Setting Inclusion/Exclusion Criteria: Determining the Scope of a Resource File

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Detroit Public Library

Discusses the need for referral agencies to establish and publish formal guidelines for inclusion in/exclusion from their resource files. Points suggested for coverage in such guidelines include: subject area focus; agency target groups; eligibility for services provided by membership organizations; geographic considerations; tax status; private practitioners; stability; funding sources; staff size; political and issue-oriented groups; and organizational viability. The author also discusses the need for disclaimers of responsibility and for formal procedures for handling complaints about an agency's inclusion or exclusion. Sample inclusion/exclusion criteria are appended. (Author abstract)

Agencies need to have guidelines to govern their resource file development—guidelines which explicitly state what criteria qualify an agency, organization, or program for inclusion in the file. Equally important are guidelines which specify what criteria disqualify an agency, organization, or program from inclusion in the file. Those guidelines should be committed to writing for three important reasons:

1) so that staff can apply them consistently;
2) so that staff can apply them easily without having to make case-by-case decisions; and
3) so that objective evidence can be available to support decisions which may be protested, either by

[1] Reprinted from v. 17 (1995).

agencies which object to the fact that they have been excluded from the file or by individuals or organizations which object to the fact that a particular organization has been included in the file.

AIRS' own National Standards for Information and Referral mandate that "The I&R service shall publish criteria for the inclusion or exclusion of agencies and programs in the resource file. These criteria shall be uniformly applied."[2] Uniform application of the criteria sounds like a noble goal; in reality, most agencies adopt a more flexible attitude toward their criteria, viewing them as governing what has to go into the file and what cannot go into it and allowing themselves some leeway in considering agencies and organizations which don't neatly fall within either category border.

While the resource file inclusion and exclusion criteria should both reflect and implement the agency's mission statement, they will likely be more specific. By their very nature, mission statements tend to speak in broad generalities. In contrast, inclusion and exclusion guidelines must be concrete enough so that they actually can be applied. The mission statement is analogous to the President's State of the Union Message, in which he announces in glowing but deliberately vague terms the types of legislative packages which he intends to introduce during the coming Congressional session. The inclusion/exclusion guidelines are like the legislative packages proper—they have to be specific enough to be implemented and enforced.

Several factors should govern the size and nature of a specific referral agency's resource file. Among them are:

1) local needs and conditions—A Minneapolis-based program will understandably attach a higher priority

[2]Standard 2, Criterion 3.

to *heating assistance programs* than will a Miami-based program.

2) program mission/target population—*ESL classes* represent a greater concern for the referral agency which focuses on recent immigrants than they do for the agency which focuses on a particular disease or disability.
3) other sources of information—If the local cancer society adequately tracks service programs targeted at cancer patients and their families and provides appropriate referral services to the public, other referral providers in the community don't need to put a lot of effort into tracking the same services. Instead, they can refer clients in need of such information to the cancer society and can focus their own data collection efforts on other subject areas.
4) ability to maintain reliable data—Referral agencies can serve their clients properly only if their file data is up-to-date. On the surface, it would seem that the larger an agency's file, the better the agency can serve its clients. In practical terms, however, a file's *size* is nowhere near as important as its *relevance, accuracy*, and *timeliness*. Unless resource staff are at least able to verify contact information (name, address, phone) for an agency or organization annually (reluctantly verifying service and eligibility data on a less frequent schedule), they may be better off not adding the agency or organization to their file.

Rather than suggesting specific guidelines for implementation by individual I&R programs, this paper will discuss various issues which agencies may want to consider when they're formulating their own policies.

Subject Area Consideration

Even the largest agencies can't assemble and maintain a truly comprehensive resource file. The agency I work for purports to maintain a comprehensive file,[3] but our staff knows that the file isn't *really* comprehensive—all it means is that we don't specialize in a particular subject area. While we go to great lengths to maintain data in certain areas (food, shelter, job training and placement, and governmental social services are some of our priorities), we touch more lightly on other areas like recreation and leisure services. We can get away with that because we don't exist in a vacuum; rather, we're only one of a network of I&R agencies which serve our region. We rely on our sister agencies to maintain in-depth information in certain areas, and we freely refer clients to them when appropriate.

