



"Empowering People. Building Communities."

**Partnership for Families, Children and Adults, Inc.
1800 McCallie Ave.
Chattanooga, TN 37404**

**Title VI Implementation Plan
2020-2021**

Approved by:

A handwritten signature in black ink that reads "Pam Ladd".

Pam Ladd, Chief Executive Officer

Date:

August 5, 2020

Approved by the Board of Directors
August 5, 2020

Partnership for Families, Children and Adults, Inc.

Title VI Implementation Plan

Table of Contents

	Page
I. Introduction (Statute, Authorities and Organization)	3
II. Organization/Civil Rights Coordinator	4
III. Public Notification and Engagement	5
IV. Complaint Procedures	5
V. Exhibits	5
VI. Compliance Review and Reporting	6
VII. Minority Representation and Participation	6
VIII. Census Demographics	6
IX. Goals and Objectives	7

I. Introduction (Statute, Authorities and Organization)

Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It provides that *"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance."* Tennessee Code Annotated § 4-21-904 prohibits discrimination on the basis of race, color, or national origin, by any state agency receiving federal funds, or by any person receiving Federal funds from such an agency, and prohibits any such person from excluding any person from participation in or denying benefits to a person or subjecting a person to discrimination under any program or activity receiving such funds. As President John F. Kennedy said in 1963:

"Simple justice requires that public funds, to which all taxpayers of all races [colors, and national origins] contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial [color or national origin] discrimination."

In compliance with Title VI and TCA § 4-21-904, the Partnership for Families, Children and Adults, Inc. will not engage in intentional discrimination, and will not permit a pattern or practice of such discrimination. The Partnership will not permit policies or practices that have the effect of discriminating against recipients on the basis of race, color, national origin or any other classification protected by Federal, Tennessee State Constitutional and/or Statutory Law.

Specifically, the Partnership will not:

- Deny any person service, assistance or other benefit for which they are qualified;
- Provide any person with service different from that provided to others under the same program;
- Subject any person to separate treatment in any manner related to services, aid or other benefits, and will provide a plan to assist those with Limited English Proficiency (LEP);
- Limit any person in any way in the use of services, facilities, or any other advantages, privileges, or benefits provided under the same program;
- Treat any person differently from others in deciding eligibility for services;
- Deny any person or offer an opportunity different from that offered others in any program or service;
- Adopt methods that limit participation by any group of recipients or subject them to discrimination, and
- Refer any person to agencies that are known not to obey civil rights laws.

The Partnership for Families, Children and Adults, Inc. is a comprehensive social services agency that has been serving people in the Tennessee Valley for over 140 years. The Partnership is the oldest and largest social service agency in the region with 12 programs - all dedicated to *"Empowering people. Building communities."*

Programs and services include:

- Stability Support Services
 - Building Stable Lives
 - Community Based Case Management
 - Transitional Housing
 - River City Youth Collective
 - Retired Seniors Volunteer Program

- Victim Support Services
 - Elder and Disabled Abuse services
 - Emergency Shelter for Families
 - Family Violence Center
 - Rape Crisis Center
 - Supervised Visitation

- Elder Support Services
 - Community Based Case Management
 - Homecare Program
 - Long Term Care Ombudsman

- Deaf, Deaf-Blind, and Hard of Hearing Services
 - American Sign Language Classes
 - Community Based Case Management
 - Community Center
 - Interpreting Services

- Sustainability Services
 - Deaf Services Interpreting
 - Cause Cloth Thrift & Boutique Shop

The Partnership is accredited by the Council on Accreditation of Services for Families and Children, Inc. (COA) and the National Foundation for Credit Counseling (NFCC) and actively participates in the Alliance for Children and Families and the Tennessee Conference on Social Welfare (TCSW).

II. Organization/Civil Rights Coordinator

The Board of Directors of the organization as the constituted authority of the agency is responsible for adopting all policies to govern personnel practices and conditions of employment for all personnel of the agency. The Executive Committee of the Board, the Chief Executive Officer and the Human Resources department are charged with the responsibility of maintaining and developing appropriate personnel policies and practices to be followed in matters related to personnel administration. The Board Executive Committee may hear recommendations from the Staff Committee, which is composed of representatives from the agency staff, but are not required to act on any recommendation submitted by the Staff Committee. The Executive Committee reviews and makes any appropriate recommendations or policy changes to the Board.

The Partnership of Families, Children and Adults designates the Chief Executive Officer as its Civil Rights Coordinator. The Civil Rights Coordinator is designated to receive complaints of discrimination, will delegate investigatory responsibility to a designee, and will report to the Executive Committee and the Board of Directors periodically, and on an as needed basis concerning the status of any complaints of discrimination on the basis of race, color, or national origin as well as the resolution of problems or complaints. The Coordinator's designee will record and log complaints of discrimination. The Coordinator will report to the Board annually concerning the registry or log of such complaints and will annually review the Implementation Plan and report on suggested revisions or changes in the plan. The Board of Directors will adopt the Implementation Plan and report on suggested revisions or changes in the plan. The Board of Directors will revise and amend the plan as appropriate.

