



All Blessings International, Inc.

Licensed in Kentucky, Indiana, Missouri, and Tennessee

MAIN OFFICE:

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ABI BUSINESS AGREEMENT - SUPPLEMENT A

CLIENT COMPLAINT POLICY AND RESOLUTION PROCESS DISCLOSURE

This supplement is intended to ensure that all ABI clients are aware of ABI's official Grievance and Complaint Policy and procedures. This supplement must be signed & returned along with the ABI Business Agreement. Please retain a copy of this information for future reference.

Title: Grievance and Complaint Policy- 96.41 (a)

Policy: The Agency maintains a written complaint policy and procedure that is available for review upon request and which is provided to each family utilizing the agency's services for adoption. This policy is online and provided in summary form within initial materials that inquirers receive. It is also distributed with all Business Agreements and must be signed and returned to ABI. Contact information for the Hague Complaint Registry is provided to clients with the Complaint Policy and Procedure 96.41 (a). All decisions shall be made with the best interests of the child as being of the utmost importance.

Purpose: To the best of its ability, the agency will provide honest, responsible, and efficient inter-country adoptions according to regulations put forth by the Hague Convention, INA, IAA, UAA, the Federal government, and the States where ABI is licensed. In the event that a family feels that there has been non-compliance with the Hague Convention, IAA, UAA, agency, or governmental procedures, they will have the opportunity to file a written complaint or grievance and expect a response from the agency, in writing within 30-days of receipt of the complaint or grievance.

Scope: The procedures outlined below will apply to every client/family who has engaged the agency for child-placement, homestudy, and/or post-placement/post-adoption services or any prospective client (all referred heretofore as "clients" for purposes of simplicity, rather than to delineate a required contractual or service relationship between the two parties).

Procedure:

1.0 GENERAL POLICY GUIDELINES

- 1.1 The Complaint/Grievance Procedures will contain pertinent contact information for the Executive Director of the agency, as well as the contact information for the Hague complaint registry.
- 1.2 The agency provides a summary of this Complaint/Grievance Policy to all people inquiring about agency services and the specific Policy and Procedures in full with each Business Agreement distributed.

- 1.3 Birth parent(s), prospective adoptive parent(s) or adoptee(s) may directly lodge a written complaint with the agency anytime the individual feels there is an issue of non-compliance with the Convention, IAA, UAA, the regulations implementing the IAA (including the use of supervised providers), and ABI advises such individuals of the additional procedures available to them if they are dissatisfied with the agency's response to the complaint 96.41 (b).
- 1.4 The agency 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 performance; or questioning the conduct of or expressing an opinion about the performance of the agency 96.41 (e).

2.0 DEFINITIONS: INFORMAL GRIEVANCE VERSUS FORMAL COMPLAINT

2.1 Informal Grievances are those instances in which a client is requesting clarification or concerns, not seeking to initiate the formal complaint process.

- A. The Agency encourages open and honest discussion among its personnel and clients. As services are provided, it is expected that clients may experience confusion or personality differences with staff. Clients are encouraged to directly contact the Executive Director in any such situation and ABI staff are directed to refer circumstances of concern to the Executive Director as soon as aware. The Executive Director shall immediately seek to resolve any lack of satisfaction.
- B. In these instances the client or prospective client shall be reminded about the formal complaint procedures and advised that they may avail themselves of the formal complaint process without retribution should they desire to do so, utilizing the ABI Complaint Procedures.
- C. Unless the client seeks to formally lodge a complaint with the agency through the complaint procedures, situations that are resolved through intervention, attention, hand holding, discussion, etc. shall not be recorded as formal complaints for the purposes of this policy & procedures.
- D. The intent of the policies and procedures is not to discourage clients from seeking clarification, additional attention, making suggestions or otherwise letting staff know how best to meet their unique needs by formalizing normal and anticipated interactions in the course of day to day business. Recognizing that the formalization of these interactions is likely to cause clients to fear retribution, even though informed that this will not occur, ABI has chosen the above definition of Informal Grievances.

2.2 Formal complaints are defined as specific correspondence submitted in writing to ABI, following the prescribed procedures, with the goal or intent of lodging a complaint.

3.0 FORMAL COMPLAINT FILING PROCESS STEPS & REQUIREMENTS

- 3.1 Formal complaints must be submitted in written form via verifiable means of delivery to the agency's primary business location in Owensboro, Kentucky, directed to the Executive Director. Email submission is not an acceptable means for formal complaint submission, although would initiate informal grievance resolution seeking.

- 3.2 It is the complainant's responsibility to ensure that the complaint has been received by the agency.
- 3.3 Formal complaints must include the following pieces of information:
 - A. Complainant's Name
 - B. Complainant's current address and contact information, to at minimum include one telephone number.
 - C. Description with specificity of the activity or service upon which the complaint is based, including the date(s) involved and the individuals involved.
 - D. The client's relationship with the agency.
- 3.4 Clients are encouraged to articulate their ideal resolution of the complaint and to submit any documentation which they believe would aid in the evaluation of the complaint by the Executive Director.
- 3.5 Complaint must be signed and dated.
- 3.6 Complainant may request an expedited review (within 10 days of receipt) if the complainant alleges that the complaint is of a time sensitive nature or involves fraud.
- 3.7 Complainant is expected to be cooperative with the agency's evaluation of the complaint.