The *Child Care Coordinating Council of Detroit/Wayne County*, for instance, tracks child care and related services in much greater detail than we could ever hope to—even to the extent of tracking individuals who are licensed by the state Department of Social Services to provide in-home child day care. Accordingly, we routinely refer callers seeking child care information or referrals to child care providers to *CCCC*.

Target Group Considerations

Some referral agencies focus their attention on a particular target population—cancer patients, perhaps, or Hispanics, or the aged, or the homeless. Those agencies' resource files naturally reflect their mission. File inclusion and exclusion guidelines, however, need to be more spe-

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[3] I support the distinction which Georgia Sales has made in the Info Line Taxonomy to classify information and referral programs as providing either *comprehensive I&R* or *specialized I&R*. The term *generic I&R* should be replaced by the more positive concept of *comprehensive I&R*.

cific than merely citing target populations. While we may tend to associate particular needs with particular groups (perhaps *medical care* and *medical information* with *cancer patients*, or *soup kitchens* and *temporary shelter* with the *homeless*), every group (like every individual, for that matter) has a variety of potential needs. A cancer patient might need *sickroom supplies*, but so might an aged person or a Hispanic person. Members of all four groups might need *marriage counseling* or *tax return completion assistance*.

While it's okay to cite the target group in the agency's mission statement, the inclusion and exclusion criteria need to be much more specific.

Service Eligibility Considerations for Membership Organizations

Every community has numerous organizations which provide important human services—but only to their own members. While it might theoretically be appropriate for the referral agency to include such organizations in its resource file (with appropriate eligibility statements), routine inclusion of such organizations can increase the file's size exponentially. This would have an adverse impact both on file maintenance and on file searchability. If the file were to grow from 30 organizations which operate *Christmas basket* programs to 150 that do so (but 120 of which are restricted to members of individual church congregations), has progress been made or not? Agency staff are likely to end up spending more time making the same number of actual referrals to clients than they did with the original file.

Referral agencies need to examine this point carefully. Rather than routinely including membership organizations in their files, they may wish to restrict the file to those which provide services to individuals who aren't members. Thus, the church which runs a Christmas basket program for residents of a particular area might be considered for inclusion, while the neighboring church whose basket program is restricted to members of its congregation would not.

Geographic Considerations

One of the first decisions an agency must make in setting limits for its file concerns geographic parameters. Will the file list agencies and organizations which are *located in* a particular area or those which *serve residents of* that area? Selecting the latter option will obviously qualify a larger number of organizations for inclusion. While this will presumably better serve the referral agency's clients, it will also increase the workload of staff assigned to maintain the file.

Regardless of whether files are limited by location or by service area, geographic criteria need to be phrased in concrete terms. They shouldn't speak of *southeastern Michigan*; different persons may define that region's boundaries in various manners. Rather, they should cite specific cities, counties, and street boundaries—*Macomb, Oakland, and Wayne counties* rather than *metropolitan Detroit*, and *The area bounded by: N—Eight Mile Rd.; E—Southfield Fwy.; S—McNichols Rd.; and W—city limits* rather than *far northwest Detroit.*[4]

Tax Status

Some agencies specifically exclude for-profit organizations from their files. While this guideline is simple to apply, implementing it isn't always in the client's best interest. What happens if a for-profit organization offers an important service which isn't available from any not-for-profit

[4]Resource file staff who strive for such specificity in citing the service areas for the agencies and organizations in their files may reluctantly have to settle for considerably vaguer information.

organization? By excluding the organization, staff may unintentionally deny clients access to an important service.