Civil Rights Coordinator: Pam Ladd, Chief Executive Officer
1800 McCallie Avenue (423) 697-3813

Title VI Coordinator: Pam Ladd, Chief Executive Officer
1800 McCallie Avenue (423) 697-3813

III. Public Notification and Engagement

The Partnership for Families, Children and Adults, Inc., through its Implementation Plan provides for compliance with Title VI. The Partnership will make its Title VI Implementation Plan and complaint form available on its website and will make copies of the plan available at its business office during regular hours. The Partnership will periodically publish statements concerning Title VI in materials available to the public and to prospective beneficiaries.

The Partnership will periodically include a summary of the Title VI legal requirements in its publications or information on its website. The Partnership will develop a plan to assist and provide access to alternative language copies of marketing publications prepared for PFCA upon request and will provide translation services on an as needed basis.

The Partnership is a nonprofit corporation. The Human Resources department will provide introductory orientation, to include, awareness, sensitivity, and objectivity when carrying out services, and will oversee periodic training to staff on the Title VI Implementation Plan and on the Partnership's commitment to diversity and prohibition on discrimination. Staff members directly responsible for implementation of the Title VI Implementation Plan will receive additional training. This training will be incorporated into the regular staff training and professional development plan which is reviewed and updated annually.

IV. Complaint Procedures

The Partnership for Families, Children and Adults, Inc. has established policies and procedures to address all complaints to ensure compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987 and the Americans with Disabilities Act of 1990. See attached policies and procedures listed under section V. Exhibits. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. This option is posted for public knowledge. Every effort is made to resolve complaints informally if possible.

V. Exhibits

Exhibit	A	HR-1940	Title VI Policy and Procedures
Exhibit	B	HR-670	Grievance Policy and Procedures (Employee)
Exhibit	C	HR-670-F	Grievance Form (Employee)
Exhibit	D	HR-670-F1	Notification of Resolution Form (Employee)
Exhibit	E	HR-340	Discrimination Prohibition Policy and Procedure
Exhibit	F	CR-250	Client Rights & Responsibilities Policy and Procedures
Exhibit	G	CR-250-F-E	Client Rights & Responsibilities Form (English)
Exhibit	H	CR-250-F-S	Client Rights & Responsibilities Form (Spanish)
Exhibit	I	CR-270	Complaints, Grievances & Appeals Policy and Procedures (Client)
Exhibit	J	CR-270-F-E	Complaint and Grievance Form (English) (Client)
Exhibit	K	CR-270-F-S	Complaint and Grievance Form (Spanish) (Client)
Exhibit	L	CR-270-F1	Notice of Resolution Form (Client)

VI. Compliance Review and Reporting

The Civil Rights Coordinator's designee will maintain a confidential log and record of any complaints alleging discrimination on the basis of race, color, national origin or any other classification protected by Federal, Tennessee State Constitutional and/or Statutory Law. In the event the Partnership provides grants, aid or financial assistance, the Partnership will expect and require the recipient to provide written assurance of its compliance with Title VI. The Partnership will collect and report data on minority representation for its board and for participants in its scope of operations and programs. The Partnership may collect self reported data concerning participation as Partnership board members, committee members, survey participants for community marketing projects, or attendees for Partnership events, and will compare data concerning participation with census data for this community and will implement steps to correct under participation by racial and national origin minorities.

VII. Minority Representation and Participation

The Partnership will support and encourage minority representation, including minority designation by race, color, national origin, and gender, and participation on behalf of the agency. The Partnership will support and encourage diversity and participation on behalf of racial and ethnic origin minorities and women. The Partnership will encourage self reporting of minority participation in Partnership activities in order to track progress with regard to increasing minority participation and representation. The Partnership will consult with Human Resources concerning the need to increase minority representation in its workforce. The current workforce minority representation is as follows:

% Female	88%
% Male	12%
% Minority	41%
% Non-Minority	59%

VIII. Census Demographics

The following represents the beneficiary demographics (self-identified) of all Partnership programs and services for Fiscal Year 2019/2020:

White/Caucasian	59%
Black/African-American	31%
Latino/Hispanic	7%
Bi-Racial	1%
Asian	0%
Native American/American Indian	0%
Pacific Islander	1%
East Indian	0%
Unknown	1%
Total	100%

The following represents comparative demographics for Chattanooga and the State of Tennessee from the 2010 census report (U.S. Census Bureau):

Group in Percentage of Population	Chattanooga	Tennessee
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White	58%	78%
Black	35%	17%
American Indian/Alaska Native	0.4%	0.3%
Asian	2%	1.4%
Native Hawaiian/Other Pacific Islander	0.1%	0.1%
Two or more Races	1.9%	1.7%
Hispanic/Latino	5.5%	4.6%

IX. Goals and Objectives

- The Partnership will implement this compliance strategy and will periodically review this plan and revise this plan as may be needed.
- The Partnership will review minority participation and examine appropriate methods of encouraging minority hiring and promotion.
- The Partnership will review current marketing publications prepared for its stated purposes to ensure that they reflect compliance with Title VI.
- The Partnership will monitor the demographics of the workforce to ensure sufficient minority representation in compliance with Title VI.