4.0 Formal Complaint Agency Response

- 4.1 The Executive Director shall review complaints or grievances expeditiously and shall respond in writing within 30-days of receipt of the original complaint. Expedited review and response within 10 days of receipt will occur for complaints of a time sensitive nature or those involving allegations of fraud 96.41 (c).
- 4.2 Upon receipt of a complaint the Executive Director shall initiate an internal review of the matter, which may include, but is not limited to requesting additional information from the complainant, consulting with ABI staff and/or other involved agencies, agency policy and procedure review, convening a special meeting of the Board of Directors, meeting with the complainant and/or review of the clients documentation. Should a Board of Directors meeting be convened the Board shall respond, along with the Executive Director, within 10 days of the meeting, but no later than 30 days from receipt of the original complaint.
- 4.3 Within 30 days the Executive Director shall respond in writing via certified delivery (UPS/Fed Ex/USPS, or other) to the complainant's address provided with the formal complaint.
- 4.4 Should the complainant be dissatisfied with the response from the Executive Director, he/she should follow the previously described procedures (section 3.0) for directing the complaint to the Board of Directors to appeal the determination of the Executive Director. If the original agency response already included a Board reply, this step may be eliminated.
- 4.5 An appeal directed to the Board of Directors shall be responded to by the Board in writing within 10 days of the meeting of the Board, but no later than within 30 days from the receipt of the appeal.
- 4.6 Failure of a complainant to respond to the agency's initial written reply within 60 days of client's receipt shall be considered by the agency as client acceptance of the agency's response.

- 4.7 Please note that the accrediting entity responsible for reviewing Hague complaint registry submissions is tasked with verifying that the complainant has already attempted to seek resolution through the agency's internal complaint procedures prior to consideration.

5.0 Complaint Record & Reporting

- 5.1 The agency maintains a written record of each complaint received regarding allegations of non-compliance with the Convention, the IAA, and the regulations implementing the IAA, the UAA and the steps taken to investigate and respond to the complaint and makes this record available to the accrediting entity or the Secretary upon request. Within the maintained record the following facts are recorded: Date the complaint was received, Complainant (Complaining Party), Complaint Issues, and Steps Taken to Resolve Complaints 96.41 (d).
- 5.2 The agency provides to the accrediting entity and the Secretary, on a semi-annual basis, a summary of all complaints received concerning compliance with the Convention, the IAA and/or the regulations implementing the IAA and the UAA during the past six months, which includes the number of complaints received and how each complaint was resolved and an assessment of any discernible patterns in complaints received against the agency, along with information on what systemic changes if any the agency has made or plans to make in response to such patterns. The agency provides any information about complaints as may be requested by the accrediting entity or Secretary in addition to the information provided on a semi-annual basis. Should no complaints be recorded the agency will still create and submit whatever report is requested by the accrediting entity 96.41 (f & g).

6.0 Arbitration Provision

- 6.1 Any dispute that has not been resolved as specified above shall be settled by arbitration with the then current commercial arbitration rules of the American Arbitration Association (AAA) by a sole arbitrator. The place of the arbitration shall be the ABI offices in Owensboro, Kentucky. The decision rendered by the arbitrator shall be final and judgment may be entered upon the award of any court having jurisdiction.

ALL BLESSINGS INTERNATIONAL, INC. EXECUTIVE DIRECTOR CONTACT INFORMATION:

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U.S. DEPARTMENT OF STATE COMPLAINT REGISTRY

The U.S. Department of State is committed to upholding the ethical standards, professional practices, and principles set forth in the Hague Convention on Intercountry Adoption, the Intercountry Adoption Act of 2000 (IAA), and the Federal implementing regulations. The Hague Convention on Intercountry Adoptions Complaint Registry will forward your complaint to the appropriate Accrediting Entity for action, and the Department will monitor complaints about accredited agencies or approved persons after receiving information from you.

To submit a complaint, simply go to <http://adoptionusca.state.gov/HCRWeb/WelcomeForm.aspx> and click the

Confirm button when finished. If you wish, you may also print out a form and fax it to the U.S. Central Authority at 202-736-9080 or mail it and any supporting documents to:

Attn: U.S. Central Authority
U.S. Department of State
Bureau of Consular Affairs
Office of Children's Issues, Adoption Unit (SA-29)
2201 C Street, NW
Washington, DC 20520

You can also request that these forms be sent to you by calling the Department of State at (888) 407-4747.

By signing below I/we hereby affirm receipt of and understanding of the ABI Complaint Policy and Procedures.

Adoptive Applicant #1

Date

Adoptive Applicant #2

Date