

Great Rivers Behavioral Health Administrative Services Organization

Policy Title:	Complaint Resolution	Policy No. 9015.00
Category:	Employment Policy Manual	Date Adopted: 04/09/2021 Date Reviewed:
Reference:		

Purpose & Scope:

- 1.1. Great Rivers BH-ASO has established this policy to provide an effective process to address and resolve employee concerns or complaints regarding employment-related actions, decisions, or application of policies affecting an employee's work environment. This policy applies to all regular and project employees.

Process:

- 2.1. As much as reasonably possible, complaints regarding operational decisions not governed by Human Resources policies should be filed with the employee's unit supervisor or manager.
- 2.2. As much as reasonably possible, employees are expected to abide by the following guidelines when addressing employment and workplace concerns:
 - 2.2.1. Concerns over operational matters and decisions must be addressed to their unit's supervisor hierarchy;
 - 2.2.2. HIPAA and other clinical policy application concerns must be addressed to the Compliance Officer;
 - 2.2.3. Great Rivers BH-ASO's "Equal Opportunity Employment and Harassment" policy provides a complaint procedure for filing complaints regarding unlawful discrimination or harassment;
 - 2.2.4. Great Rivers BH-ASO's "Whistleblower Protection" policy provides a complaint procedure for filing complaints regarding improper governmental action by Great Rivers BH-ASO officers or employees.
 - 2.2.5. Any other concerns, or in circumstances deemed necessary, employees may bring concerns to the Human Resources representative.

Non-Retaliation:

- 3.1. Retaliation is prohibited against employees bringing forward complaints under this policy in good faith, as well as to any employee cooperating with or involved in the fact-gathering process or investigation.

Timeliness:

- 4.1. In order to address and resolve problems in a timely manner, notice of issues of concern and interests must be brought as soon as practicable to the attention of the direct supervisor, the unit's upper manager, the Human Resources representative, or the Chief Executive Director (CED), as applicable (see general guide). Great Rivers BH-ASO is committed to engaging in a resolution process promptly; the time to complete the fact-gathering and resolution process will be

determined by reasonable schedule availability and the extent or difficulty of the case, but with the goal of providing as timely as possible but thorough process.

Contents of Complaint:

- 5.1. To initiate a complaint resolution process, the complaint must be in writing and include the following:
 - 5.1.1. the actions or decisions challenged;
 - 5.1.2. the names of the individual(s) who caused the grieved action(s) or made the grieved decision(s);
 - 5.1.3. the names of any witnesses or means to corroborate information, if available or applicable;
 - 5.1.4. the policy or procedure not followed or challenged;
 - 5.1.5. the remedy recommended or requested;
 - 5.1.6. the employee's name, contact information, and signature.

Informal Resolution:

- 6.1. Employees are encouraged to resolve concerns informally, at the lowest level possible, such as amongst themselves or with the assistance of a 3rd party such as their supervisor, HR, or another employee to facilitate the discussion. Employees also may contact Human Resources to discuss issues or request information regarding interpretation and application of policies and procedures before deciding whether to attempt informal resolution or initiate the complaint resolution process described below. Employees are not required to seek informal resolution prior to initiating a complaint resolution process. This is only an encouragement to provide workplace relationships but not to replace the complaint resolution process. It is ultimately the decision of the employee, which process to pursue.

Initial Review:

- 7.1. Employees should provide a written complaint as soon as possible and practicable after becoming aware of the issues of concern. If circumstances justify not presenting a complaint to the employee's supervisor, the employee should contact the next level of management or Human Resources for assistance.

Complaint Review:

- 8.1. A response will be issued as soon as practicable following receipt of the report and the completion of a fact-gathering or investigation process. An employee not satisfied with the initial response may request a review by the next supervisory or management level by filing a request within five (5) working days. The request for review should include the reasons the employee is not satisfied with the initial response and the desired resolution. A response will be issued as soon as practicable upon the receipt, review, and completion of any necessary or additional fact-finding.
- 8.2. An employee not satisfied with the senior management response may request further review by the Human Resources representative who will bring and discuss it with the CED. The request for further review should include the reasons the employee is not satisfied with the prior response(s) and the resolution desired. The Human Resources representative, or designee, will respond as soon as practicable.
- 8.3. If any issue submitted for review under this policy becomes subject to litigation, Great Rivers BH-ASO will determine the appropriateness of continuing the review process.
- 8.4. Whenever appropriate, Great Rivers BH-ASO may elect to utilize alternative conflict resolution tools such as:
 - 8.4.1. Internal peer-review or mediation;
 - 8.4.2. Contract with outside mediation services;

8.4.3. Contract with outside fact-gathering or investigation services;

8.4.4. Non-binding arbitration

8.5. Great Rivers BH-ASO expects all employees to cooperate, participate, and engage in the conflict resolution process the organization deems appropriate to address each specific case.

Terminated Employees:

- 9.1. The Great Rivers BH-ASO HR Representative will offer an invitation to all departing employees, regardless of the reason for termination of employment, to participate in an "exit interview". Employees terminating employment may use this process to voice any concerns to the HR representative, who will review and conduct any necessary inquiries or fact-gathering and report to the CED any identified issues of concern.
- 9.2. Employees terminating employment may have their termination action reviewed under this policy by filing a written complaint with the Great Rivers BH-ASO CED postmarked within ten (10) calendar days of notice of their termination. The written complaint should include:
 - 9.2.1. A description of the relevant facts, to include persons involved or witnesses, if appropriate;
 - 9.2.2. The reasons the individual disagrees with the termination decision;
 - 9.2.3. The remedy recommended or requested;
 - 9.2.4. The employee's name, address, phone number, and signature.
- 9.3. The CED will provide a written response as soon as practicable following receipt and review of the report and the completion of a fact-gathering.

POLICY SIGNATURE

DocuSigned by:
Vickie L. Raines
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Vickie Raines, Chair
Great Rivers BH-ASO Governing Board

4/9/2021

Date