Exhibit A

Partnership for Families, Children and Adults, Inc.

POLICY	TITLE VI		
Policy #	HR-1940	Originated:	04/04/08
Approved By	Board of Directors	Approved:	05/07/08;04/04/12 10/05/16; 08/05/20
Section	Human Resources	Reviewed/ Revised:	04/2008; 03/2012 09/2016; 07/17/20
Cross Ref #	CR-250	Deleted:	

POLICY

The Partnership for Families, Children and Adults, Inc. shall adhere to Title VI of the Civil Rights Act of 1964, which requires programs receiving Federal Financial Assistance ensure that no person in the United States shall, on the basis of race, color, national origin or any other classification protected by Federal, Tennessee State, Constitutional and/or Statutory Law, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving such assistance.

The Partnership states that courtesy titles (i.e. Mr., Mrs., Ms., Miss) shall be used by staff to address clients without regard to race, color, national origin in both oral and written communication.

The Partnership provides Limited English Proficiency (LEP) or translation/interpreting services where a minority population constitutes a minimum of 2% of the overall area population in order to enable all clients to have access to the services provided by the agency. Over-the-line interpreting services for all clients using crisis services shall be available.

APPROVAL

Board of Directors

PROCEDURE

RESPONSIBILITY

**Human Resources
designee**

1. Trains employees on Title VI policy and procedures as part of new employee orientation, and annually for those staff with direct client contact.

REFERENCES

Title VI, Civil Rights Act 1964
Agency brochures in English and Spanish translation

DEFINITIONS

**Forms
Attachments**

Exhibit B

PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.

Policy Title:	GRIEVANCE		Policy #: HR-670
Section:	HUMAN RESOURCES	Originated:	01/09/08
Approved by:	BOARD of DIRECTORS	Approved:	03/05/08; 04/04/12 04/03/19
Cross Ref #:		Reviewed:	02/11/08; 2012
		Revised:	03/2019
<u>POLICY</u>			
<p>The Partnership for Families, Children, and Adults, Inc. (PFCA) believes that its employees are the organization's most important resources. PFCA is committed to creating a work environment in which everyone's voice is heard, issues are promptly raised and resolved, and communication flows across all levels of the organization. Our goal is to treat each employee as an individual while developing a spirit of teamwork so individuals can work together to attain a common goal.</p> <p>Employees are encouraged to meet and discuss suggestions, problems, or concerns regarding employment related matters with management. In turn, careful consideration will be given to all legitimate employee concerns and responded to by PFCA's management in a fair and timely manner.</p> <p>PFCA's Commitment to Open Communication – Open Door Policy:</p> <ol style="list-style-type: none">a. Open, honest communication, trust, and mutual respect among directors, managers, supervisors, and employees are day-to-day business practices.b. Employees may seek advice, provide or solicit feedback, or raise concerns with the organization.c. PFCA objectively reviews its established procedures for considering decisions and complaints raised by PFCA employees, in order to ensure fairness and consistency.d. Management creates a work environment in which employees' input is welcome, and issues are surfaced early and are candidly shared without the fear of retaliation when input is shared in good faith. <p>All agency employees shall have access to this employee grievance procedure and none shall be subjected to retribution or sanction because they have attempted to use this process to resolve a problem or dispute.</p> <p>The following issues, however, are NOT subject to grievance:</p> <ol style="list-style-type: none">a. Establishment or revision of wages, salaries, position classification or general benefitsb. Contents of policies, procedures, rules and regulationsc. Termination, lay off, demotion or suspension from duties due to lack of work, loss of grant, reduction in workforce or job abolitiond. Suspension with pay, pending investigatione. Actions by the agency's Board of Directorsf. Requirements of licensure or accreditation standards.			
<u>PROCEDURE</u>			
A. Informal Conflict Resolution and Complaint Process			

Responsibility	Process
Employee (Grievant)	An employee who has a job-related problem, question, or complaint, should first attempt to discuss the matter with the person involved, as appropriate. When this is not appropriate, or no satisfactory outcome is reached, the grievant should contact his/her immediate supervisor. The simplest, quickest, and most satisfactory solution is often reached at one of these two levels. In some situations, this may be difficult or inappropriate. In these cases, the employee may request a meeting with the next level of management or with HR, as appropriate, to discuss the problem. HR is to be used in instances where it would not be appropriate to bring up the issue to either a direct supervisor, or their direct supervisor. The initial concern must be raised within ten (10) working days of the employee (grievant) becoming aware of the situation of concern.
Immediate Supervisor, Next Level Management, or HR	Analyze the merits of the conflict resolution request or complaint, and within five (5) working days of receipt of the complaint, meet with the employee to inform the employee of the proposed plan of action.
Employee (Grievant)	If a satisfactory solution is not reached, employee may proceed informally to the next level of management or proceed with the formal problem resolution process; this must be done within seven (7) working days of the recommended plan of action.

