



## TRAINER COMPLAINT PROTOCOL

On occasion, attendees of training events are dissatisfied with some aspect of the training and choose to register a complaint about the behaviors and practices of an approved trainer with The Nevada Registry. One, in a series of resources available related to the Training Approval System, this document provides clearly stated policies and procedures to be followed in the event that an individual registers a formal complaint and/or in the event that The Nevada Registry becomes aware of a potential issue through their own discovery. It also describes the circumstances under which an individual's status as an approved trainer can be suspended and/or revoked\*.

### Rationale

The protocol is intended to provide trainers with an opportunity for reflection and to support their professional growth by helping them to better align their practice with the expectations outlined in the [Trainer Agreement](#) and the guiding principles of the [Quality Assurance System](#). To ensure that all approved trainers are aware of the process, a copy of this protocol is available on the "[For Trainers](#)" and "[Program Policies](#)" pages of The Nevada Registry website and is referenced within the Trainer Agreement that all trainers are required to accept during each trainer qualification period.

### Framework

The Trainer Complaint Protocol is a four-level complaint process. The requirements that must be met and the action that will be taken by The Nevada Registry at each level increases based on the frequency and severity of the complaint(s) received and range from informational follow-up at Level 1 to permanent termination at Level 4. The Nevada Registry will take every step to verify/substantiate complaints prior to taking formal action and trainers will have the opportunity to respond and provide input about any formal complaint during each step of the process.

### Registering a Complaint

Formal complaints must be submitted within 30 business days of the training in question. If the complaint is received verbally via the telephone, the individual will be asked to submit a formal complaint in writing. Formal complaints can be submitted via fax, mail, email or the [Contact Us](#) form on The Nevada Registry website. The individual will be asked to provide his/her name and contact information in the event that follow up by Registry staff is necessary, and will be provided



assurances about the confidentiality of this process (i.e., his/her name will not be disclosed to the trainer at any time, etc.). While it is preferred that the individual provide his/her name and contact information, anonymous formal complaints will also be accepted. In either case, it is at this point that the feedback is considered a formal complaint.

A written/formal complaint must contain:

1. Name of individual making complaint (optional but will be kept confidential if provided)
2. Contact information of individual making complaint (optional but will be kept confidential if provided)
3. Name of the Trainer
4. Date(s) of the training
5. Title of the training
6. Location of the training
7. Clearly stated statement and description of the complaint/areas of concern

Verbal feedback is not considered a formal complaint. In all instances, if the individual making the complaint is not willing to provide a formal complaint in writing, no further action will be taken.

## **Procedure**

In the event that The Nevada Registry receives a formal complaint regarding the practices of an approved trainer and/or becomes aware of a potential issue through their own discovery (i.e., finding discrepancies on certificates, observing violations of the Trainer Agreement, etc.), staff of The Nevada Registry will initiate the following action(s):

### **LEVEL 1: FIRST Formal Complaint**

Once a **formal** complaint is received/an issue is discovered, a determination will be made as to whether the nature of the complaint appears to be a violation of the Trainer Agreement and/or not aligned with the guidelines of the Quality Assurance System.

1. If the complaint is not related to the Trainer Agreement (i.e., the individual did not like the subject, does not agree with the trainer's teaching style or philosophy, etc.) the feedback will be documented in the trainer's account but no further action will be taken. Professional development support and resources may be provided to the trainer as deemed appropriate by The Nevada Registry.



2. If the nature of the complaint is specifically related to the expectations outlined in the Trainer Agreement, The Nevada Registry Program Director will first attempt to contact the trainer via the telephone to discuss the matter. If the Director is unable to connect with the trainer via the telephone within three business days, an email will be sent to the trainer outlining the details of the alleged complaint with a request to review the Trainer Agreement to ensure that he/she is offering professional development training events in accordance with the expectations outlined within that agreement. Telephone discussions will be followed up with an email outlining the discussion. In either case, this correspondence will be provided for informational purposes. While a formal response is not required at this point, the trainer will be invited to provide any further clarifying information about the complaint and/or to contact The Nevada Registry Program Director directly to discuss the circumstances around the alleged complaint.
3. All communication will be documented in the trainer's account.

