

Grievance Policy and Procedures

Date approved: July 18, 2019

Purpose

The River Valleys Continuum of Care (MN-502) creates and participates in systems and projects that serve people experiencing homelessness. It is critical that Continuum of Care (CoC) systems and projects respond to the needs the persons served as well as its member organizations. In order to ensure that concerns related to CoC systems and projects are addressed in a transparent, fair, and efficient manner, a process for receiving and responding to grievances should be established.

Household/Participant Grievance Policy

All households served by the River Valleys CoC have the right to file a complaint or grievance if they feel they have been treated unjustly by the Coordinated Entry System (CES) or by any program or agency within the River Valleys CoC.

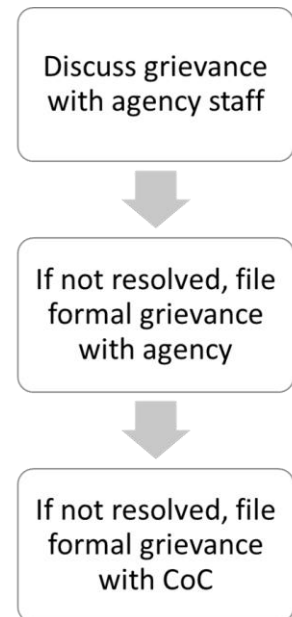
River Valleys CoC expects that all agencies and programs in the River Valleys homeless response system will use their agency's grievance process to ensure that client/participant complaints are dealt with quickly and fairly. Agency and program level grievance procedures are considered an informal grievance process for the CoC. As such, agencies and programs in the CoC are responsible to provide information and assistance to file a formal grievance with the CoC when issues cannot be resolved at the agency or program level.

Informal Grievance Procedure

The River Valleys homeless response system has a participant grievance procedure to ensure that participants' complaints are dealt with quickly and fairly. Participants in programs and participants in CES are given a copy of this grievance procedure and a Grievance Form when the grievance is identified. Staff at homeless-designated housing and/or service programs as well as CES access and assessment sites should explain participants' rights to them and how the grievance procedure works, including that a staff member will help them complete the form and file the grievance if asked.

Steps in informal grievance resolution process:

1. Participant discusses grievance with whomever grievance is against (i.e. service provider agency) and works to resolve grievance informally between the parties involved. When the grievance is about CES, the CES lead staff for the agency should be involved in the conversation if possible.
2. If the grievance is not resolved through this informal process, the participant should file a formal grievance following the agency's grievance process.
3. If the grievance is still not resolved through the agency's formal process, the participant should submit a formal grievance to the CoC Lead Agency following the process outlined on the next page.



Formal Grievance Procedure

For grievances that cannot be resolved informally as described in the previous section, participants may submit a formal grievance to the CoC.

Steps in formal grievance resolution process:

1. Participant completes Grievance Form and submits to CoC Lead Agency. The lead program or CES staff at the agency serving the participant is responsible for assisting participant with the form if asked by the participant.
2. CoC Lead Agency reviews grievance, attempts to substantiate the claims, and routes grievance to the appropriate review committee.
3. The committee then reviews grievance form and any additional information and works to resolve grievance with participant. The committee will confer with the CES Lead Agency, CoC Lead Agency, and other CoC partners as necessary.
4. Committee facilitator will then provide a written response to the grievance within twenty (20) business days of the review. Copies of the response will be forwarded to the CoC Lead Agency within ten (10) business.
5. If participant is not satisfied with response to grievance, participant will be invited to participate in a case conference with staff from CoC Lead Agency, Grievance Review Committee, and other CoC partners as necessary.
6. If participant is not satisfied with results of the case conference, participant can then file grievance with the appropriate funding body, following the grievance procedure of that body (e.g. HUD, MN Housing, etc.).

If the grievance is against the CoC Lead Agency, the Grievance Form should be submitted to a CoC Co-Chair to follow the resolution process above.

All grievances received will be recorded and maintained in CoC files along with details of resolution.

Agency/Program Grievance Policy

All agencies and programs participating in the River Valleys CoC have the right to file a complaint or grievance if they feel they have been treated unjustly by the CoC or by another program or agency within the River Valleys CoC.

