

FY 2024

Accountability to Affected Populations Policy

Our organization, named above, abides by the Accountability to Affected Population (AAP) guidelines and policies developed by Episcopal Migration Ministries (EMM), including EMM’s AAP Framework. Our organization practices accountability to affected populations by participating in capacity building and developing initiatives to encourage participation from beneficiaries in decisions that affect their lives. Using EMM’s framework, our organization is committed to collecting and using feedback from the people we serve to ensure transparency and accountability.

We will use the information we gather from beneficiaries to improve our services, taking into consideration complaints as well as suggestions provided by the affected population. Our organization will also provide beneficiary feedback to EMM on a quarterly basis through its Quarterly Consultation report in IRIS. Below, we lay out the policies that are part of our efforts to ensure accountability to affected populations.

GROUP NAME Beneficiary Feedback Policy

<p>1. Channels used to gather feedback</p>	<p>Our organization gathers feedback from beneficiaries through multiple methods:</p> <p>First, we have a grievance policy (outlined below). Clients may provide feedback through grievances related to our services during or after their service period.</p> <p>In addition, we will use: [pick one or more of these methods, and include in your document ONLY those you intend to use]</p> <p><u>Mid-service period check-ins</u>: Informal feedback is collected throughout the service period by case managers to ensure client understanding and satisfaction of the services provided.</p> <p><u>Exit Surveys</u>: Exit surveys are provided to clients by case managers, case aides or trained volunteers at the time of case closure.</p> <p><u>Feedback email</u>: Our organization maintains a separate email address used solely for clients to send feedback. The email is received by The specific email address to use is provided to clients during the intake process.</p>
<p>2. Team member responsible for compiling feedback</p>	<p>Beneficiary feedback is compiled by</p>
<p>3. Protocol for compiling feedback</p>	<p>All beneficiary feedback is initially noted in individual case files. Once our organization resettles more than one case, we will compile and track beneficiary feedback in this format:</p> <p>Feedback from any grievances filed and from any other feedback methods (listed above) are entered into this document by _____ on a monthly basis.</p>



<p>4. Protocol for processing feedback</p>	<p>Team leaders review feedback from all sources on a quarterly basis during scheduled management meetings. Our goal is to assess the extent to which our organization is fulfilling the requirements of the Reception & Placement program, identify areas for improvement, and shape policies and procedures to address identified issues.</p>
<p>5. Protocol for categorizing feedback</p>	<p>Our organization compiles and tracks both positive and negative feedback; both are used to ensure that we are meeting clients' needs, complying with contractual obligations, and designing effective programming.</p> <p>We also differentiate between urgent and non-urgent feedback, as explained below (in point 6).</p>
<p>6. Protocol for responding to urgent and non-urgent feedback</p>	<p>Our organization maintains a protocol for identifying issues requiring urgent attention. Matters of urgency include (but are not limited to) issues of client safety or health, unfulfilled program requirements, inappropriate behavior by our organization's leaders or volunteers, and concerns deemed urgent by clients. Team members receiving the feedback promptly report the issue to the team leader, who determines a plan to resolve the urgent matter. Our organization's policy is that all urgent feedback is addressed within one week of receiving the feedback.</p> <p>Complaints and suggestions related to a particular client's service are noted and shared with applicable team members, to ensure prompt follow-up and resolution. Positive feedback and criticism about program guidelines, procedures, activities and team members are used to guide program improvement.</p>
<p>7. Policy on storage and archiving of beneficiary feedback</p>	<p>Our organization retains beneficiary feedback alongside records from the program year in which the clients were served; paper records are maintained in storage for 3 years. Electronic records of compiled feedback are also maintained for a minimum of 3 years.</p> <p>Feedback specific to the service of an individual client is also maintained in the client's casefile, with actions related to addressing the complaint detailed in case notes.</p>