Here's an example. Michigan Bell, the primary local telephone service provider for southeastern Michigan, is definitely a for-profit organization. Yet their *Michigan Relay Service (MRS)* is a free service which provides deaf and hearing-impaired persons who have access to TDD/TTY equipment with a means of communicating with telephone users who do not have such equipment. MRS staff read the TDD/TTY message aloud to the party which doesn't have the equipment and then type that person's spoken messages back to the TDD/TTY user.[5] Should we exclude this important service from our file because Michigan Bell is a for-profit business? We opted to include it in our file.

Some referral agencies include for-profit companies if they meet additional criteria. A common criterion is that the for-profit agency provide a service either free of charge (as is the case in the *Michigan Relay Service* example cited above) or on a sliding-fee basis. Another criterion might be that the fees charged the client by the for-profit agency be paid by a social service agency serving the client.

Even if the referral agency decides not to make non-profit status an inclusion criterion, staff may wish to reflect an organization's tax status in the file entry. Rather than taking an organization's word for their status, it's a good idea to go to a more authoritative source. The definitive source seems to be the Internal Revenue Service's 2-volume work, Cumulative List of Organizations Described in Section 170(c) of the Internal Revenue Code of 1986. The

[5]Federal law mandates that phone service providers offer free telephone relay services to effectively connect TDD/TTY users with the entire phone network. If you're not aware of the relay service serving your community, check with your phone company or with agencies serving your hearing-impaired community.

item is available for purchase from the Superintendent of Documents office of the Government Printing Office.

Private Practitioners

Some referral organizations include private practitioners in their resource file. The practice seems particularly prevalent among I&R agencies which publish directories. Practitioners are sometimes charged a fee for inclusion in the file or directory, thereby helping to defray printing and distribution expenses.

Referral agencies should be cautious in this area because of both ethical and legal liability considerations.[6] If particular professions are licensed by governmental bodies, agencies should verify that individuals are indeed licensed before adding them to their file.

An alternative to including private practitioners in the file is including professional societies who can refer individuals to their members in good standing. These societies will likely track their members' specializations and expertise in more detail than the referral agency can afford to, thus providing a better fit to the client's specific need. The professional society may also become aware of complaints of malpractice, billing, or other problems more quickly than the referral agency will and may curtail referrals accordingly.[7] In any event, the referral agency which directs callers to professional societies for referrals to private practitioners would appear to be more insulated from liability than the agency which makes direct referrals to practitioners.

[6]See also the section on disclaimers later in this article.

[7]Or may not—remember that the professional society exists to serve its members and may be protective of them.

Stability

Formal agencies usually have fixed offices. If an agency moves to a different location, address change forms will almost always be filed with the Postal Service, and telephone directory assistance operators will be able to alert callers to new phone numbers.

But what about organizations which operate without formal offices? Clubs and mutual support groups often rely on members who volunteer to serve as contact persons. What happens when that person moves, changes his/her phone number, or severs his/her connection with the organization?

One way of increasing the likelihood of maintaining contact with local organizations without fixed locations is to also track their state, regional, or national headquarters. Our file's record for a contact person for the *Greater Oakland Mothers of Multiples (GO MOMS)* may be out-of-date at any given moment, but a quick side-call to the parent organization (the *National Organization of Mothers of Twins Clubs* in Albuquerque) should quickly provide a current contact for the Oakland County affiliate, enabling us to both provide a referral to the client and to update our file data.[8]

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[8]Non-librarians may not be aware of the value of the Encyclopedia of Associations (Detroit: Gale Research, annual) for tracking national organizations. This compendious work contains names, addresses, phone numbers, descriptions, publications, and events for over 22,000 organizations ranging from fan clubs to professional societies to trade organizations. The multi-volume set (also available on CD-ROM) is organized thematically, but its keyword index provides comprehensive access to all entries. Gale also publishes multi-state regional companion volumes which list state and local associations and societies. Virtually every public and academic library holds the EA; if a referral agency can't afford to purchase the title, staff should still have access to it through a local library.

Funding Source

Some referral agencies restrict their files to agencies and organizations which have been funded by a particular source. This practice is particularly prevalent among I&R programs operated by United Way and Community Chest organizations.

