

JUSTICE RESOURCE INSTITUTE	
<b>POLICY NUMBER:</b>	<b>RI-007</b>
<b>POLICY NAME:</b>	<b>Resolving Complaints &amp; Grievances</b>
<b>REVIEW/REVISED DATE:</b>	<b>November 19, 2024</b>

## GENERAL POLICY STATEMENT

Anyone concerned about the treatment of the persons served by Justice Resource Institute (JRI) programs and services, including the person themselves, may express a complaint, and JRI leadership will follow procedures to resolve the matter, respecting the rights of each person.

Complaints and related grievances are acted upon in a timely manner in accordance with written guidelines, and are subject to an appeals process. The words "complaint" and "grievance" are used interchangeably in this policy. Programs that are required to follow regulations of a contracting agency for complaint reporting/investigations will follow those requirements. All complaints, including those reported to contracting agencies, will be logged and acted upon by JRI in accordance with this policy.

This policy outlines the procedures to be followed to assist persons in making complaints and for resolving them.

**APPLICABILITY** – **All Programs** with additional sections included as applicable

## PRIMARY RESPONSIBILITY - Administrative Team

## PROCEDURES

**Note:** **Department Mental Health (DMH) programs** follow the procedures and use forms as required by DMH

1. Justice Resource Institute programs appoint Human Rights Officers to oversee the implementation of this and other human rights policies.
  - 1.1. The Human Rights Officer works with program staff and the person served to ensure that filing a complaint will not result in retaliation or barriers to services.
  - 1.2. The Human Rights Officer is also responsible to ensure that the Notice of Right to File Complaints is posted visibly in the program and that Complaint Forms are available in several locations so that they can be accessed and submitted without staff assistance.
2. Complaints are defined as any situation that arises from a concern about the treatment of the persons served by JRI programs and services. This includes any situation or action that the person submitting the complaint may have considered to be dangerous, illegal, or inhumane, violated the JRI Rules of Conduct or violated professional ethics.
3. "Informal Complaints" - Any person served (or any other interested party, including staff, parents, advocates, etc.) who has a complaint or grievance will be encouraged to **first** discuss the matter with the staff involved. The staff will work with the person to resolve the situation, and may involve their supervisor in facilitating the resolution. Any person may initiate a grievance for any situation simply by speaking or writing to the Clinical Director, Program Director, the Rights Officer, or any staff person and describing the situation. Such a situation is reported to the Program Director no later than the next business day.
  - 3.1. Within three business days staff will inform the person initiating the complaint of the course of action that will be taken, including the projected time frame for investigation and responses, and that their complaint will not result in retaliation or barriers to services.
  - 3.2. If the complaint is not resolved at this level, or if the person or other party chooses, a Formal Complaint may be submitted: in writing by completing the JRI Complaint Form or writing the complaint on paper or in email communication to the Program Director or Human Rights Officer.

4. Forms to submit Formal Complaints are made readily available in several locations in the program, as well as from the Rights Officer. A person may also initiate a formal complaint by speaking to the Rights Officer or any other senior program staff and describing the situation.
  - 4.1. The Rights Officer and all staff are available to direct or assist any persons who need help in filing a complaint.
  - 4.2. Completed complaint forms may be delivered in sealed envelope, deposited in a designated Rights container available to persons, staff, and visitors OR by following program-specific procedures for submitting completed complaint forms. The Rights Officer or designee will log the complaint, and report it to the Program Director (or designee) by the next business day. NOTE that both Internally Supported Complaints and all other complaints need to be logged and reviewed at the program level.
  - 4.3. **Juvenile Court Clinic**: Notices and forms are posted and available in offices shared with Probation Officers and/or other court personnel when JRI employees are present.
  - 4.4. Programs may also utilize other means for reporting complaints which are documented on the program specific addendum, CARE 002 A Boundaries Addendum.
5. If the issue described/reported may be defined as a Critical Incident, including any form of abuse, the staff will immediately contact the Program Director or designee who will follow the procedures listed in the policy on Reporting Critical Incidents (RI-007)
6. **For issues that are not defined as Critical Incidents**, the Rights Officer or designee will investigate the situation, undertaking corrective action where necessary within three business days.
  - 6.1. If the issues complained of are not clear cut or require further investigation, the Rights Officer may refer the issue to Program Director or designee for resolution.
  - 6.2. The person or other complaining party is then informed of this decision or of the actions taken to address the complaint, which will also be kept in writing by the Rights Officer. The decision will be communicated to the person in a manner that is understandable to the person.
  - 6.3. If a complainant is not satisfied with the response, they can appeal to the supervising Vice President/Division Director within three days of receiving the response. The supervising Vice President/Division Director is responsible for review of the appeal and for notifying the person of the resolution within ten working days.
7. The complainant also has the option of consulting with an attorney or with legal services available to the population served or other public advocacy group.
8. Any staff or other person who witnesses, discovers, or is notified of conduct which may be considered to be physical or sexual abuse, excessive force, psychological abuse, neglect or exploitation is responsible for taking actions as outlined in the JRI policy on Reporting Abuse and Neglect (RI-005).
9. Internally Supported complaints are logged into the CATS system for use in aggregation and reports to the Safe Programs Committee as representative of the Governing Body.
  - a. Internally Supported Complaints must meet the following criteria:
    - The situation or action was actually or potentially Dangerous, Illegal, or Inhumane, and/or
    - Violated the JRI Rules of Conduct, and/or
    - Violated professional ethics, and
    - **Does not** include anything falling into the Critical Incidents category. These are tracked and reported separately from Complaints.
  - b. All Internally Supported complaints will be reviewed in the aggregate as well as individually at the Program level. The JRI Quality Management Team will identify trends in Internally Supported Complaints and areas needing improvement. Allegations of abuse are **not** included in this aggregated data, as such allegations are reported separately (as Critical Incidents). Actions will be taken as indicated to address unresolved complaints.
10. **Accreditor, Licensor, and Payer Contacts**
  - **CARF**: Feedback or concerns may be provided by online form, phone, fax, letter, or email.  
 CARF, 6951 East Southpoint Road, Tucson, AZ 85756-9407  
 (866) 510-2273 or Fax (520) 318-1129  
 feedback@carf.org or online form at <http://www.carf.org/contact-us/>
  - **Joint Commission**: All persons served, family members, and staff are informed (through program handbooks, posted notices, and/or mailings) that if they have any concerns about safety or quality of services provided by the program that has not been addressed by the program, they have the right to contact the Joint Commission by phone, fax, letter, or email.

The Joint Commission, One Renaissance Blvd., Oakbrook Terrace, IL 60181  
800-994-6610 or Fax: (630) 792-5636 [complaint@jointcommission.org](mailto:complaint@jointcommission.org)

- **Carelon (Beacon Health Options)** members may make a complaint by phone by calling the (800) number on the back of the member's identification card to speak to Customer Service.
- **BSAS licensed programs** may contact the Massachusetts Substance Use Helpline at - [HELPLINE.org](http://HELPLINE.org) or call 1-800-327-5050
- **MBHP** members may make a complaint by phone at MBHP Clinical Access Line at 1-800-495-0086.
- **Other insurances** – persons who have other insurances are informed of their rights to make complaints about the services provided and the process to do so.

**11.** If a person believes that their civil rights have been violated, they can call their Attorney General's Office.

#### **Related Documents**

RI-001 Right and Responsibilities of Persons Served

RI-004 Human Rights Officer and Human Rights Committee

RI-005 Reporting Abuse and Neglect