B. Formal Conflict Resolution and Complaint Process

Responsibility	Process
Employee (Grievant)	Complete the employee grievance form and prepare written documentation with supporting details of the conflict situation or complaint/grievance and submit it to their direct supervisor, next level supervisor in that department, or HR (as appropriate) for review. The program director must be copied if not already involved as supervisor or next level supervisor.
Immediate Supervisor, Next Level Management, or HR	Schedule an appointment to meet with the employee (grievant) within five (5) working days of receiving the formal grievance. After reviewing all the information and meeting with the grievant, management will have five (5) working days to respond to the grievance in writing in an effort to come to a mutual agreement. If one is reached, the file will be sealed and sent to HR for filing, along with a completed "conflict resolution" form. The grievance form and conflict resolution form must also be forwarded to the Director of Quality.
Employee (Grievant)	If unsatisfied with the results, the grievant has the option to appeal to senior management (HR, CEO, or CEO designee as appropriate, following the same chain of command as before). Grievant may only appeal once per individual incident filed and must copy all three senior management staff unless one of the individuals is involved in the grievance, submitting all paperwork related to the case and stating:

	<ul style="list-style-type: none"> a. The specific nature of the grievance b. Mutual, but unsatisfactory, efforts at resolution c. The specific satisfaction requested
HR and/or CEO	<p>Must review all materials sent by grievant, as well as discuss the situation with next level down involved in previous decision. Within ten (10) working days of the appeal, upper management must communicate with the grievant in writing with a final decision and recommendations.</p> <p>Senior management will then seal the files and forward them to HR for filing along with the conflict resolution form. The grievance form and the conflict resolution form should also be forwarded to the Director of Quality.</p>
Employee Supervisor Program Supervisor or Program Director Human Resources	Ensures that staff is trained and familiar with policy and procedures.
REFERENCES	COA 8 th Edition HR 4
DEFINITIONS	
FORMS	HR-670-F Employee Grievance Form HR-670-F1 Employee Grievance Resolution Form
ATTACHMENTS	

Exhibit C

PARTNERSHIP FOR FAMILIES, CHILDREN, AND ADULTS, INC. Employee Complaint/Grievance Form

Employee Making Complaint: _____ Direct Supervisor: _____

PFCA Department: _____ Job Title: _____

Witnesses: _____

Involved Individuals: _____

Describe in detail the nature of your complaint, efforts made to resolve the issue informally, and any documented proof.

Please give details regarding how the incident has affected your ability to work effectively:

What actions could the PFCA take in order to effectively deal with your complaint?

Signature of Person Making Complaint

Date

Do not write below this line

AGENCY FOLLOW-UP

Supervisor/Director/HR responsible for follow up: _____

Date staff reached out to employee to set a date to meet: _____

Date set to meet with employee: _____

Discussion, possible solutions, recommendations:

--

Signature of Reviewer: _____

Date: _____

Follow up	By Whom	Date Initiated	Date Completed

(Attach additional documentation as needed)

Does the complainant wish to appeal final decision/action of the grievance? Yes No

If yes, provide the CEO or CEO Designee with all pertinent information within 24 hours. The CEO will make the final determination on the appeal according to the timelines set forth by Partnership's employee grievance policy.

Exhibit D

***PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.
Employee Grievance – Notification of Resolution (HR-670-F1)***

Date Grievance Received: _____ Date: _____

Complainant: _____ Respondent: _____

Assigned Program: _____ Work Site: _____

State the complainant’s grievance in brief; but detailed terms (*attach additional documentation if necessary*):

TO BE COMPLETED AT THE PROGRAM LEVEL OR HIGHEST LEVEL OF RESOLUTION:

Was agency policy and procedure followed? ___ Yes ___ No If No, explain: _____

Were established timelines met? ___ Yes ___ No If No, explain: _____

Outline follow-up and eventual solution reached (*attach additional documentation if necessary*):

I have been advised of my right to appeal and prohibition against retaliation. ___ Yes ___ No

My signature affixed below signifies that I have received a copy of this notification of resolution and accept its outcome:

Complainant

Date

Witness

Date

CC: Program Director
Human Resources
PQI Coordinator
Employee Personnel File

HR-670-F1 Employee Grievance Notification of Resolution Form (Reviewed 2019)

Exhibit E

Partnership for Families, Children and Adults, Inc.

POLICY	DISCRIMINATION PROHIBITION		
Policy #	HR-340	Originated:	01/09/08
Approved By	BOARD OF DIRECTORS	Approved:	03/05/08; 04/04/12 10/05/16
Section	HUMAN RESOURCES	Reviewed/Revised:	02/11/08; 03/2012 08/19/15; 09/2016; 10/2019
Cross Ref #	ETH-1580 (& Attachments): Protection from Retaliation	Deleted:	

POLICY Partnership for Families, Children and Adults, Inc., in accordance with applicable laws, prohibits discrimination when recruiting, selecting or hiring employees. Partnership policies, procedures and practices are designed and implemented to prohibit discrimination on the basis of race, color, religion, gender, perceived or actual sexual orientation, gender identity or gender expression, national origin, age, disability, marital status, status as a covered veteran, genetic information, or any other protected class in accordance with applicable state and local laws governing non-discrimination in employment.

Any employee found to be engaging in any type of unlawful discrimination will be subject to disciplinary action up to and including termination.