Staff Size

Some referral agencies insist that an organization have at least one full-time paid staff member before they'll consider adding it to their file. This stipulation ensures some degree of stability and accountability and eliminates the headaches associated with organizations which can never be contacted.

At the same time, this policy can exclude from an agency's file some organizations which provide important services to the public.

Political and Issue-Oriented Groups

Political cause and issue-oriented action groups pose a dilemma for the I&R agency. Such groups are often ephemeral, springing up overnight like mushrooms after rain and then equally quickly dropping from sight. They seldom have any fixed address or phone number.

The real problem, however, is one of balance. By including in its file a group espousing a particular cause, the agency exposes itself to charges of bias. While such complaints may not come often, the ones that are received can be loud and ugly.

One way of defusing such potential complaints is to strive for balance in the file. Our agency's file contains both pro-life and pro-choice groups, both pro-gun control and anti-gun control groups. In order to balance the various women's rights organization entries in the file, we've also included the *Stop ERAmerica* group and a second organization whose mission statement says that they're *Dedicated to preserving traditional women's roles in American society*. I don't know whether we've ever made a referral to either of these groups (and I've seen some really strange reactions on the part of women new to our staff when they've run across them in the file), but we keep them there to counter possible charges of bias.

It's also important to remember that a referral agency's staff has other resources at their disposal beyond the formal resource file. The staff at our agency maintains an extensive collection of directories to supplement our electronic file. When we got calls in past years from people wanting to contact the local branch of the *National Association for the Advancement of White People*, we could find that information in the local phone book; there's no longer a phone book entry, so now we'd have to use the <u>Encyclopedia of Associations</u> (see footnote on preceding page) to refer them to the group's headquarters in New Orleans. Excluding an organization from the formal file doesn't necessarily mean denying your clients access to that organization.

Organizational Viability

Many organizations never really get off the ground. After an initial flurry of enthusiasm, the citizens' group formed to mobilize dissent against the governor's proposed radical welfare reform proposals loses steam; the initial organizer moves on to other issues, and nobody takes up the reins. The church which organized the innovative working women's clothing closet program to provide hard-core unemployed persons with outfits suitable to wear to job interviews and to last them on a new job until they get their first paycheck exhausts their inventory and discovers they can't replenish it.

When new organizations or new programs of existing organizations go under, it's not just a problem for the organization's or program's potential clients. It's a problem for the referral agency, which has invested time and effort getting the data into its file and must now put more effort into taking the data out of the file.

Some referral agencies try to minimize such wheel-spinning by not even considering adding new agencies or programs to their files until they've been in successful operation for a set period of time—perhaps six months, or even a full year.

* * *

Disclaimers of Responsibility

In this litigious age, agencies need to be aware of their potential legal liability. If a client feels an agency or private practitioner hasn't properly represented him or her, a lawsuit may ensue. Could the client also sue the I&R agency which referred him or her to the party being sued? Probably. Could the client win the lawsuit? Your guess is as good as mine. But even when they don't result in adverse judgments, lawsuits are terribly disruptive events to be avoided at almost all costs.

I&R agencies need to make clear to clients that they are providing *referrals*, not *endorsements*, *recommendations*, or *ratings* of potential service providers. In making referrals, the I&R agency should be presenting the client with a list of organizations which purport to provide certain services; care should be taken neither to recommend a particular agency nor to make any promises regarding what services any organization will ultimately provide to the client. Staff need to stress this point when making referrals to clients; rather than saying *The Department of Social Services <u>will</u> be able to provide you with that rent deposit*, they should say something more cautious, like *Our records indicate that the Department of Social Services <u>is sometimes able</u> to provide <u>qualifying applicants</u> with rent deposits; check with them to see <u>if</u> they can help you*. Clients sometimes don't pick up on these qualifying statements, but it still behooves the referral agency to make them. It's also good practice always to present clients with multiple referrals; not only does this permit them greater flexibility, it places the onus for selecting a particular service provider on the client.

