

Complaints & Grievances Policy

1. Purpose and relationship to existing documents

Brandis Center Inc. encourages patients, parents, guardians, caregivers, and employees to raise questions, concerns, complaints, or grievances without fear of retaliation. This standalone policy consolidates the grievance and reporting expectations in the existing Patient Handbook, Consent & Policy Packet, and Employee Handbook. It does not replace those documents or change previously issued versions. The documentation, centralized tracking, and formal review steps described below are procedures to be implemented upon approval of this policy.

2. Definitions

Concern or informal complaint: A question or dissatisfaction that may be addressed through ordinary communication without a formal written determination. Formal grievance: A complaint requesting formal organizational review, including an unresolved concern or a matter involving patient rights, quality of care, privacy, discrimination, safety, billing, professional conduct, or employment practices. Good-faith report: A concern raised sincerely, whether or not the review ultimately substantiates it.

3. Who may report and how

Patients, legal guardians, caregivers, employees, and other relevant parties may report concerns verbally, in person, by telephone, in writing, or by email. Reports may be made to a staff member the individual feels comfortable approaching. Employees and families are generally encouraged to use the appropriate chain of command when practical, but are not required to report to someone involved in the concern. A concern may be elevated at any time. A formal grievance does not require an unsuccessful informal complaint first.

4. Patient and family reporting pathway

Families may speak with a Behavior Technician, the child's supervising BCBA, a member of the administrative team, the Clinical Director, or the Owner/Administrator. Clinical concerns are referred to the supervising BCBA for clinical review; operational concerns are referred to the Owner/Administrator. The Owner/Administrator has ultimate administrative responsibility for the grievance process and coordinates responses with the supervising BCBA when clinical expertise is needed. Formal grievances may be submitted in writing, by email, or in person, consistent with the existing Consent & Policy Packet.

5. Employee reporting pathway

Employees may raise workplace concerns with their direct supervisor, supervising BCBA where appropriate, or the Owner/Administrator. Employees may bypass their usual reporting relationship when it is uncomfortable, impractical, or involves the subject of the complaint. Existing Employee Handbook procedures concerning

discrimination, harassment, confidentiality, safety, ethical conduct, and nonretaliation remain applicable. This policy adds a consolidated administrative route for other employee complaints and grievances.

6. Alternative reporting and impartiality

If a concern involves the Owner/Administrator, the complainant may report it to the supervising BCBA, who will document receipt and coordinate referral to an appropriate independent professional, consultant, outside authority, or other impartial reviewer as the circumstances require. The person whose conduct is the subject of a complaint should not be the sole investigator or decision-maker. No internal procedure limits a person's right or duty to contact an external authority.

7. Confidentiality and nonretaliation

Brandis Center prohibits retaliation against anyone who raises a concern in good faith or participates in a review. Complaints will be handled as discreetly as reasonably possible, with information shared only with persons who need it to review, resolve, or report the matter. Absolute confidentiality cannot be promised when disclosure is necessary for a fair review, patient safety, mandatory reporting, or legal compliance. Filing a grievance will not negatively affect a child's access to medically necessary services.

8. Intake, review, and response

Upon implementation, the Owner/Administrator or designee will document complaints in a restricted-access tracking record, including the date received, reporting channel, nature of concern, persons involved where known, prior resolution attempts, action taken, referral or investigation steps, and resolution status. Anonymous reports may be reviewed to the extent information permits. Minor informal concerns may be recorded in summary form. Formal grievances will be acknowledged, reviewed promptly, and receive a written response describing the disposition and any appropriate next steps within a reasonable timeframe, subject to applicable legal or payer deadlines. Clinical issues will be reviewed with the supervising BCBA. Serious or urgent safety concerns will be escalated without waiting for routine review.

9. Investigation, corrective action, and records

Reviews may include conversations with involved persons, review of relevant records, consultation with clinical leadership, and other proportionate fact-finding. The Owner/Administrator will determine administrative corrective action, if warranted, in coordination with the appropriate clinical leader for clinical matters. Documentation will be retained securely, separate from routine public-facing materials, in accordance with applicable record-retention and confidentiality requirements. Employees must cooperate appropriately and must not alter or destroy relevant records.

10. External reporting and legal obligations

Patients and families may contact their health insurer, the Massachusetts Executive Office of Health and Human Services, relevant Massachusetts professional licensing authorities, or the U.S. Department of Health and Human Services Office for Civil Rights, as applicable. Employees may contact appropriate external oversight agencies for matters within their jurisdiction. Suspected abuse or neglect, privacy incidents,

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discrimination, safety events, and other reportable matters must be referred or reported as required by applicable law, professional standards, and payer contracts. Internal reporting does not replace an individual's mandatory reporting duty. Agency contact details are available from official agency websites or upon request.

11. Accessibility and communication

Brandis Center will consider reasonable accommodations and language assistance to support accessible complaint reporting and review. Staff receiving a complaint should listen respectfully, avoid promising an outcome, preserve confidentiality, and direct the concern to the appropriate leader. Families and employees may request clarification about how to file a formal grievance.

12. Quality review and staff awareness

Upon implementation, the Owner/Administrator will periodically review complaint records for recurring themes, timeliness, resolution status, and opportunities to improve services or workplace practices, with clinical input as needed. The organization will make this policy available to employees and families, including through its website, and will establish a process to communicate and document employee review of the policy. These new documentation and training steps should not be represented as historical practices until implemented.

13. Existing source documents

This policy is based on the Employee Handbook (including reporting concerns, nonretaliation, confidentiality, and professional conduct provisions), the Patient Handbook (patient rights and questions or concerns), and the Consent & Policy Packet (Grievances, Non-Discrimination & Patient Concerns, including formal grievances, external reporting, accessibility, and continuous quality improvement). If an applicable law or payer requirement is more protective or specific, that requirement controls. Leadership should resolve any apparent conflict before implementing a change.

Organizational contacts

Owner/Administrator: Travis Gordon | Supervising BCBA: Osmanny Cardona

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