



Level of Care for Procedure Reference:

Residential
Partial
Intensive Outpatient
Outpatient

## Grievance Policy and Procedure

### *Purpose Statement:*

In order to provide clients a means to express their concerns, to ensure the integrity of service, and to preserve the positive therapeutic environment that The Emily Program (TEP) strives to provide, TEP has instituted the following policy.

### *Policy*

The Emily Program will work with clients, their parents or legal guardians, all other involved team members, outside agencies or providers, including the Department of Health (DOH) and Department of Social and Health Services (DSHS), and staff to actively and objectively address client complaints or grievances (“grievances”) regarding any aspect of care. This policy will be explained in writing and orally to all clients.

### *Procedures*

#### **1. Process to Voice Concerns**

- a. The concern or question should be discussed first with the staff member with whom the concern primarily rests unless it is not feasible or comfortable for the individual.
- b. If discussing concerns with appropriate staff is not feasible, comfortable, or does not resolve the concern to the individual’s satisfaction, the concern should then be discussed with the staff member’s supervisor.
- c. If discussing concerns with the Supervisor is not feasible, comfortable, or does not resolve the concern to your satisfactions, the concern should then be given in writing or discussed with the Site Director. The Site Director will mediate a discussion between you and the staff person(s) involved whenever possible.
- d. If discussing concerns with the Site Director is not feasible, comfortable, or does not resolve the concern to your satisfaction, the concern should then be given in writing to the Compliance Team. At this point the concern becomes a grievance.

#### **2. Process to Voice Grievances:** Clients, their family members, legal representatives, guardians or concerned individuals may voice grievances verbally or in writing about The Emily Program to a staff member or to the Compliance Department at 1295 Bandana Square Blvd. W Suite 210, St Paul, MN 55108.

- a. Grievance forms are available on TEP’s website
  - i. Residential clients can also find the grievance form in the common room

- ii. Ohio residential clients may also file a grievance by contacting the Client Rights Officer at (216) 765-0500 ext. 2721.
- b. TEP staff can assist in the grievance process as appropriate or requested and will provide any necessary forms or assistance in filing a grievance.
- c. Staff will not attempt to influence the statement of any grievances during filing or investigation process.
- d. A client, family member, or staff member filing a grievance will not be subject to adverse action or retaliation by The Emily Program as a result of filing a grievance.
- e. Grievances can be submitted anonymously, in writing in an enclosed envelope, addressed to the Compliance Department.
- f. Grievances will be reported to the Executive Chairman upon request.
- g. Grievances are initially reviewed and investigated by the Compliance Department, involving additional staff as appropriate.
- h. Input from the client, family (if identified), and/or staff will be included in the investigation process.
- i. A confidential acknowledgement will be issued within five business days for grievances that are not filed anonymously. Once the investigation is complete, you will receive a resolution letter from the Compliance Department on your grievance. The resolution letter will include:
  - i. A summary of the investigation and the resolution reached.
  - ii. Instructions for appealing the initial resolution to the Grievance Appeals Committee if the issue was not resolved to mutual satisfaction.
  - iii. Notification that the individual that he or she will not be subject to adverse action as a result of filing the grievance.
- j. Grievance filing, investigation of the grievance, and initial and final resolution will be documented and maintained on file by the Compliance Department for two license periods for grievances related to licensed facilities, or 7 years for grievances related to non-licensed facilities.

### 3. Appeal Process

- a. Once the Compliance Department receives an appeal, the following process will occur:
  - i. Submit the appeal for review by the Grievance Appeals Committee.
    - a. The committee will be comprised of TEP representatives from both administrative and clinical departments.
  - ii. The original grievance and supporting documentation, as well as any findings will be submitted to the Grievance Appeals Committee for review
    - a. The Grievance Appeals Committee will determine if the appropriate actions were taken and if further action is required.
  - iii. The Grievance Appeals Committee may conduct its own investigation into the original grievance
  - iv. The Grievance Appeals Committee will provide a written response to the appeal within 30 days. Decisions by the Grievance Appeals Committee are final.

- 4. **Confidentiality and Anonymity:** Details of all formally reported grievances will remain confidential. The reporting party has the option of submitting a grievance anonymously by

indicating his/her preference on the grievance form or to the member of staff with whom they are filing the complaint. If a grievance is submitted anonymously, no follow-up contact with the reporting party regarding resolution will occur.