More concrete disclaimers are possible in published directories—perhaps a statement on the verso of the title page to the effect that *Inclusion in this directory should in no way be construed to constitute an endorsement of an agency or organization or its service, nor should exclusion be construed to constitute disapproval*. Many referral agencies include statements like *The information which appears in this publication was provided by the agencies and organizations.*

Other vehicles can also be used to communicate the message. Agencies which use phone queues can incorporate brief disclaimers into the recorded message which periodically reassures callers that they're still in the queue and will be connected with a staff member.

* * *

Complaint Handling Procedures

Inevitably, referral staff will receive occasional complaints about agencies and organizations which have been included in their resource file or which have been excluded from it. Though they're often bothersome to deal with, these complaints should be viewed as valuable feedback which can help improve the file. Some complaints may reveal outdated or wholly inaccurate file information; others may indicate that agencies aren't really delivering the services which they purport to. And still others may force the referral agency to examine its policies.

Every complaint should be both acknowledged and investigated. Formal written procedures should be established, made available to complainants upon request, and followed. The procedures may address the following points:

- how the complaints should be filed (completion of a written form either by the complainant or by a staff member taking the information from the complainant is probably a good idea to ensure that adequate information is received)
- potential grounds for exclusion/removal from the file (service non-delivery, fraud, misrepresentation, discrimination, etc.)
- confidentiality—does the organization whose inclusion is being protested have the right to know who filed the complaint?
- referral agency staff charged with investigating the complaint and/or ultimately ruling on it
- feedback to the complainant
- appealing the ruling

Agencies and organizations which are either refused inclusion in a file or directory or are initially included and subsequently removed will generally not be happy about it. Referral agencies need to prepare service providers for this possibility by helping them understand that inclusion is a *privilege* rather than a *right*. Some agencies include appropriate warnings on the survey forms which they send to service providers to gather, confirm, or update their file data. The forms sent out by *INFO LINE, INC.*, of Akron explicitly state that the agency reserves the right to remove or exclude any organization from their file *for any reason*. While that statement sounds rather draconian, it gives staff the power to enforce decisions which are made after careful consideration.

* * *

The Wiggle Factor: Building in Flexibility

As Ansel Adams' fans can attest, the world consists not only of blacks and whites but of innumerable shades of gray. While an agency will probably be able to identify certain types of services and service providers as <u>absolutely belonging</u> in its resource file and others as <u>unequivocally being inappropriate</u> to it, there will always be areas which can't be pre-judged by simple either/or criteria.

Agencies may wish to build some degree of flexibility into their guidelines so as not to handcuff themselves. Phrases like *may be considered for inclusion* or *will be considered on a case-by-case basis* can permit agency staff to be selective. Care should be taken, however, not to abuse this device. The blacks and whites should dominate the agency's guidelines, with the gray <u>sometimes</u> areas being used sparingly.

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Putting It All Together

Just as every referral agency is different, every agency's resource file inclusion/exclusion criteria will be different. There's no right way or wrong way for such guidelines to be structured—just ways that either work or don't work for a particular agency's file.

Sample inclusion/exclusion guidelines from some AIRS member agencies are appended.

Peter Aberg, Margaret (Gillis) Bruni, Terry Gahman, Georgia Sales, and, especially, Elaine Woloshyn also contributed ideas for this article.

GUIDELINES FOR INCLUSION IN THE RESOURCE DATA BASE

Information & Referral Services, Inc.
3130 N. Dodge Blvd.
Tucson, AZ 85716
520/323-1303

- The service must be accessible to the public. Accessibility implies a sliding fee scale (negotiable to $0) ensuring that services can be obtained by people who cannot afford private sector services. Inclusion of services available only to a limited target population will be determined on a case-by-case basis.
- Organizations which provide services in health, welfare, support, recreation, education or advocacy and are not-for-profit corporations (with Internal Revenue Service 501(c)(3) status), or do not charge fees for service, are welcome additions to our database.
- Government agencies (federal, state, county, city) which provide services in the areas of health, welfare, recreation, or education may also be included. No attempt will be made to list all governmental agencies or departments.
- For-profit organizations are considered on an individual basis. Inclusion is based upon uniqueness of service, lack of comparable services available through not-for-profit agencies or

groups, and degree of need for the service and the level of subsidized services available.

