



COMPLAINT REPORTING POLICY

PURPOSE

The purpose of the LADD Complaint Reporting Policy is to ensure LADD adheres to all laws, regulations, policies and procedures that apply to or have been adopted by the company. The policy will provide a method of reporting suspected violations, complaints and document appropriate corrective action. Management has the obligation to conduct a prompt, thorough, and impartial investigation into all reports.

SCOPE

This policy applies to all stakeholders including employees, people supported, families, legal guardians, contract agencies and community members.

POLICY

It is the policy of LADD to promote a positive public image that aligns with the mission, vision and values of the company. If any employee or stakeholder reasonably believes that some policy, procedure, best practice, or activity of LADD is not being followed or is in violation of the law, regulation or contract standard a method to report is made available. All reports will be thoroughly investigated, without bias and immediate corrective action will be taken.

STANDARDS AND DEFINITIONS

*****Any complaints that involve fraud, waste, abuse or violations of confidentiality must be reported immediately to the CCO*****

*****Any complaint that involves harassment, retaliation or violence must be reported immediately to the CCO*****

There are several methods to report suspected violations or complaints;

- The LADD Directory – contains the Complaint Form as part of the Compliance and Ethics Program. The LADD Directory is located online.
- Staff Communication Log–contains the Complaint Form in the Postings Section.
- Suggestion Box – located on line and at the company offices.
- Email the Corporate Compliance Officer – email address listed on line and on the Emergency Procedure Responsible Person List at corporatecompliance@laddinc.net
- Call the Corporate Compliance Officer – telephone number available on line and listed on the Emergency Procedure Responsible Person List.
- Call the anonymous hotline and leave a message – telephone number available on line; toll free.
- LADD Privacy Practices – telephone number and address for contacting the Corporate Compliance Officer listed.
- Face to face meeting with a member of Management, Human Resource Director and/or Corporate Compliance Officer– unannounced meetings will be accommodated in most circumstances.
- Call a member of Management – Use the Emergency Procedure Responsible Person List to access the correct number to call.
- New Hire and Annual Training – includes contact information for contacting the Corporate Compliance Officer by toll free number phone, fax or email.
- Complaint Form – the Complaint Form is available on line and in service locations as well as on the people supported website.

A suspected violation, complaint or report is referred to as informal or formal based on the following standard;

- **Informal Complaints** - are generally complaints that are resolved by informal discussions where questions/concerns are raised, policy/procedure is referenced and education and training take place.
- **Formal Complaints** - are made in writing using the LADD Complaint Reporting Form. A person supported may request staff or management to assist them with writing the complaint for them if necessary. This requirement is not meant to limit the ability of a person to make a Formal Complaint but is required so that sufficient detail is available to process the complaint. Formal Complaints should include relevant details, evidence and verifiable facts to support the complaint. It is the inclusion of this level of detail that further serves to differentiate an Informal Complaint from a Formal Complaint. All Formal Complaints will be routed to the CCO.

LADD is structured with 4 different Departments to assist employees and stakeholders; a Corporate Compliance/Business, Quality Assurance/Improvement, Services, and Human Resource Departments. Depending on the issue, more than one department may need to be involved to investigate and resolve the issue. In certain circumstances, it is possible to have a complaint from an employee or stakeholder such as person supported, guardian, family member reviewed by an external reviewer, outside of LADD. The Executive Director or their designee will determine this.

The LADD reporting system is designed with confidentiality and anonymity in mind. Every attempt will be made to assist people with reporting while maintaining confidentiality. This is a critical element of a robust reporting mechanism. However, due to the details of the report and investigative processes the identity of the person reporting may be able to be determined by others involved in the situation and is unavoidable.

In addition, all employees and individual stakeholders such as people supported, guardians and family members are provided with protection so that reports do not result in retaliation or barriers to service.

Routine testing of reporting mechanisms will occur to ensure they are functioning correctly and the Corporate Compliance Officer is receiving reports.

All stakeholders, including employees of LADD must immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD.

The Corporate Structure and Chain of Communication (following the Chain of Communication below is not a requirement for a compliance issue);

- Program Managers
- Area Supervisors
- Regional Directors
- Director of Operations and Development, Director of Human Resources, Director of Quality Improvement and Director of Business
- Executive Director/Board of Directors – The Corporate Compliance Officer has a direct reporting responsibility to the Executive Director and the Board.
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PROCEDURE

Reporting failure to follow company policy, procedure or best practice.

1. If an employee or other stakeholder becomes aware of a policy, procedure or practice they feel is not being followed they are expected and encouraged to report the problem or situation to Management via one of the methods specified in the Definitions and Standards section of this policy as an Informal Complaint.
2. In these circumstances it is beneficial for the person reporting, together with Management, to address the Informal Complaint directly since they may be closest to the issue and therefore in the best position to make immediate

corrections. The Mission, Vision and Values is an excellent tool to use in addressing issues since all employees and stakeholders are provided with a copy and expected to align their behavior accordingly. Regardless, all employees are still required to follow reporting requirements as trained i.e. Incident Reports.