Policies related to clients' rights and responsibilities

<p>I. Policy on confidentiality and consent for release of information</p>	<p>All client records created by our organization are protected under state and federal privacy protections: they may not be disclosed or shared without the written consent of the client unless otherwise provided by law. All team members involved with our organization must uphold client confidentiality, and may share information about clients with other organizations, government agencies and individuals only when given written permission to do so by the client.</p> <p>At the initial intake meeting with clients, team members explain our organization's policies on client confidentiality and review the "Authorization to release information" form. If they agree, each adult member of a client case signs the release form, which covers the entire 90-day R&P period.</p>
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<p>2. Policy on Protection Against Sexual Exploitation and Abuse (PSEA)</p>	<p>Our organization’s policy on Protection Against Sexual Exploitation and Abuse (PSEA) is as follows:</p> <p>Sexual Exploitation and Abuse It is the policy of _____ to require all participants (team members, volunteers, independent contractors, etc.) to nurture safety in the work we do by maintaining appropriate boundaries, being attentive to self-care, education, and the importance of referring those in need to supportive and helpful resources.</p> <p>Sexual exploitation or sexual harassment of any person by anyone engaged in work performed on behalf of _____ is unethical behavior that will not be tolerated. Any such behavior will be cause for immediate termination of volunteer or contractual work or any role with our organization.</p> <p>Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.</p> <p>Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, is prohibited. This includes the provision of assistance that is due to beneficiaries.</p> <p>Sexual relationships between anyone working with _____ and beneficiaries are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.</p> <p>If a team member develops concerns or suspicions regarding sexual abuse or exploitation by any other person involved in the organization, he or she must report such concerns as follows:</p> <p>a) to the team leader or b) if a concern involves the team leader, then to EMM’s Senior Program Officer for Remote Placement.</p>
<p>3. Policy on clients’ rights and responsibilities</p>	<p>Our organization’s policy on clients’ rights and responsibilities is reviewed with each client at the time of intake. The policy states:</p> <p>Client Rights – You have the right:</p> <ul style="list-style-type: none"> • to be treated with <u>respect</u> and <u>fairness</u> by everyone involved in our organization • to help <u>plan</u> the services you will receive • to receive the required <u>services</u>, <u>financial support</u>, and <u>information</u> during your resettlement period • to have all required services explained to you and provided in a <u>language you understand</u> • to receive services <u>without discrimination</u> based on age, color, disabling condition, ethnicity, gender, marital status, national origin, political affiliation, race, religion, or sexual orientation • to <u>refuse services</u> and support offered by our organization • to file a <u>grievance</u> in accordance with our organization’s grievance policy if services are not provided in a satisfactory manner and to provide <u>feedback</u> on the program without a fear of negative consequences



	<ul style="list-style-type: none"> • to keep your household information <u>private</u>, unless you have given permission to have it shared • to view your <u>case file</u>, <u>case notes</u> and <u>case financial documentation</u> and to request explanation when necessary, regarding their content <p><u>Client Responsibilities – You have the responsibility:</u></p> <ul style="list-style-type: none"> • to provide to team members working with you <u>all information appropriate</u> for your planned services • to <u>stay in contact</u> with and <u>notify our organization</u> about relevant changes in your situation (change in contact information, living situation, health, employment status) • to <u>comply</u> with the program requirements after they have been explained to you, and <u>participate actively</u> in your own resettlement • to <u>ask questions</u> when you don't understand • to <u>attend</u> all required classes and appointments • to be <u>on time</u> to classes and appointments with members of our organization.
<p>4. Policy on training team members regarding clients' rights and responsibilities</p>	<p>Upon hire/recruitment, new team members are trained in our organization's policies, including the rights and responsibilities of clients, as part of the standard onboarding process. On an annual basis, all team members review our organization's policies on clients' rights and responsibilities.</p>