_ I&R reserves the right to edit information to meet format, guideline, and space requirements.

_ Agencies or organizations that have been in existence or listed with I&R for a minimum of one year and are expected to continue operation may be considered for Directory of Human Resources.

_ I&R reserves the right to refuse or discontinue listings for organizations that have had serious complaints lodged against them with any regulatory body or with I&R.

Inclusion of an agency or organization does not imply endorsement by I&R

INCLUSION/EXCLUSION CRITERIA FOR RESOURCES

ASK-2000
200 N. Vineyard Blvd., #415
Honolulu, HI 96817
808/275-2000

A. Criteria for Inclusion

1. All Hawaii-based government and non-profit organizations providing health, education, social service, recreation, legal or consumer protection services may be included. Toll-free telephone lines operated by government or non-profit organizations may be included.
2. Individuals in private practice (such as physicians and psychologists) and for-profit businesses shall not be included unless they meet both of the following criteria:
   a. They provide a service in the areas of health, education, social service, recreation, legal or consumer protection; and
   b. The service is not available within the government or non-profit sector, or there is a large "gap group" not adequately served by government and non-profit organizations.

If a for-profit organization or private practitioner is offering a free service to the community, the free service may be listed in the resource file but not services for which a fee is charged unless it meets the criteria above.

2. When no Hawaii-based organization provides a needed service, a national organization providing the service may be listed.

B. Quality of Service

ASK-2000 does not evaluate the quality of services provided by organizations in the resource file.

If ASK-2000 telephone specialists are asked to choose the "best agency" in a particular field, they will assist the caller to select an appropriate agency or agencies. Telephone specialists will assist callers in making such selections by providing relevant information about fees, location, services provided, availability of interpreters, etc.

If complaints about an organization are made by callers, ASK-2000 will:

1. Inform the caller of the appropriate agency to handle the complaint; and
2. If a significant number of similar and serious complaints are received about an organization,

ASK-2000 may remove the agency from the resource file. Prior to removing any agency from the resource file, the Resource Manager will investigate using the methods described below in the section on questionable practices.

C. Controversial Activities

Some organizations provide services or advocate on issues which may be controversial in nature. Information about an organization's policies, views or issues which will assist potential consumers in selecting a resource should be included in that agency's record in the resource file. Examples of this type of information include religious observances which are required in order to obtain services or the organization's points of view on issues.

Whenever possible, the resource file should include organizations which represent a variety of points of view on any given issue in order to provide callers with a choice of options.

D. Organizations Which Engage in Fraudulent or Questionable Practices

Organizations which may be defrauding the public, violating laws or engaging in questionable fundraising or administrative practices shall not be listed in the resource file. If there is a question of the legitimacy of any organization, ASK-2000 will base its decision regarding inclusion/exclusion on information obtained from the following sources:

1. Department of Commerce & Consumer Affairs, Business Registration Section (to determine if the organization is registered as a charity in the State of Hawaii);
2. State Office of Consumer Protection;
3. Better Business Bureau, Philanthropic Advisory Service;
4. Appropriate licensing body (if licensure is required for that type of organization);
5. Other organizations in the ASK-2000 resource file which provide similar services.