The Partnership shall provide employment opportunities for applicants with disabilities and shall make reasonable accommodation(s) to meet the physical or mental limitations of qualified applicants or employees.

A memorandum on “Equal Employment Opportunity” shall be posted at each Partnership service location.

This policy applies to all terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training.

APPROVAL PROCEDURE

Board of Directors

Employee

Any employee who feels that he or she is a victim of discrimination by any supervisor, management official, co-worker, client or vendor or any other person connected with the Partnership should bring the matter to the immediate attention of a supervisor, program manager or Human Resources.

Supervisor, Program Manager

Once notified that a violation of this policy has been alleged, immediately advises Human Resources or the CEO of this

information so that an investigation can be conducted.

Human Resources, CEO or Designee

Investigates and documents allegations of discrimination, describing the alleged event, date, time and location, and any witnesses to the incident. Complaints will be treated in a confidential manner to the extent possible. Because of the seriousness of this type of allegation, the Partnership will also discipline employees who purposely file a false complaint for the purpose of harming another employee.

Human Resources

Ensures that staff is trained and familiar with this policy and procedures.

REFERENCES

COA 8th Edition, HR1
Applicable laws include Title VII of Civil Rights Act of 1964, Americans with Disabilities Act (ADA), Age Discrimination in Employment Act (ADEA), Equal Pay Act of 1963 and Tennessee State Law

**DEFINITIONS
FORMS
ATTACHMENTS**

NA

Exhibit F

PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.

Policy Title:	CLIENT RIGHTS		Policy #: CR-250
Section:	CLIENT RIGHTS	Originated:	
Approved by:	Board of Directors	Approved:	03/05/08; 04/04/12; 08/03/16; 06/05/19
Cross Ref #:	CR-12 & CR-270	Reviewed:	01/15/08;02/2008; 03/2012; 03/2016; 06/14/16;07/15/16
		Revised:	05/17/19

<u>POLICY</u>
<p>The Partnership for Families, Children and Adults assures the basic human rights to all clients. These rights include: the right to dignity, privacy, humane care, freedom from mental and physical abuse, neglect, and exploitation. Each client shall receive, in accordance with client's rights, an individualized written service plan designed to maximize the development or restoration of client's capabilities. This policy is implemented through the provision of the following rights:</p> <ul style="list-style-type: none"> • The right to be free from discrimination for any reason, including race, color, creed, sex, gender identity, national origin, sexual orientation, age, disability, veteran status or religion. • The right to expect the highest professional standards of practice and treatment from all Partnership staff. • The right to be treated with dignity and respect, and to be free from unwarranted invasion of privacy. • The right to be informed of any fees for services, in writing and either prior to, or at the time of service. • The right to an individualized plan of service designed to meet client's specific needs. • The right to be actively involved in the development of the service or treatment plan. • The right to be informed about all the services provided and to have questions answered in understandable terms. • The right to privacy and confidentiality of personal information and services received, within the limits of the law and the agency's policies regarding privacy and confidentiality. EXCEPTIONS include: medical emergencies, threats of serious bodily harm to self or others, suspected child abuse or neglect, and suspected abuse of the elderly. • The right to confidentiality of all client records. No confidential information shall be released or obtained without the informed written consent of the client AND/OR legal guardian, EXCEPT as permitted by law and interpreted by the agency's legal counsel. • The right to be free from physical, mental and/or sexual harassment or abuse. • The right to access their own case record for the purpose of review, correction or addition, as defined by the agency's policy regarding access to records. • The right to be counseled in private and in an environment that is equipped and maintained to protect health and safety. • The right to have complaints and grievances heard and responded to in a timely manner and without retribution.

- The right, except when limited by law or court order, to consent, or to refuse services or treatment, and to be informed of the potential consequences of such refusal. Consent may be withdrawn at any time.
- The right to refuse any research activities considered outside the routine plan of service, except when agreed to with informed, written consent of the client and/or legal guardian.
- The right to refuse participation in any filmed or taped presentation, except when agreed to with the informed, written consent of the client AND/OR legal guardian.
- The right to refuse, without fear of reprisal, making public statements of gratitude to the agency or participating in promotional and/or fundraising activities.

PROCEDURE

Responsibility	Step	Process
Human Resources	•	Ensures that training on this policy and procedure is provided, annually, to all staff and to new staff, during the orientation process.
Program Manager or designee	•	Ensures that client rights are posted prominently in each program or service area.
	•	Ensures that, prior to, or at the time of intake each client is advised in writing of the above rights.
	•	Ensures that special accommodations are offered, and provided when requested for non-English speaking clients, and the visually or hearing impaired.
	•	Monitors staff compliance with agency policy on client rights.
All Staff	•	Comply with agency policy on client rights.
	•	Ensure that each client is advised in writing of the above rights, prior to or at the time of intake.
	•	Document in client's case record that Client Rights have been explained and any necessary accommodations made to ensure understanding.
	•	Report any suspected or observed violation of client rights to the next level of supervision which is not involved in the suspected violation.
REFERENCES	COA 8 th Edition, CR 1	
DEFINITIONS		
FORMS	<i>Client Rights and Responsibility Form:</i> <i>CR-250-F-E (English)</i> <i>CR-250-F-S (Spanish)</i>	
ATTACHMENTS		

Exhibit G

PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.