[GROUP NAME] Grievance Policy

<p>1. Protocol on providing our <i>Grievance Policy</i> to clients</p>	<p>At the initial intake meeting with clients, team members explain our organization's grievance policy to clients. The policy is reviewed in the client's language, via interpretation. (See point 2 below.)</p> <p>Upon review, each adult member of the case signs the grievance policy.</p>
<p>2. Protocol for interpretation of <i>Grievance Policy</i> for clients</p>	<p>Regardless of whether a translated written grievance policy is available, the grievance policy is reviewed with clients by a team member or interpreter who speaks the client's language. The interpreter signs the English language form to verify and document that the information was <u>provided in the client's language</u>.</p>
<p>3. Protocol on case file documentation of <i>Grievance Policy</i> provided to clients</p>	<p>A copy of the grievance policy, signed by all adult members of the case, is maintained in the case file, and a copy is given to the client. When available in the client's language, the translated version is also signed by all adult members of the case, maintained in the case file and a copy is provided to the client.</p>
<p>4. Protocol for receiving grievances</p>	<p>Our organization receives grievances from clients in person, by telephone, or in writing; in writing, complaints may be submitted electronically or on paper. Upon receiving a written or telephone complaint, the team member receiving it schedules a meeting with the client to discuss the complaint in person.</p>
<p>5. Our organization's point of contact for resolving complaints</p>	<p>The first point of contact for a complaint is the team member serving the client. If that person is not available, or if the client is not comfortable sharing the complaint with that team member, another team member will be available to resolve the complaint.</p>

6. Protocol for addressing a complaint if not resolved by first point of contact	If the complaint cannot be resolved by the first point of contact, the client is instructed to bring the complaint to the team leader. If the client feels the issue is still not resolved, the complaint may be brought to EMM (as outlined in points 9 and 10 below).
7. Policy regarding timeframe for meeting a client with a grievance	Our organization is responsible for responding to any client grievance within 5 business days of the complaint; if deemed urgent, team members will respond as soon as possible. They will set up an in-person meeting with the client within 1 week of receiving the complaint, as able to be accommodated by client's schedule.
8. Policy on interpretation and use of representative at meeting with team members	Our organization must arrange for interpretation for an appointment to hear a client's complaint. Clients may be accompanied by a representative as desired.
9. Protocol for notifying EMM of an urgent grievance	Any complaint or issue involving a minor, report of fraud, or exploitation of any kind will be communicated with EMM. In the event of an urgent complaint requiring notification of EMM, the team leader will either a) provide the client with EMM's contact information to make the complaint directly or b) assist the client in communicating the complaint with EMM. The team leader will make the decision about whether any other complaint is one that requires notification of EMM.
10. Policy on whom client should contact for complaints that are unable to be resolved by our organization	Should a client enrolled in an EMM-funded program feel that has been unable to resolve the complaint, our organization will provide the client with the contact information for EMM. This is also provided to clients as part of our organization's Grievance Policy. Episcopal Migration Ministries emm@episcopalchurch.org 212-716-6104 815 2nd Ave New York, NY 10017

Each organization working with EMM should attach to this policy the form(s) that they provide to clients regarding client rights, responsibilities, and the grievance procedure, and submit all to EMM.

FY 2023

Fraud Prevention Policy

Our organization is dedicated to ensuring integrity, accountability, and respect to clients and affected populations through a just and transparent process. Our organization takes seriously acts of fraud and negligence, and thus understands the importance of prevention at all levels.

Through this policy, our organization ensures that mechanisms to prevent dishonesty, intimidation, discouragement, and retaliation are in place and can easily be used by team members and clients. Our organization acknowledges that it is our responsibility to report on any acts of fraud and fraudulent activities. Our organization also agrees to abide by all EMM policies (whistleblowers, sexual harassment and abuse, and conflict of interest) that are part of our signed Memorandum of Agreement.

