing regulations and advises complainants of additional complaint procedures available to them.

### **Procedure**

Creating a family through adoption can be a complicated and challenging experience. It is also a process that can be costly and often subject to delays outside the control of Spence-Chapin or our clients. At Spence-Chapin Services to Families and Children ('Spence-Chapin'), we understand how difficult this process is and we do our utmost to prepare and support our clients at all stages of the adoption process. Our greatest responsibility, however, is to protect the best interest of children.

In doing so, sometimes Spence-Chapin must make decisions with which our clients do not agree. Although it is not always possible for staff to accommodate or concur with the wishes of clients, all clients are entitled to clear explanations of the policies and procedures used by the agency as well as specific decisions made within the programs. We are committed to providing clients with a supportive environment where questions, complaints, and concerns can be aired and problems resolved whenever possible.

As per 22 CFR 96.41 (a) Spence-Chapin maintains complaint policies and procedures that incorporate the standards in 22 CFR 96.41 (b-h). Complaint procedures, including contact information for the Complaint Registry are as follows:

### **Filing a Complaint with Spence-Chapin**

Spence-Chapin 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 on the Spence-Chapin's performance; or questioning the conduct of or expressing an opinion about the performance of Spence-Chapin. Spence-Chapin encourages honest feedback as it provides an opportunity for Spence-Chapin to continuously improve its services.

Spence-Chapin permits and encourages any birth parent, prospective adoptive parent or adoptive parent, or adoptee to submit directly to the agency signed and dated complaints, including complaints about any of the services or activities of the agency (including its use of domestic and foreign supervised providers and exempt providers) 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. The complainant may submit the complaint directly to the staff he/she has concerns with, a supervisor, or a department director. Complaints may be submitted in writing via mail, email, or

in-person.

Once notified in writing, Spence-Chapin will initiate an investigation of the complaint within two business days and the appropriate department director will reply to the complainants grievance in writing within 10 business days (or sooner if the issue is time-sensitive or involves allegation(s) of fraud).

If the complainant finds that their concerns are not resolved through this process or they are otherwise dissatisfied with Spence-Chapin's response to their complaint, the complainant is instructed to send a signed and dated letter to the agency's Chief Executive Officer. The CEO will either respond directly or will appoint a senior staff member to investigate the complaint and recommend a resolution within ten days in writing (or sooner if the issue is time-sensitive or involves allegation(s) of fraud.)

### **Complaints to External Accrediting or Licensing Bodies**

Complainants also always have the right to complaint directly to external accrediting and oversight bodies if the complainant believes Spence-Chapin is in violation of the Hague Convention, the IAA, the UAA, or any of the implementing regulations.

Complainants may make a report to the Complaint Registry, which was established by the US Department of State to receive and maintain records of complaints about accredited agencies providing adoption services, available at the following web link:

<https://travel.state.gov/content/travel/en/Intercountry-Adoption/about-adoption-service-providers/hague-complaint-registry.html>

For assistance with submitting the appropriate complaint forms via mail or fax, complainants can contact the Office of Children's Issues at [Adoption@state.gov](mailto:Adoption@state.gov) or (888) 407-4747.

Additionally, as a Hague Accredited agency, complaints against Spence-Chapin may be directed verbally, in writing or electronically to the Intercountry Adoption Accreditation and Maintenance Entity (IAAME), the entity that accredits and monitors Spence-Chapin. Complaints can be submitted to IAAME at this web link: <https://www.iaame.net/report-a-concern>.

Spence-Chapin is licensed to provide adoption services in the states of New York and New Jersey. General complaints about Spence-Chapin's operating procedures and policies and its compliance with state laws and regulations can be submitted to state agencies following the protocol listed below:

To make a confidential complaint about the operations of an agency providing domestic or international adoption for NEW YORK residents, contact:

The Office of Children and Family Services  
52 Washington Street, Room 323 North  
Rensselaer, NY 12144  
Phone: 518-474-9406

Please be advised that a request may be made for a fair hearing with respect to the Agency's decision on a specific matter by submitting your request, in writing, within sixty (60) days from the date of the Agency's determination to:

The Office of Children and Family Services  
52 Washington Street, Room 332 North  
Rensselaer, NY 12144  
Phone: 518-474-9406

To make a confidential complaint about an agency providing domestic or international adoption for NEW JERSEY residents, contact:

State of New Jersey  
Department of Children and Families  
Office of Licensing  
P.O. Box 717  
Trenton, NJ 08625  
1-877-667-9845

Complaints can be made by phone or in writing and sent to the address above. Cases that cannot be immediately resolved will be investigated. New Jersey residents may also contact the not-for-profit Foster and Adoptive Services agency at 800-222-0047. This organization advocates for the rights of clients in the adoption and foster care systems.

Spence-Chapin is approved to place children in the state of Connecticut. For information on how to submit complaints to the Office of the Ombudsman please call:  
(Local: 860-550-6301, Toll-Free: 1-866-637-4737).

### **Additional Complaint Policies & Procedures**

Spence-Chapin maintains a written record of each complaint received and the steps taken to investigate and respond to it and makes this record available to the accrediting entity or the Secretary upon request.

Spence-Chapin provides, on a semi-annual basis, to the accrediting entity and the Secretary a summary of all complaints received, including the number of complaints received and how each was resolved, an assessment of any patterns, and any changes or improvements that were made in response to these patterns. Spence-Chapin has in place procedures to guide this process. Spence-Chapin cooperates with any requests made by the accrediting entity or Secretary to provide any information regarding complaints received.

Spence-Chapin has in place a Quality Improvement Program/System Description, managed by the Compliance Department. This process reviews and utilizes complaint data as a means to make systematic improvements to adoption services. Through reviewing stakeholder feedback and external data, trends are identifying, and changes or improvements are made to workflows and service quality and delivery, in accordance with regulations and best practices to serve needs of children and clients.