CLIENT RIGHTS AND RESPONSIBILITIES (CR-250-FE)

Welcome to the Partnership for Families, Children and Adults, Inc. We are committed to providing quality services designed to enhance, strengthen and support individuals, couples and families. We strive to offer an atmosphere of respect and dignity for each of our customers. Following is an outline of your rights and responsibilities as a Partnership client:

Client rights

- The right to be free from discrimination for any reason, including race, color, creed, gender, national origin, sexual orientation, age, disability, veteran status or religion.
- The right to expect the highest professional standards of practice and treatment from all Partnership staff.
- The right to be treated with dignity and respect, and free from unwarranted invasion of privacy.
- The right to be informed in writing prior to or at the time of service delivery of any fees for services.
- The right to an individualized plan of service designed to meet your specific needs.
- The right to be actively involved in the development of your service or treatment plan.
- The right to be informed about all the services provided to you and to have questions answered in terms you can easily and completely understand.
- The right to privacy and confidentiality of personal information and the services received, within the limits of the law and the agency's Privacy and Confidentiality policy. Exceptions include medical emergencies, threats of serious bodily harm to self or others, suspected child abuse or neglect, and suspected abuse of the elderly.
- The right to confidentiality of all client records. No confidential information may be released or obtained without your informed written consent, except as permitted by law and interpreted by the agency's legal counsel.
- The right to be free from physical, mental and/or sexual harassment or abuse.
- The right to access your case records for the purpose of review, correction or addition, as defined by the agency's policy on access to records.
- The right to be counseled in a private setting and in an environment equipped and maintained to protect health and safety.
- The right to have complaints and grievances heard and responded to in a timely manner, and without fear of retribution.
- The right to consent or refuse services or treatment, unless these rights have been limited by law or court order, and to be informed of the potential consequences of such refusal. Consent may be withdrawn at any time.
- The right not to be subjected to any research activities considered to be outside of the routine service plan, without your informed written consent.
- The right not to be filmed or taped without your informed written consent.
- The right, without fear of reprisal, to refuse to make public statements of gratitude to the

agency or to participate in promotional and/or fundraising activities.

Client responsibilities

- To treat other clients and staff of this agency with respect and courtesy
- To protect the confidentiality of other clients you encounter at this agency.
- To participate, as much as you are able, to create a plan for case management as applicable.
- To let your case manager/life coach, counselor know any concerns you have about your case management plan or changes in your needs.
- To make and keep appointments to the best of your ability, or if possible, to call to cancel or change an appointment time.
- To stay in communication with your case manager/life coach/counselor by informing him/her of changes in your address or phone number and responding to the case manager/life coach/counselor’s calls or letters to the best of your ability.
- To not subject agency case managers, staff, or other clients to physical, sexual, verbal, and/or emotional abuse or threats.

I understand these policies and agree to abide by them. I have had the opportunity to address any questions or concerns to my satisfaction and consent to the services offered.

_____	_____
Client Signature	Date
_____	_____
Witness Signature	Date

Exhibit H

PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.

Los derechos y responsabilidades del cliente (CR-250-FS)

Bienvenido a Partnership for Families, Children and Adults, Inc. En Partnership FCA nos comprometemos a proveer servicios de calidad diseñados para mejorar, hacer más fuertes, y apoyar a individuos, parejas y familias. Nos esforzamos por ofrecer una atmósfera de respeto y dignidad para cada uno de nuestros clientes. Los siguientes son sus derechos y responsabilidades como cliente de Partnership.

- El derecho de no ser discriminado por ninguna razón, incluyendo raza, color, credo, sexo, origen nacional, orientación sexual percibida o real, identidad o expresión de género, edad, estado civil, minusvalía, estatus de veterano, o religión.
- El derecho de esperar los estándares de profesionalismo más altos en cuanto a práctica y tratamiento por parte de todos los empleados de Partnership.
- El derecho de ser tratado con respeto y dignidad, y sin una invasión de intimidad injustificada.
- El derecho de ser informado por escrito del coste de servicios antes o en el momento de recibir dichos servicios.
- El derecho a un plan de servicio individualizado a mis necesidades específicas.
- El derecho de estar envuelto activamente en el desarrollo de mi plan de tratamiento.
- El derecho de que se me informe de todos los servicios a recibir y de que se me conteste cualquier pregunta que tenga en términos que pueda entender.
- El derecho a la intimidad y confidencialidad de mi información personal y los servicios recibidos, dentro de los límites de la ley y según la declaración de principios de intimidad y confidencialidad de la agencia. Excepciones incluyen emergencias médicas, amenazas de daños serios a la persona o a otros, sospechas de abuso o negligencia contra niños, y sospechas de abuso a ancianos.
- El derecho a la confidencialidad de todos los ficheros del paciente. No se dará ni se obtendrá ninguna información confidencial sin mi consentimiento informado y por escrito, excepto en situaciones permitidas por la ley interpretada por el asesor legal de la agencia.
- El derecho de no ser sometido a ningún abuso o acoso físico, mental o sexual.
- El derecho de acceder mi record con el propósito de revisar, corregir o añadir información, siempre que sea en concordancia con la guía de acceso a información de la agencia.
- El derecho de ver a un consejero en privado y en un ambiente equipado y mantenido para proteger la salud y seguridad de las personas.
- El derecho de que se me escuche si tengo alguna queja y se me responda dentro de un tiempo oportuno, y sin miedo a represalias.
- El derecho a consentir o rechazar servicios o tratamiento, al no ser que este derecho haya sido limitado por la ley o una orden de la corte, y de ser informado de las posibles consecuencias si me niego al tratamiento. Yo puedo retirar mi consentimiento en cualquier momento.
- El derecho de no ser un sujeto en actividades de investigación que estén consideradas fuera de la rutina de mi plan de servicio, sin primero conseguir mi permiso por escrito.
- El derecho de no ser grabado en video ni en cinta sin mi permiso por escrito.
- El derecho de que no se me requiera ni se me anime a hacer una declaración pública de agradecimiento a la agencia, o de participar en actividades promocionales o recaudadoras de fondos, sin miedo a represalias.

