

## **96.41 Grievance/Complaint Policy and Procedures**

Hague Convention on Protection of Children and Co-Operation (“Convention”)  
Code of Federal Regulations 22 CFR 96 (“Regulations”)  
Intercountry Adoption Act of 2000 (“IAA”)  
Universal Accreditation Act of 2012 (“UAA”)

### **Hague Standards**

#### **96.41(b)**

This agency recognizes the right of any birth parent, prospective adoptive parent, adoptive parent, or adoptee to lodge directly with the agency signed and dated complaints about any of the services or activities of the agency (including its use of supervised 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, 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.

#### **96.41(c)**

The agency or person responds in writing to complaints received pursuant to paragraph (b) of this section within thirty (30) days of receipt, and provides expedited review of such complaints that are time-sensitive or that involve allegations of fraud.

#### **96.41(d)**

The agency or person maintains a written record of each complaint received pursuant to paragraph (b) of this section and the steps taken to investigate and respond to it and makes this record available to the accrediting entity or the Secretary upon request.

#### **96.41 (e)**

The agency or person 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 agency's or person's performance; or questioning the conduct of or expressing an opinion about the performance of an agency or person.

#### **96.41(f)**

The agency or person provides to the accrediting entity and the Secretary, on a semi-annual basis, a summary of all complaints received pursuant to paragraph (b) of this section 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 the agency or person pursuant to paragraph (b) of this section, along with information about what systemic changes, if any, were made or are planned by the agency or person in response to such patterns.

#### **96.41(g)**

The agency or person provides any information about complaints received pursuant to paragraph (b) of this section as may be requested by the accrediting entity or the Secretary.

#### **96.41(h)**

The agency or person has a quality improvement program appropriate to its size and circumstances through which it makes systematic efforts to improve its adoption services as needed. The agency or person uses quality improvement methods such as reviewing complaint data, using client

satisfaction surveys, or comparing the agency's or person's practices and performance against the data contained in the Secretary's annual reports to Congress on intercountry adoptions.

We encourage any grievance to be discussed with your Case Manager or social worker. You may also contact the Executive Director directly. Your satisfaction and successful completion of the service(s) we provide are important to us. We welcome the opportunity and are open to discuss any grievance or dissatisfaction you may have. Open discussions can often address the concern and resolve the issue satisfactorily. **That being said, this is not a requirement. 96.41(e) You may, at any time, lodge a complaint following the below procedure.**

**Procedure:**

The following steps should be followed by any **birth parent, prospective adoptive parent or adoptive parent, or adoptee** who may have a grievance or complaint with the care, treatment, or services they receive from the agency.

**Lodging a Complaint**

1. You may lodge directly with the agency a complaint about any of the services or activities of the agency (including its use of supervised providers) that you believe raise an issue of compliance with the Convention, the IAA, the UAA, or the regulations implementing the IAA or UAA. The complaint must be in writing, signed, and dated **96.41(b)**
2. The complainant needs to state the connection to the Convention, the IAA and/or the regulations in the written complaint in order to be actionable under 22 CFR 96.41. **HTC E.6a**
3. You may submit your complaint as
  - an attachment to an email to the Executive Director, Alaina Springer, LCSW-C, at [alaina.springer@adoptglobal.org](mailto:alaina.springer@adoptglobal.org);
  - an attachment to Global's general email at [maryland@adoptglobal.org](mailto:maryland@adoptglobal.org); or
  - mail through the United States Postal Service addressed to: Global Adoption Services, Inc., Attn: Alaina Springer, LCSW-C, 2046 Rushmore Court, Bel Air, Maryland 21015.
4. The Executive Director, or designated staff member, will review your complaint within two (2) business days of receiving it. The ED, or designated staff member, will conduct an internal investigation and respond to you within thirty (30) days of receiving the complaint. An expedited review of complaints that are time-sensitive or that involve allegations of fraud will be enacted within two (2) days of receiving the complaint. **96.41(c)**

If the subject of the complaint is regarding the Executive Director, the complaint will be forwarded to the President of the Board of Directors who will review your complaint, conduct an internal investigation, and respond to you in writing within thirty (30) days of receiving the complaint.

5. If the complainant is not satisfied with the ED's response, the complainant may send the complaint directly the Board of Directors via USPS or email to [maryland@adoptglobal.org](mailto:maryland@adoptglobal.org). The complainant may also request the ED to forward the complaint to the BOD. The BOD will have thirty (30) days to respond to the complaint.

6. A copy of the complaint, the agency’s investigation and response will be placed in the client’s file, and the agency’s general complaint file. **96.41(d)** The agency’s response will be emailed to the complainant and sent via regular mail through the USPS.
7. Internal investigations may include sharing the grievance with the appropriate Case Manager or social worker and a telephone conference with the complainant if warranted. The Executive Director will determine if corrective action is indicated.
8. The Executive Director is responsible for reporting on any complaint and the resolution at the agency’s next meeting of the Board of Directors if it has not already been forwarded to the board.
9. If for any reason the **birth parent, prospective adoptive parent or adoptive parent, or adoptee** is dissatisfied with the results of the resolution reached by the agency and believes the agency is not in compliance with the Hague Convention on Intercountry Adoption, the Intercountry Adoption Act (IAA), the regulations implementing the IAA, or the UAA (Universal Accreditation Act) they may file a complaint to The Hague Complaint Registry (HCR) on the Consular Affairs public website at [Complaint Registry \(state.gov\)](https://www.state.gov/complaint-registry). **96.41(b)**

Complaints regarding services received in the State of Maryland may be filed with The Office of Licensing and Monitoring, Department of Human Services, 311 W. Saratoga Street, 4<sup>th</sup> Floor, Baltimore, Maryland 21201. You may also call DHS at (410) 767-7871 for more information. **96.41(b)**

10. Since Global’s Hague Accreditation in 2008, Global has submitted to the accrediting entity and secretary, on a semi-annual basis, a summary of all complaints that may have been received during the preceding six (6) months (including the number of complaints received and how each complaint was resolved). These reports would also include an assessment of any discernible patterns in complaints and if such a pattern were present, what changes Global made or planned to be made as a result of such grievances. **96.41(f)**.

In addition to the semi-annual reports, Global provides any additional information about complaints received pursuant to paragraph (b) of this section as may be requested by the accrediting entity or the Secretary. **96.41(g)**

11. Global has a well-structured quality improvement program and makes systematic efforts to improve its adoption services. This program includes regular meetings, the participation of the Board of Directors, and keeping records of meetings. Global uses quality improvement methods including reviewing complaint data and client satisfaction surveys. **96.41(h)**

Acknowledgement of receipt of the grievance/complaint policy and procedure.

\_\_\_\_\_  
Applicant’s signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Co-applicant’s signature

\_\_\_\_\_  
Date

**Effective December 1, 2012**

**Rev. 09/22/16, 01/24/17, 07/17/18, 03/26/19; 11/01/2022; 04/18/2024**