

ASPIRE BEHAVIORAL ACADEMY

COMPLAINT AND GRIEVANCE POLICY

Patient and Caregiver Complaints and Grievances

1.0 Purpose

This policy establishes the process by which Aspire Behavioral ACADEMY (“ABA”) receives, documents, investigates, and resolves complaints and grievances submitted by patients and caregivers. ABA is committed to a straightforward reporting mechanism that preserves the confidentiality of the parties involved to the extent possible, protects complainants from retaliation, and ensures that concerns are addressed promptly, fairly, and in compliance with applicable state and federal regulations.

2.0 Scope

This policy applies to all complaints and grievances submitted by patients, caregivers, or their authorized representatives regarding any aspect of services provided by ABA, including but not limited to clinical care, staff conduct, scheduling, billing, communication, privacy, and safety.

3.0 Policy Statement

ABC shall:

- Maintain a straightforward grievance reporting mechanism that strives to preserve the confidentiality of parties involved and does not result in retaliation against the complainant.
- Maintain grievance policies and procedures that incorporate applicable regulations, including reporting to external oversight agencies when applicable.
- Assign staff or hire consultants with an appropriate level of access, experience, and expertise to manage the complaints and grievances system on behalf of patients and caregivers.

4.0 Communication of the Process

ABC communicates the availability of its complaint and grievance process to caregivers and patients through multiple channels and at multiple points in the service relationship. Caregivers and patients receive written information about the complaint and grievance procedures as part of the intake packet, which includes the Parent Handbook, the Notice of Privacy Practices, and the Patient/Caregiver Rights and Responsibilities document. These materials are reviewed with the caregiver prior to signature and are available in translated format for families whose primary language is not English. The description of complaint and grievance procedures is also included in the organization's service agreement and posted in the clinic's common areas.

5.0 Submitting a Complaint or Grievance

Patients and caregivers may submit a complaint or grievance through any of the following channels:

- Verbally to any staff member or supervisor.
- In writing via email or the Complaint Submission Form.
- Through the organization's anonymous reporting system.
- By mail.

Staff members who receive a verbal complaint from a caregiver or patient are required to document it and escalate it to the Compliance and Ethics Officer or HR within one (1) business day, regardless of the complaint's perceived severity.

6.0 Review and Response Process

All complaints are entered into the Complaint and Grievance Tracking Log by the Compliance and Ethics Officer within one (1) business day of receipt. The Compliance and Ethics Officer acknowledges receipt in writing to the complainant within three (3) business days and initiates a formal review within five (5) business days. The review process involves document review, staff interviews, and consultation with clinical or administrative personnel as warranted by the nature of the concern. Written determinations are issued within thirty (30) calendar days for formal complaints. For less complex concerns resolved at the informal step, resolution is documented by the receiving staff member or supervisor and entered into the tracking log.

Serious concerns: Complaints involving alleged abuse, neglect, discrimination, safety incidents, or HIPAA violations are escalated immediately to the Compliance and Ethics Officer and, when applicable, to the Executive Director and appropriate external bodies, including the Massachusetts Department of Children and Families (DCF), the Disabled Persons Protection Commission (DPPC), and the Office for Civil Rights (OCR). Contact information for these agencies is provided in Appendix A.

7.0 Escalation and External Reporting

Caregivers and patients who are not satisfied after the internal resolution process are provided written information about their right to escalate the matter to the Executive Director, to contact their insurance payer, or to file a complaint with the Massachusetts Department of Public Health or other applicable external oversight bodies. ABA cooperates fully with all authorized external reviews. Agency contact information is provided in Appendix A.

8.0 Confidentiality and Non-Retaliation

ABC strives to preserve the confidentiality of the complainant and any individuals named in a complaint throughout the review process, sharing information only with those who have a legitimate need to know in order to investigate and resolve the concern. No patient, caregiver, or family member shall experience any change in the quality of, or access to, care as a result of filing a good-faith complaint or grievance. Any staff

member found to have retaliated against a complainant is subject to disciplinary action up to and including termination.

9.0 Recordkeeping

Each entry in the Complaint and Grievance Tracking Log includes the date received, complainant type, the category of the complaint, a brief description, the assigned investigator, investigation notes, resolution, and closure date. The tracking log is maintained as a confidential document with a minimum seven (7)-year retention period.

10.0 Responsible Parties

The Compliance and Ethics Officer is responsible for oversight and administration of this policy. The Executive Director is responsible for review of escalated complaints and for ensuring organizational compliance with all applicable external reporting requirements.

Appendix A External Oversight Agency Contacts

The agencies below may receive complaints referenced in Sections 6.0 and 7.0. Contact information should be reconfirmed periodically, as agency addresses and phone numbers are subject to change.

Agency	Address	Phone	Jurisdiction
Massachusetts Department of Children and Families (DCF)	600 Washington Street Boston, MA 02111	Child-at-Risk Hotline: (800) 792-5200 Main Office: (617) 748-2000	<i>Suspected child abuse or neglect</i>
Disabled Persons Protection Commission (DPPC)	300 Granite Street, Suite 404 Braintree, MA 02184	Abuse Hotline: (800) 426-9009 Main Office: (617) 727-6465	<i>Abuse/neglect involving persons with disabilities</i>
Office for Civil Rights (OCR) — HHS Region 1 (New England)	John F. Kennedy Federal Building 15 New Sudbury Street, Room 1875 Boston, MA 02203	(800) 368-1019 TDD: (800) 537-7697	<i>Civil rights & HIPAA privacy complaints</i>
Massachusetts Department of Public Health (DPH)	250 Washington Street Boston, MA 02108	(617) 624-6000	<i>Complaints regarding licensed health & human services</i>