Yo entiendo estos derechos y estoy de acuerdo con atenderme a ellos. He tenido la oportunidad de hacer preguntas y de recibir respuestas de forma satisfactoria y doy mi consentimiento a los servicios ofrecidos.

Firma del cliente

Fecha

Firma del testigo

Fecha

Exhibit I

PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.

Policy Title:	COMPLAINTS, GRIEVANCES, AND APPEALS		Policy #: CR-270
Section:	CLIENT RIGHTS	Originated:	3/2007
Approved by:	Board of Directors	Approved:	08/01/07; 04/04/12 08/03/16; 6/5/19
Cross Ref #:	CR-250	Reviewed:	05/30/07; 02/2012 03/2016; 06/14/16 07/15/16; 03/05/19
		Revised:	05/17/19
<u>POLICY</u>			
<p>All clients of the Partnership, including applicants for service, their families, and their guardians have the right to complain if dissatisfied with decisions concerning them, or if services provided to them are considered unsatisfactory. Circumstances which may precipitate complaints include, but are not limited to:</p> <ul style="list-style-type: none"> • Denial of the right to apply for services • Reduction or termination of services • Failure to act upon a request for services • Policies or regulations considered unfair or unreasonable • Discriminatory treatment or practices on the basis of race, color, sex, sexual orientation, gender identity, age, national origin, disability, or any other classification protected by Federal, Tennessee State Constitutional and/or Statutory Law. <p>Written procedures for expressing and resolving complaints are given to all applicants for service at the time of application and are made available at all Partnership locations accessed by the public, including the agency website. The written procedure includes a copy of the Complaint/Grievance Form, and steps to take in filing a grievance.</p> <p>Written procedures are also provided at the time a complaint occurs.</p> <p>Any staff or volunteer against whom a complaint/grievance has been filed is entitled to participate in the investigation process.</p>			
<u>PROCEDURE</u>			
Responsibility	Step	Process	
		IN RESPONSE TO COMPLAINTS	
Agency Staff	1.	Give prompt and careful attention to the complaint.	
	2.	Offer to arrange a meeting with the appropriate case manager or supervisor, including staff against whom complaint is lodged (Timeframe: 3 working days).	
	3.	Provide complainant with the written procedure for lodging complaints/grievances.	
	4.	Record facts of complaint in the case record, and include: <ul style="list-style-type: none"> • Name of complainant • Relationship to client, if not the client • Details regarding the issue • The facts, and the applicable policies • Efforts to resolve the complaints • Conclusion. 	

Supervisor or Designee	5.	Assure corrective action, when indicated, is completed within 3 working days from the time a decision is reached.
	6.	Inform complainant of resolution in writing.
	7.	Retain a copy of the notification of resolution in the case record.
		GRIEVANCE PROCESS – if complaint remains unresolved
Agency Staff	8.	Offer to assist complainant in filing a grievance
	9.	Provide the written procedure for lodging complaints/grievances (<i>Got a Problem or Complaint? Handbook</i>). Grievance routing: <ul style="list-style-type: none"> • Original – appropriate Program Director or Manager • Copy – CEO or designee
Program Director, Manager or designee	10.	Investigate the grievance.
	11.	Offer the grievant a meeting to discuss the grievance.
	12.	Provide a written response to the grievance within 5 working days. <ul style="list-style-type: none"> • Recommend a course of action to correct the grievance, OR • Ask for more information from all of the people involved, OR • Decide that no action is required. Written response routing: <ul style="list-style-type: none"> • Original - To the grievant • Copies - Case Record, CEO or designee
		APPEAL PROCESS – if grievance remains unresolved
CEO or designee	13.	Schedule a hearing within 10 working days of the request for appeal.
	14.	Render decision based on the oral/and or written evidence, testimony, and exhibits introduced in connection with the hearing.
	15.	Notify grievant in writing within 5 days of the date of action taken. Written response routing: <ul style="list-style-type: none"> • Original - To the grievant • Copy - Case Record. <i>If a grievance relates to a program funded through contract with other agencies, such as the Department of Children's Services, refer grievant to the appropriate agency to appeal through their grievance procedures.</i>
PQI Committee	16.	Review grievances and appeals quarterly.
	17.	Recommend appropriate corrective action and/or policy revision.
	18.	Prepare report on grievances and appeals, and actions taken in response, for quarterly review by the Chief Executive Officer and the Board.
REFERENCES		COA 8 th Edition CR 3, RPM 2.02 Department of Children's Services Policy and Procedure Manual (6/2006)
DEFINITIONS		Complaint - Expression of discontent or dissatisfaction. Grievance - A serious complaint that is not resolved to the complainant's satisfaction. Appeal - Resort to a higher authority for the purpose of obtaining a review of a decision, and/or a reversal of judgment.
FORMS		<i>Got a Problem or Complaint?</i> Handbook for customers (English and Spanish) Complaint/Grievance Form CR-270-F-E (English) & CR-270-F-S (Spanish) CR-270-F-1 Notification of Resolution
ATTACHMENTS		

