

**PATHWAYS COUNSELING CENTER, INC
POLICY & PROCEDURE MANUAL**

DATE APPROVED: 01/16/03

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DATE REVIEWED/REVISED: 7/16/14

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POLICY: CLIENT GRIEVANCE PROCEDURE

I. NOTIFICATION PROCEDURES: If any client has a grievance with either the program or the staff, she/he should follow this procedure:

- A. All Corporation clients shall receive an oral explanation and a written copy of the Corporation's Policy on Client Rights at the time of intake or next subsequent appointment.
- B. In a crisis or emergency situation, the client shall be verbally advised of the right to consent to (or to refuse the) offered treatment; and advised of the consequences of that agreement/refusal.
- C. The Corporation C.R.O. shall post, at a location conspicuous to and frequented by clients, a full copy of the Corporation Policy Statement on Client Rights/Confidentiality/Civil Rights and the Client Grievance Procedure.
- D. Each staff person shall document Corporation compliance of having completed an oral and written explanation of the Policy Statement on Client Rights/Confidentiality/Civil Rights and Client Grievance Procedure by placement of Client signed copies of such notification/explanation in the Client's record.
- E. Each Corporation employee shall be required to complete a training session on this Policy Statement on Client Rights (and its attendance documented) as a part of an orientation process of new employees; and each continuing employee shall complete an annual in-service on the Corporation's Policy Statement on Clients Rights/Confidentiality/Civil Rights and the Client Grievance Procedure.

II. CLIENT RIGHTS OFFICER:

- A. The officer of the Corporation designated, as Clients Rights Officer (CRO) shall be the Executive Director or Designee of the Corporation.
 - 1. CRO: Executive Director
 - 2. Location: 835 N. Locust St., Ottawa, Ohio 45875
 - 3. Hours Available: Monday through Friday: 9:00 a.m.-4:00 p.m.
 - 4. Telephone: (419) 523-4300
- B. In event of the filing of a grievance alleging involvement of the Executive Director of the Corporation, the President of the Board of Trustees shall be designated to fulfill the responsibility of CRO.
- C. The Corporation CRO shall have authority and responsibility to take all steps necessary to assure compliance with this policy statement on Client Grievance Procedure; including:
 - 1. assure the maintenance of records of all grievances received;
 - 2. immediately initiate an investigation of all grievances received;
 - 3. complete a timely study of grievance issues; and prepare a report of findings, including recommendations for resolution of grievance issues.

III. GRIEVANCE PROCEDURE:

- A. Any client who believes that he/she has been subjected to a violation of his/her rights may file a "Notification of Grievance" which must be in writing, signed, and dated by the client or the individual filing the grievance on behalf of the client, as soon as possible following the occurrence of the alleged violation.
- B. The Client, when filing a grievance, shall be entitled to the following:

1. An explanation of the Grievance Procedure from the original filing of the written, signed, and dated Notification of Grievance to final Notification or Resolution of Grievance filing issues.
 2. Assistance to grievant client by client rights representative, Office Director, in filing of grievance.
 3. Availability of a Corporation Staff member to assist Client at any point in the grievance procedure if desired by client.
- C. A written Notification of Grievance shall be:
1. Given/filed with the Clients Rights Officer (CRO), Executive Director
 2. Filed at (or mailed to):
835 N. Locust St.
Ottawa, OH 45875
 3. Filed Monday - Friday, 9:00 a.m. - 4:00 p.m.
An oral explanation of this filing process shall be available to clients by calling (419) 523-4300. In the absence of the CRO, the grievance can be given to the Office Director.
- D. A written Notification of Grievance shall contain at least the following information:
1. Type of incident/alleged Client Rights Violation;
 2. Date, approximate time, place and description of incident/alleged Client Rights Violation;
 3. Name of individual(s) responsible for incident/situation/ alleged Client Rights Violation being grieved;
 4. Name, address, telephone number, date of grievance and signature of grievor with the date filed; and
 5. Name, address, and telephone number of grievor's representative (if applicable).
- E. Following a written Notification of Grievance, the Corporation CRO shall:
1. Notify the President of the Corporation's Board of Trustees that a written Notification of Grievance has been received. Then date and sign the received notice and date and send written acknowledgement to the Griever;
 2. Conduct a prompt and thorough investigation of the complaint;
 3. Hold an administrative hearing on issues of grievance; including testimony from grievor and other persons party to the grievance complaint; including opportunity for parties to have a personal representative of their choice present and acting on their behalf; and including the right to request the use of an impartial decision-maker to hear grievance complaint.
 4. Determine, following the investigation and administrative hearing, whether or not a violation of Client Rights did occur; and
 5. Prepare and date written notification and explanation of the resolution of the violation of Client Rights.
- F. Written Notification of Grievance review time-line.
- Upon the filing of a written Notification of Grievance, the following review time-line shall be utilized to accomplish an orderly and timely review and resolution of the grievance issue.
1. Within three (3) working days following the receipt of a grievance, the CRO shall send a written acknowledgement of receipt of the grievance. This written acknowledgement will include, the date grievance was received, a summary of the grievance, an overview of the grievance process, a timetable for completion of the investigation and notification of resolution, and the treatment provider's contact name, address, and telephone number. The CRO will schedule a face-to-face meeting with the grievant person (and/or designated representative) to discuss and clarify the issues giving rise to the original complaint, and shall attempt to resolve issue as appropriate. A dated, written notification of the resolution will be issued to the client whenever a resolution is reached.
 2. If the complaint remains unresolved at five (5) working days, the CRO shall notify all parties of the unresolved written complaint that the investigation is continuing toward administrative hearing. The CRO shall prepare a written notification indicating what has occurred thus far in the resolution process.
 3. Within ten (10) working days, an impartial decision-maker, the President of Pathways Counseling Center, Inc.'s Board of Trustees shall schedule and conduct an administration hearing on issues of the written Notification of Grievance.
 4. Within twenty (21) calendar days of receipt of the grievance, the Corporation's CRO (or an impartial decision-maker designated by CRO for this purpose) will make a resolution decision on the grievance. Any extenuating circumstances indicating that this time period will need to be extended must be documented in the grievance file and written notification will be given to the client or persons filing grievances on the client's behalf.

G. The written notification and explanation of the resolution/final outcome of the violation of Clients Rights shall be prepared, dated, and mailed by Certified Mail to the Griever (or Griever's representative) within twenty-one (21) calendar days from the date of filing of the written Notification of Grievance.

H. Outside entity option: The Griever shall have the option, **at any time**, to file a grievance with outside organizations that include but are not limited to the following:

Pathways Counseling Center, Inc.
Trustees
835 North Locust Street
Ottawa, OH 45875
Telephone: (419) 523-4300

Mental Health, Alcohol & Drug Addiction
Recovery Board of Putnam County
P.O. Box 410, 835 N. Locust St.
Ottawa, OH 45875
Telephone: 419-523-0027

Ohio Department of Mental
Health & Addiction Services
James A Rhodes State Office Tower
30 East Broad Street, 8th Floor
Columbus, Ohio 43215-3430
Telephone: (614) 466-2596

Office of Civil Rights
U.S. Department of Health/Human Services
233 N. Michigan Ave., Suite 240
Chicago, Illinois 60601
Telephone: (800) 368-1019
TDD/TTY: (800) 537-7697

Ohio Legal Rights Service
50 West Broad St, Suite 1400
Columbus, Ohio 43215-5923
Telephone: 800-282-9181
Telephone: 614-466-7264

Relevant addresses and telephone numbers for these outside entities shall be posted in a conspicuous location frequented by clients, and shall be provided to the griever at the time of written notification and explanation of the resolution.

The Corporation shall provide, upon written request, all relevant information about the written Notification of Grievance to one or more of these outside entities to which the griever has initiated a complaint.

I. The Corporation shall make provision for the posting of the Client Grievance Procedure in a place accessible by clients and each client shall be given at admission a copy of the written grievance procedure. This will be documented in the client record.

J. The Corporation shall provide training so that each employee, contract staff, volunteer, and student intern is familiar with the Corporations Client Rights/Confidentiality/Civil Rights Policy and Client Grievance Procedure. This will be documented in each employees personnel file.

IV. IMPLEMENTATION & MONITORING:

A. The program shall maintain for two (2) years from resolution the records of written client grievances, which includes (1) a copy of the grievance, (2) documentation reflecting process used and the grievance resolution/remedy, (3) documentation, if applicable, of extenuating circumstances for extending the time period for resolving the grievance beyond twenty-one (21) calendar days, and (4) a copy of the letter to the grievant reflecting the resolution.

B. The President of the Board of Trustees shall annually review the implementation of the Clients Grievance Procedure and shall receive annually the CRO summary of the number and types of grievances received and the resolution status of the grievances.