Fraud Prevention Policy

<p>1. Policy on training team members about fraud prevention and negligence regarding fraudulent activities</p>	<p>[Provide detail on how you will do this:]</p> <p>[Please include this paragraph as well:]</p> <p style="padding-left: 40px;">trains team leaders and members to comply with program guidelines, including those pertaining to fraud. The R&P Cooperative Agreement includes policy on reporting fraud to DHS and USCIS. Public assistance programs include policy and procedures for reporting income and fraud.</p>
<p>2. Policy on non-duplication of client services</p>	<p>[Provide detail on how you will do this:]</p> <p>[Please include this paragraph as well:]</p> <p style="padding-left: 40px;">coordinates its services for refugees with other organizations and service providers in the community, to ensure non-duplication of services. If applicable, information about clients' enrollment in ORR programs is shared with other service providers to ensure client is not doubly enrolled in duplicative services. If applicable, team leaders also meet regularly with staff from the State Refugee Coordinator's office to ensure coordinated services.</p>
<p>3. Policy on informing clients about fraud prevention and welfare fraud</p>	<p>[Provide detail on how you will do this:]</p> <p>[You may include this paragraph as well:]</p> <p>Team members provide orientation and information about client responsibilities pertaining to public assistance at numerous junctures, including at the time of application for public assistance, during the Welcome Meeting cultural orientation, and during ongoing cultural orientation. Team members reinforce this information during orientations and program enrollments. The requirement to report earnings to public assistance is again reviewed with clients prior to case closure, or when a client obtains employment during the R&P period.</p>
<p>4. Policy on clients' rights and responsibilities (including timelines and staff</p>	<p style="padding-left: 40px;">review with clients their rights and responsibilities as well as our organization's responsibilities in the R&P program during initial intake and orientation.</p>



<p>responsible) regarding required reporting of any status changes to public assistance providers.</p>	<p>Clients' rights and responsibilities related to accessing public assistance are also reviewed with clients at the time of application. This includes client responsibilities to report within 10 days any changes in employment, income, property, immigration status, marital status, or other relevant matters. Clients are advised that they will be asked to supply information about their income at regular intervals in the future, and that they must supply information when requested. Clients are advised of their rights to privacy, to reapply if benefits end, to appeal a decision, and to access free legal services.</p>
<p>5. Policy on direct client assistance (Financial tracking/ledgers review, receipts maintenance, and documentation)</p>	<p>[Explain how direct client assistance will be handled: who can request it, by whom it must be approved, and who will issue approved amounts. Who will be responsible for keeping, tracking and reviewing financial records, receipts and documentation?]</p> <p>[You may want to use some of this language:] Adult clients sign receipts acknowledging all direct assistance provided to them. They also review and sign a financial log that documents all expenses made on their behalf and the full expenditure of R&P per capita.</p> <p>Copies of all requests, checks, receipts, invoices and other financial records related to direct client support are maintained in the client casefile.</p> <p>The team's designated reporter will log all R&P per capita expenses in IRIS, the database that EMM uses, for inclusion in R&P period reports.</p> <p>[Identify specific role on team] maintains financial records, including copies of all financial documentation, and prepares reimbursement requests to funders, including EMM. [Name another role] approves all reimbursement requests.</p>
<p>6. Policy on procurement (example: vetting vendors, receipts)</p>	
<p>7. Policy on reimbursement and mileage for team members and other volunteers</p>	<p>You may want to use this language:</p> <p>[GROUP NAME] does not reimburse volunteer travel, except through prior agreement in specific circumstances. Volunteer mileage is typically regarded as in-kind contribution to our organization's programs.</p>
<p>8. Policy on using and reimbursing petty cash</p>	



9. Protocol to report acts of fraud committed by team members	<p>You may want to add this language:</p> <p>Clients are advised to use our organization's grievance process if they suspect fraudulent activities by anyone involved in this organization, including meeting with the team leader or contacting EMM to share concerns.</p>
10. Protocol to report acts of fraud committed by supervisor or leadership (include reporting channel, timeline, hierarchy structure, and transparency)	
11. Protocol to report acts of fraud committed by clients	
12. Policy on whistleblowing, including confidentiality, protection against intimidation, discouragement, and retaliation	
13. Any additional policies related to organizational controls	