Exhibit J

PARTNERSHIP FOR FAMILIES, CHILDREN, AND ADULTS, INC. Complaint/Grievance Form (CR-270-FE)

Name of Person Making Complaint: _____ Date: _____
Statement of Complaint: (use back of form if necessary)

May we contact you for further information? Yes No. If yes, please provide contact information:

Signature of Person Making Complaint

Date _____

Please give this form to the receptionist or place in locked complaint box, if available. OR, you can email your complaint to rhidalgo@partnershipfca.com, or mail to: Customer Satisfaction
Partnership for Families, Children, and Adults, Inc.
1800 McCallie Avenue, Chattanooga, TN 37404

Do not write below this line

AGENCY FOLLOW-UP

Program Staff: _____ Date: _____

Discussion, possible solutions, recommendations (use back of form if necessary):

Signature of Program Staff: _____ Date: _____

Does the complainant wish to file a grievance? Yes No If yes, provide complainant with the name and contact information for the Program Director/Manager.

Name: _____ Contact information: _____

<i>Follow up</i>	<i>By Whom</i>	<i>Date Initial</i>	<i>Date Complaint</i>

Attach additional documentation as needed.

Does the complainant wish to appeal final decision/action of the grievance? Yes No If yes, provide complainant with the name and contact information for the CEO designee. Any further appeal will be forwarded to Chief Executive Officer.

CR-270-F-E Complaint Grievance Form (English)

Exhibit K

Partnership for Families, Children and Adults, Inc.

Formulario de Queja/Reclamación (CR-270-FS)

Nombre de la persona quien hace la queja: _____ Fecha: _____

Declaración de la Queja: (usa la parte de atrás del formulario si es necesario)

¿Te podemos contactar para más información? ___ Sí ___ No. Si contestó que sí, por favor provee información de contacto:

Firma de la persona quien hace la queja: _____ Fecha: _____

Por favor da este formulario a la recepcionista o ponlo en la caja segura de quejas si es disponible. O, puedes mandar tu queja por correo electrónico a rhidalgo@partnershipfca.com, o envía a:

**Customer Satisfaction
Partnership for Families, Children and Adults, Inc.
1800 McCallie Ave.
Chattanooga, TN 37404**

No escribir debajo de esta línea

Procedimiento de la Agencia

Empleado/a:

Fecha:

Conversación, posibles soluciones, recomendaciones (usar la parte de atrás del formulario si es necesario):

_____ Firma del empleado

_____ Fecha

¿Es el deseo del denunciante procesar una queja por escrito? ___ Sí ___ No. Si la respuesta es sí, proveer al denunciante el nombre e información de contacto del director del programa, y el director de calidad

Acción(es) siguientes	Quien es responsable	Fecha de inicio	Fecha completado

Adjuntar información adicional si necesario.

¿Es el deseo del denunciante pedir revisión de la decisión/acción final? ___si ___no. Si la respuesta es sí, proveer al denunciante el nombre e información de contacto del CEO designado. Si el denunciante desea una revisión final, la información pasará al CEO.

CR-270-F-S Complaint Grievance Form (Spanish)

Exhibit L

***PARTNERSHIP FOR FAMILIES, CHILDREN AND ADULTS, INC.
Client Grievance – Notification of Resolution (CR-270-F1)***

Date Grievance Received: _____ Date: _____

Complainant: _____ Respondent: _____

Assigned Program: _____ Work Site: _____

State the complainant's grievance in brief; but detailed terms (*attach additional documentation if necessary*):

TO BE COMPLETED AT THE PROGRAM LEVEL OR HIGHEST LEVEL OF RESOLUTION:

Was agency policy and procedure followed? Yes No If No, explain: _____

Were established timelines met? Yes No If No, explain: _____

Outline follow-up and eventual solution reached (*attach additional documentation if necessary*):

I have been advised of my right to appeal and prohibition against retaliation. Yes No

My signature affixed below signifies that I have received a copy of this notification of resolution and accept its outcome:

Complainant

Date

Witness

Date

CC: Program Director
PQI Coordinator
Client