## **LEVEL 2: SECOND Formal Complaint**

In the event that a second complaint is received/an issue is discovered, the steps outlined in the above section will be followed in order to obtain a formal complaint in writing (if received via the telephone or otherwise secondhand). Upon receipt of a second **formal** complaint:

1. Staff of The Nevada Registry will attempt to verify/substantiate the complaint through measures deemed appropriate based on the nature of the complaint (i.e., review sign-in sheets, contact training attendees, etc.). **If the complaint cannot be substantiated, no further action will be taken.**
2. If the complaint is substantiated, The Nevada Registry Program Director will contact the trainer via the telephone to discuss the matter. The trainer must provide a written response to the alleged complaint. If the Director is unable to connect with the trainer via the telephone within three business days, an email will be sent to the trainer outlining the details of the alleged complaint with a request to provide a written response to the complaint. Failure to comply with this step will result in a suspension of a trainer's approval status until a written response is received. Training approval requests cannot be submitted during the suspension period and all previously-approved events that have not yet occurred at the time of suspension will be cancelled.
3. The trainer must offer his/her next Registry-approved training session open to the public. The trainer will be provided with professional development resources aimed at supporting and



improving his/her practice (i.e., information on adult learning practices, etc.). Feedback may also be solicited by The Nevada Registry from training attendees to ensure adherence to the expectations outlined in the Trainer Agreement.

4. All communication will be documented in the trainer's account.

### **LEVEL 3: THIRD Formal Complaint**

In the event that a third complaint is received/an issue is discovered, steps will be taken to obtain a formal complaint in writing (if received via the telephone or otherwise secondhand). Upon receipt of a third **formal** complaint:

1. Staff of The Nevada Registry will attempt to verify/substantiate the complaint through measures deemed appropriate based on the nature of the complaint (i.e., review sign-in sheets, contact training attendees, etc.). **If the complaint cannot be substantiated, no further action will be taken.**
2. If the complaint is substantiated, The Nevada Registry Program Director will contact the trainer via the telephone to discuss the matter. The trainer will be asked to provide a written response to the alleged complaint. If the Director is unable to connect with the trainer via the telephone within three business days, an email will be sent to the trainer outlining the details of the alleged complaint with a request to provide a written response to the complaint. Failure to comply with this step will result in a suspension of a trainer's approval status until a written response is received. Training approval requests cannot be submitted during the suspension period and all previously-approved events that have not yet occurred at the time of suspension will be cancelled.
3. A remediation plan will be developed. Within 60 days:
  - a. The trainer must submit a written action plan for ensuring adherence to the Trainer Agreement.
  - b. The trainer will be required to attend **two** Registry-approved professional development training events offered by an ECE 4 Trainer/agency designated by The Nevada Registry (a list will be provided) and to complete a *Training Reflection Exercise*. Both activities are intended to provide the individual with an opportunity to observe the delivery style of another trainer, reflect upon his/her own practice and learn new and effective strategies/techniques to incorporate into his/her own training. The Nevada Registry will make every attempt to designate trainers/agencies with events scheduled in the near future that are being offered at low or no cost; however, should the trainer



choose a fee-based training event, the cost to attend will be the responsibility of the individual.

- c. Deliver one training open to the public in which a Mentor Trainer will attend and conduct an objective observation. The observation notes will be shared with the individual as well as The Nevada Registry Program Director.

*Failure to comply with the steps outlined above will result in a 6-month suspension of a trainer's status as an approved trainer. At the end of the suspension period, all steps listed in this section must be completed within 60 days if the trainer would like to continue as an approved trainer. Failure to do so will result in a permanent termination of a trainer's approval status. If the individual's trainer approval status expires during this 6-month suspension period, he/she will not be eligible to renew as a trainer until the end of the 6-month period regardless of when the next qualification period began.*

4. The trainer's next three Registry-approved events (including the training in which he/she will be observed by a Mentor Trainer) must be open to the public. The trainer will be provided with professional development resources aimed at supporting and improving his/her practice (i.e., information on adult learning practices, etc.). Feedback may also be solicited by The Nevada Registry from training attendees to ensure adherence to the expectations outlined in the Trainer Agreement.
5. All communication will be documented in the trainer's account.

#### **LEVEL 4: FOURTH (AND FINAL) Formal Complaint**

In the event that a fourth complaint is received/an issue is discovered, steps will be taken to obtain a formal complaint in writing (if received via the telephone or otherwise secondhand). Upon receipt of a fourth **formal** complaint:

1. Staff of The Nevada Registry will attempt to verify/substantiate the complaint through measures deemed appropriate based on the nature of the complaint (i.e., review sign-in sheets, contact training attendees, etc.). **If the complaint cannot be substantiated, no further action will be taken.**
2. If the complaint is substantiated, the trainer's status will be placed on suspension and an Ad Hoc Committee of the [Training Approval System \(TAS\) Advisory Workgroup](#) will be convened within 20 business days to review the trainer's file/history of complaints and to make a decision about the trainer's future status as an approved trainer with The Nevada Registry. The members of the Committee will be selected based on the following criteria: a) rotating members of the TAS Advisory Workgroup to serve, b) Committee members' ability



to meet during the established time frame, c) Committee members must not have any professional or personal conflicts of interest with the trainer.