3. It is **NOT** the intent of this procedure to limit or restrict reporting but to aid in the timely resolution of complaints. The person reporting may choose to report to any level of Management at any time including the CCO at their discretion using the method that is best for them i.e. telephone, email, text.
4. If it is not possible to address or resolve the Informal Complaint using this approach, then the person will use the chain of communication from the Standards and Definitions section of this policy to guide them to the next available level of Management to address their complaint.
5. If the Informal Complaint has not been resolved or addressed as agreed by the previous two steps a meeting with the person and a Department Director will occur to resolve the issue. The meeting will occur within five business days of the request by the person for a meeting.
6. Documentation of the meeting will be completed by the Department Director and include a summary of the complaint, any additional investigation and review of findings, including steps that will be taken to address the complaint. Documentation will be forwarded to the CCO and the findings will be communicated to the person within two business days of the meeting.
7. If the above steps fail to yield a resolution, the person may contact the CCO for assistance with resolving the complaint. If necessary the CCO, in conjunction with the Executive Director will determine if external review will take place. External review is the final step in an Informal Complaint. The person will then move to the Formal Complaint process. It is not necessary to begin the process as an Informal Complaint. Informal Complaints can be elevated to a Formal Complaint at any time by completing the Complaint Form and submitting it to the CCO.
8. If a person has a Formal Complaint the complaint will be forwarded to the CCO per the Standards and Definitions section of this policy for resolution.
9. The CCO will meet with the person within two business days of receiving the Formal Complaint.
10. Documentation of the meeting will be completed by the CCO and include a summary of the complaint, any additional investigation and review of findings, including steps that will be taken to address the complaint. The Notice of findings will be communicated to the person within two business days of the meeting.
11. If all above steps fail to yield a resolution, the CCO will assist the person to contact the Executive Director who will assist the person to contact the board for review and resolution if necessary.
12. If a conflict of interest is reported that involves the Corporate Compliance Officer, then the Executive Director/Board of Directors can approve an outside reviewer to investigate and report back to the Board of Directors.

Report of suspected violation of law, regulation or contract standard.

1. If a person suspects a violation of law, regulation or contract standard they are expected and encouraged to report the problem or situation to Management via one of the methods specified in the Definitions and Standards section of this policy as well as the appropriate regulatory authority.
2. It is the expectation of Management that all complaints received that are related to violation of law, regulation or contract standard are immediately reported to the CCO who will review with the Executive Director for further action. This may then be reported by a member of Management to the county's designated Recipient Rights Officer, Adult Protective Service, Local Authorities, or Licensing Consultant.

Reporting and grievances by the people supported – Management will assist the person as necessary and/or requested to find available advocacy services for assistance in the complaint process.

1. If a person supported has an Informal Complaint, they are encouraged to contact the Manager of the support services they receive. When the person supported addresses the complaint with the Manager, they are engaging the person in the best position to provide immediate assistance with their complaint.
2. If it is not possible to address or resolve the Informal Complaint using this approach then the person supported will receive assistance, if necessary, by any LADD employee to use the chain of communication from the

Standards and Definitions section of this policy to guide them to the next available level of Management to address their complaint.

3. If the Informal Complaint has not been resolved or addressed as agreed by the previous two steps a meeting with the person supported and a Department Director will occur to resolve the issue. The meeting will occur within five business days of the request by the person supported for a meeting.
4. Documentation of the meeting will be completed by the Department Director and include a summary of the complaint, any additional investigation and review of findings, including steps that will be taken to address the complaint. Documentation will be forwarded to the CCO and the findings will be communicated to the person supported within two business days of the meeting.
5. If all above steps fail to yield a resolution, the Department Director will assist the person supported to contact the CCO for assistance with resolving the complaint. If necessary the CCO, in conjunction with the Executive Director will determine if external review will take place. External review is the final step in an Informal Complaint. The person supported will then move to the Formal Complaint process. It is not necessary to begin the process as an Informal Complaint. Informal Complaints can be elevated to a Formal Complaint by completing the Complaint Form and submitting it to the CCO.
6. If a person supported has, a Formal Complaint the complaint will be forwarded to the CCO per the Standards and Definitions section of this policy for resolution.
7. The CCO will meet with the person supported within two business days of receiving the Formal Complaint.
8. Documentation of the meeting will be completed by the CCO and include a summary of the complaint, any additional investigation and review of findings, including steps that will be taken to address the complaint. The findings will be communicated to the person supported within two business days of the meeting.
9. If all above steps fail to yield a resolution, the CCO will assist the person supported to contact the Executive Director who will assist the person to contact the board for appeals, review and resolution.

The CCO will keep documentation of all Formal Complaints and complete an analysis as part of the Compliance Report to include the number of complaints received, trends, areas of possible improvement and action taken towards improvement.

IMPORTANT NOTE: Retaliation of any kind for reporting will not be tolerated and must be reported to the CCO immediately!

LADD
WE MAKE THE DIFFERENCE