INCLUSION/EXCLUSION CRITERIA FOR THE RESOURCE FILE: GUIDELINES

Information Services, Vancouver
202-3102 Main Street (Heritage Hall)
Vancouver, BC V5T 3G7 CANADA
604/875-6381

Included in our resource file are the following:

1. Non profit agencies providing a community service.
2. Organizations (such as churches, social clubs) which offer a service to the community at large, not just their own members.
3. Private companies which provide a community service either free, or with a sliding scale of fees.
4. Self-help support groups.
5. Elected representatives (federal, provincial, municipal).
6. Hospitals, health clinics, personal and intermediate care homes.
7. Organizations outside of our geographic parameters which provide a service not available locally, but available to B.C. residents (i.e., the Canadian Medic Alert Foundation).
8. Professional organizations (especially those organizations in the social service field).
9. Advocacy groups.

10. 800 lines, if they can be accessed by B.C. residents, and if they offer some sort of social or community service.
11. Organizations offering services parallel to a non profit service to which clients are referred and fees paid by a governmental agency. (i.e., proprietary agencies are offering homemaking services to qualified clients on the same basis as the non profit agencies, and are paid by social services agencies).
12. Commercial organizations offering a service not available in the non-profit sector.
13. Paid listings of social workers, psychologists, clinical counsellors and family and marriage therapists who are currently registered for private practice with the Psychological Assn. of B.C., the B.C. Assn. of Social Workers, the B.C. Assn. of Clinical Counsellors or the B.C. Assn. of Family and Marriage Therapists.

Excerpts from CHILD CARE CONNECTION Directory Published by

Info Line, Inc.
474 Grant Street
Akron, OH 44311-1157
216/376-1157

Disclaimer

Child Care Connection does not endorse, rate, recommend, or evaluate child care resources, programs, or providers and therefore, Child Care Connection does not assume, warrant, or guarantee quality care. Any information about a caregiver/provider has been provided solely by that caregiver/provider. Child Care Connection believes that consumers are in the best position to evaluate and choose resources appropriate to their child's needs.

Complaint Policy

GENERAL PROCEDURES

- CCC will report all complaints to the proper agency including Children Services Board, the Ohio Department of Human Services, or local police departments. Consumers making complaints will also be encouraged to call the appropriate agency to report the incident.
- All complaints are confidential.
- CCC will document every complaint received, including: the nature of the complaint, frequency and resolution.

_ CCC will follow up each complaint with both the caller and the agency handling the complaint.
_ CCC will terminate referrals to a program until a determination has been made by the agency handling the complaint.
_ Additional referrals will be given when a caller chooses to make a change in providers, for whatever reason.

PERSONAL COMPLAINTS

_ Personal complaints are those in which the parent and provider have differing views on child rearing philosophy, caregiving style, or business disagreements.
_ Typically, personal complaints are discussed between the provider and the complainant. However, if the complainant wishes, CCC will intervene, while guarding anonymity, and share the complaint with the provider. If requested, CCC will offer technical assistance to the provider.
_ CCC will respond within 48 hours after receiving a complaint.
_ Follow up calls to complainants will be made if permission is granted.

LICENSING VIOLATIONS

_ The Ohio Department of Human Services is responsible for all complaints related to the Child Day Care Licensing Regulations. This unit has jurisdiction over center based care, Type B certified family child care homes, and Type A group homes.

- _ All alleged licensing violations will be reported to the Ohio Department of Human Services.
- _ Follow up calls will be made after five working days in order to allow for a full investigation by the Child Day Care Licensing Specialist.
- _ CCC will follow up with the licensing unit concerning licensing status as a result of the investigation.
- _ CCC will follow up with the caller and offer technical assistance.

CHILD ABUSE/NEGLECT

- _ The caller is told to contact the proper agency* responsible for the investigation of all complaints related to child abuse/neglect to report the violation.
- _ CCC will also notify the proper agency and file a report.
- _ CCC will not make referrals to the program/provider until the investigation is completed and the proper agency has been contacted concerning licensing status as a result of the investigation.

*Phone numbers are appended to the document.

Although **Dick Manikowski** is Network Administrator and Systems Specialist for the Detroit Public Library—TIP Database & Subscriptions, he also works with the unit's resource database, which is used by several I&R programs throughout metropolitan Detroit.

Detroit Public Library—TIP Database & Subscriptions
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