3. The Nevada Registry Program Director will contact the trainer via the telephone to notify him/her that he/she has been placed on suspension effective immediately pending decision by the Ad Hoc Committee and to request a written response to the alleged complaint. A notice of suspension will also be mailed to the trainer's home address on file via certified mail. Training approval requests cannot be submitted during the suspension period and all previously-approved events that have not yet occurred at the time of suspension will be cancelled.
4. The Ad Hoc Committee has three options with regard to the individual's trainer approval status: 1) Short Term Suspension with Mentoring; 2) Suspension with Required Adult Learning Academy (ALA) Participation; and 3) Termination. Their decision will be based on the severity of the complaint, the trainer's complaint history and the feedback received from the Mentor Trainer (identified in Level 3) regarding the trainer's progress and/or compliance.
  - a. Short Term Suspension with Mentoring\*

A temporary suspension of the trainer's status as an approved trainer for a period of 3 months. During this time, the individual will be paired with a Mentor Trainer who will provide support and training. The Mentor Trainer will also attend one of the individual's Registry-approved training sessions and conduct an objective observation using the *Observation Checklist* provided by The Nevada Registry. Feedback from the observation will be shared with the individual as well as with The Nevada Registry Program Director. The individual must submit one request for training approval for this purpose. No other training approval requests can be submitted during the suspension period and all previously-approved events that have not yet occurred at the time of suspension will be cancelled. Failure to comply with this step will result in a termination of a trainer's approval status. This decision is not appealable. Once reinstated, the trainer must deliver all Registry-approved training open to the public for a period of one year from reinstatement date.
  - b. Suspension with Required ALA Participation\*

Requires the individual to participate in the next regularly occurring [Adult Learning Academy](#) (ALA). The ALA Instructor or a Mentor Trainer will attend one of the individual's Registry-approved training sessions and conduct an objective observation using the *Observation Checklist* provided by The Nevada Registry. Feedback from the observation



will be shared with the individual as well as with The Nevada Registry Program Director. The cost to attend the ALA is the responsibility of the trainer. The individual must submit one request for training approval for this purpose. No other training approval requests can be submitted during the suspension period and all previously-approved events that have not yet occurred at the time of suspension will be cancelled. Failure to comply with this step will result in a termination of a trainer's approval status. This decision is not appealable. Once reinstated, the trainer must deliver all Registry-approved training open to the public for a period of one year from reinstatement date.

c. Termination

Permanently terminates the individual's status as an approved trainer with The Nevada Registry.

*\*A reinstated trainer (following a temporary suspension) who receives any further formal complaints after being reinstated will be permanently terminated from The Nevada Registry's Training Approval System.*

5. A letter containing the decision of the Ad Hoc Committee will be sent to the trainer's home address within 10 business days following their decision via certified mail. Only in the case of "c" above may a trainer appeal the decision made by the Ad Hoc Committee in accordance with the established appeals process.
6. All communication will be documented in the trainer's account.

### Final Considerations

Staff of The Nevada Registry, members of the [Registry Advisory Committee](#), the Training Approval System (TAS) Advisory Workgroup and/or individuals otherwise designated by The Nevada Registry, reserve the right to attend any Registry-approved training without prior notice.

The Nevada Registry has an ongoing partnership with Child Care Licensing. Complaints that are regulatory in nature (i.e., fraudulent certificates, etc.) will be shared with Licensing staff as deemed appropriate by The Nevada Registry.

The Nevada Registry reserves the right to bypass the steps outlined in the Trainer Complaint Protocol and immediately terminate a trainer's status for conduct that in the judgment of The Nevada Registry is deemed to pose a direct or indirect risk to health and wellbeing of the trainer, the individuals participating in a professional development training event and/or the children receiving child care services from training attendees.



*\*The Trainer Complaint Protocol applies to trainers in the Generalist, Out-of-State and Corporate Trainer categories only. Approved trainers in the Conference Presenter, Compliance, Sponsored and Organizational Representative trainer categories are not subject to the initial trainer approval and/or annual renewal requirements. For this reason, the Trainer Complaint Protocol will not be applied. In the event that a formal complaint is received regarding a trainer in one of these categories, the sponsoring organization will be responsible for addressing the concern with the trainer(s) prior to sponsoring the individual again. Documentation verifying that this conversation occurred must be provided to The Nevada Registry within 10 business days of the formal complaint. If this documentation is not received within the specified timeline, the sponsoring organization can no longer select this trainer to deliver Registry-approved training. In this instance, The Nevada Registry Program Director will follow up with the individual to inform him/her of the complaint. If the individual receives four complaints (regardless of the sponsoring agency), his/her trainer category will be removed and he/she will no longer be eligible to be sponsored by an organization/agency to offer Registry-approved training.*

*This document may undergo periodic review and revision.*