5. **Minnesota Sites: State Licensing Board Information** The Emily Program will provide contact information for state licensing boards for public data on licensed therapists, or to report practitioner specific complaints upon request:
  - a. The MN Board of Psychology, 2829 University Avenue SE, #320, Minneapolis, MN 55414-3237 (612-617-2230)
  - b. The MN Board of Social Work, 2829 University Avenue SE, #340, Minneapolis, MN 55414-3239 (612-617-2100)
  - c. The MN Board of Marriage & Family Therapy, 2829 University Avenue SE, #330, Minneapolis, MN 55414-3222 (612-617-2220)
  - d. The MN Board of Behavioral Health and Therapy, 2829 University Avenue SE, #210, Minneapolis, MN 55414-3250 (612-617-2178)
  - e. The MN Board of Medical Practice, 2829 University Avenue SE, #500, Minneapolis, MN 55414-3250 (612-617-2130)
  - f. The MN Board of Nursing, 2829 University Avenue SE, #200, Minneapolis, MN 55414-3250 (612-617-2270)
6. **Ohio Sites: State Licensing Board Information:** The Emily Program will provide contact information for state licensing boards for public data on licensed therapists, or to report practitioner specific complaints upon request:
  - a. Vern Riffe Center for Government and the Arts, 77 S. High Street Suite 1830  
Columbus, OH 43215-6108, phone (614) 466-8808 | fax (614) 728-7081  
Toll Free (877) 779-7446
  - b. CSWMFT Board, 50 West Broad Street, Suite 1075, Columbus, OH 43215-5919, Phone (614) 466-0912 | fax (614) 7298-7790
  - c. Cuyahoga County ADAMHS Board, 212 West 25<sup>th</sup> St. #600 Cleveland, OH 44113, Phone (216) 241-3400
  - d. Ohio Department of Mental Health and Addiction Services, 30 East Board St. #8  
Columbus, OH 43215, Phone (614) 466-2596
  - e. Disability Rights Ohio (formally Ohio Legal Rights Service), 50 W Board St Ste 4100,  
Columbus, OH 43215, Phone (614) 466-7264 / 1-800-282-9181
  - f. USDHS, 200 Independence Ave SW, Washing DC 20201, Phone 1-877-696-6775
7. **Washington Sites: State Licensing Board Information:** The Emily Program will appropriately cooperate with the Department of Health (DOH) and the Department of Social and Health Services (DSHS) regarding any complaint investigations. The Emily Program will also provide contact information for state licensing boards for public data on licensed therapists, or to report practitioner specific complaints upon request:
  - a. Washington State Department of Health, Health Systems Quality Assurance, Complaint Intake, P.O. Box 47857, Olympia, WA 98504-7857 Phone (800) 633-6828
  - b. Washington State Department of Health, Health Systems Quality Assurance (for information on psychologists, social workers, marriage & family therapists, and mental health counselors) P.O. Box 47877, Olympia, WA 98504 Phone (360) 236-4700

- c. Washington State Department of Health, Medical Quality Assurance Commission (for information on physicians) P.O. Box 47866, Olympia, WA 98504 Phone (360) 236-2750
  - d. Washington State Department of Health, Nursing Care Quality Assurance Commission (for information on nurses) P.O. Box 47865, Olympia, WA 98504 Phone (360) 236-4700
  - e. Washington State Behavioral Health and Recovery (DBHR) complaint manager can be contacted at 360-725-3752 or DBHRcomplaintmgr@dshs.wa.gov
8. **Pennsylvania State Licensing Board Information** The Emily Program will provide contact information for state licensing boards for public data on licensed therapists, or to report practitioner specific complaints upon request:
- a. Professional Compliance Office, Department of State, P.O. Box 2649, Harrisburg, PA 17105-2649
  - b. State Board of Social Workers, Marriage and Family Therapists and Professional Counselors P.O. Box 2649, Harrisburg, PA 17105-2649 Phone - (717) 783-1389 Fax - (717) 787-7769 ST-SOCIALWORK@PA.GOV

References:

*Grievance Form*  
WAC 388-877  
WAC 388-877A  
WAC 246-337