

**ADOPTION LINKS WORLDWIDE
INTERCOUNTRY ADOPTION COMPLAINT REGISTRATION, RESPONSE
AND REPORTING POLICY
(96.41)**

- I. **POLICY**. To permit ALW clients, freely and without risk of retaliation, to bring to the attention of ALW any concerns, comments and complaints relating to intercountry adoption services provided by or through ALW, and to ensure that all such concerns, comments and complaints are promptly and appropriately registered, responded to and reported as required by the Act and Regulations.

- II. **PROCEDURE**. All persons receiving intercountry adoption services from or through ALW may bring to the attention of ALW any concern, comment or complaint regarding any aspect of the services provided. Persons desiring to bring a Complaint will be provided a Complaint Form which may be used, although Complaints will be received and processed by ALW in accordance with this Policy in any reasonable form, so long as they are in writing, signed, dated and delivered to:

Adoption Links Worldwide
5017 Leavenworth Street, Suite 1
Omaha, Nebraska 68106
Attn: Director of Social Services

All Complaints will be registered, responded to, and reported in accordance with the following requirements of the Act and Regulations:

- a. ALW shall permit any Complainant to lodge directly with ALW a Complaint about any of the services or activities of ALW (including its use of supervised providers) that he or she believes raise an issue of compliance with the Convention, the Act, or the Regulations, and ALW shall advise such Complainant of the additional procedures available to the Complainant, as set forth in IV. below, if the Complainant is dissatisfied with ALW's initial response to the Complaint.

- b. ALW shall respond in writing to Complaints within thirty (30) days of receipt, and shall provide expedited review of Complaints that are time-sensitive or that involve allegations of fraud.

- c. ALW shall maintain a written record of each Complaint and the steps taken to investigate and respond to the Complaint and shall make this record available to the Accrediting Entity or the Secretary upon request. Such records shall be maintained on a Complaint Report for each Complaint or in such other reasonable form as circumstances may require.

- d. ALW shall 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 ALW's performance; or questioning the conduct of or expressing an opinion about the performance of ALW.
- e. ALW shall provide to the Accrediting Entity and the Secretary, on a semi-annual basis, a summary of all Complaints received 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 ALW, along with information about what systemic changes, if any, were made or are planned by ALW in response to such patterns.
- f. ALW shall provide any information about Complaints received as may be requested by the Accrediting Entity or the Secretary.
- g. ALW shall maintain a quality improvement program appropriate to its size and circumstances through which it makes systematic efforts to improve its adoption services as needed. Under the quality improvement program, ALW shall:
 - 1. maintain records (including a Complaint Report) relating to each Complaint, including the date received, the nature of the Complaint, and the action(s) taken by ALW staff in response to the Complaint;
 - 2. summarize data relating to Complaints (including data necessary to provide required semi-annual reporting to the Accrediting Entity as required by the Act and Regulations), and review Complaint data on a periodic basis;
 - 3. use client satisfaction surveys as and when deemed appropriate by the Executive Director;
 - 4. compare ALW's practices and performance against the data contained in the Secretary's annual reports to Congress on intercountry adoptions within a reasonable time after the same are made available;
 - 5. take such other steps as the Executive Director may deem appropriate from time to time.

III. Additional Procedures. In the event that the Complainant finds the response provided by ALW to be insufficient to resolve the Complaint, the Complainant may request that the Complaint be given additional

consideration by the Executive Director (or, by the Chairperson of the Board if the Complaint involves the Executive Director), and the Executive Director (or Chairperson, as applicable) shall respond to such request within thirty (30) days of receipt of such request after it is received. A Complainant shall have any and all rights available under applicable law to contact the Accrediting Entity or the Secretary and/or any appropriate state licensing authority in the event that the resolution of the Complaint remains unsatisfactory to the Complainant.

- IV. Availability of Policy.** ALW shall maintain this written Policy in accordance with the Act and Regulations and shall provide a copy of this Policy, including contact information for the Complaint Registry, to client(s) at the time the adoption services contract is signed.