River Valleys CoC expects that all agencies and programs in the River Valleys homeless response system will follow CoC expectations for conduct of agencies and programs. Expectations are outlined in CoC policies and procedures (including the Governance Charter, CoC Policy, CoC Member Agreement, CoC Coordinated Entry Partner Agreement, CoC Grantee MOU, etc.), and in funding agreements and any other policy or guide created by the CoC or an applicable program funder for the purposes of ensuring a transparent, fair, and effective homeless response system in the region.

River Valleys CoC also expects that, because the CoC is a community-led entity, most disagreements between agencies and the CoC or between agencies within the CoC should be addressed through either 1) peer-to-peer professional engagement as partners in the same homeless response system or 2) regular CoC decision-making processes for policies and priority-setting.

As such, the Grievance Policy for agencies and programs is limited to resolving the following types of issues:

- Verified conflict of interest violations
- Breach of River Valleys CoC-established policies and procedures

- Technical breach of regulations established by HUD or other applicable funding sources
- Technical error in procedures that is repeated and/or has material impact on agency/program ability to function
- Denial of right to participate in a reasonable manner in CoC decision-making processes

Informal Grievance Procedure

The River Valleys CoC has a grievance procedure to ensure that agency/program complaints are dealt with quickly and fairly. This grievance procedure and a Grievance Form are posted on the CoC website and are accessible to all CoC agency/program participants. Agencies/programs will be directed to this process when the grievance is identified.

Steps for informal grievance resolution:

1. Agency/program staff person discusses grievance with whomever grievance is against (i.e. service provider agency) and works to resolve grievance informally between the parties involved. When the grievance is about CES, the CES lead staff for the agency/ies should be involved in the conversation if possible.
2. If the grievance is not resolved through this informal process, the aggrieved agency/program should submit a formal grievance to the CoC Lead Agency following the process outlined below and inform the other agency's staff and director or other lead contact of the grievance to be filed.

Formal Grievance Procedure

For grievances that cannot be resolved informally as described in the previous section, participants may submit a formal grievance to the CoC.

Steps in formal grievance resolution process:

1. Agency/program completes grievance form and submits to CoC Lead Agency.
2. CoC Lead Agency reviews grievance, attempts to substantiate the claims, and routes grievance to the appropriate review committee.
3. The committee then reviews grievance form and any additional information and works to resolve grievance with the agency/program. The committee will confer with the CES Lead Agency, CoC Lead Agency, and other CoC partners as necessary.
4. Committee facilitator will then provide a written response to the grievance within twenty (20) business days of the review. Copies of the response will be forwarded to the CoC Lead Agency within ten (10) business.
5. If program/agency is not satisfied with response to grievance, agency/program will be invited to participate in a case conference with staff from CoC Lead Agency, Grievance Review Committee, and other CoC partners as necessary.
6. If agency/program is not satisfied with results of the case conference, agency/program can then file grievance with the appropriate funding body, following the grievance procedure of that body (e.g. HUD, MN Housing, etc.).

If the grievance is against the CoC Lead Agency, the Grievance Form should be submitted to a CoC Co-Chair to follow the resolution process above.

All grievances received will be recorded and maintained in CoC files along with details of resolution.

Anti-Retaliation Policy

The River Valleys CoC provides agencies and participants who wish to file a grievance the opportunity to do so without retaliation from the party accused or any representative associated. Retaliation includes, but is not limited to harassment, intimidation, violence, program dismissal, refusing to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract.

The River Valleys CoC will take immediate steps to stop retaliation and prevent its recurrence. These steps may include, but are not limited to:

- Technical Assistance
- Implementing a Corrective Action Plan
- Written report of grievance and retaliation to program funder(s)
- Discontinuing CoC Funding (Decision made at the discretion of the CoC Board)

The CoC Lead Agency will request supporting documentation from the alleged victim of retaliation to substantiate the claims. Supporting documents may include: police reports, emails, and eye-witness statements. If the CoC Lead Agency is the accused party, the CoC Co-Chair will fulfill this role.

River Valleys CoC Grievance Form

Instructions: If you have a complaint/grievance that you would like to file regarding the River Valleys Continuum of Care and/or specific provider please complete the following form. The complaint/grievance will be investigated and a response will be provided within 20 days of committee’s decision.

1. Name of Person Making Complaint: _____ Date of event(s): _____

2. Does your complaint involve a specific provider? If so, please list the agency name.

3. Statement of Complaint – Please provide details of the situation and complaint including any of the specific dates of appointment or conversations and any agencies, programs and/or staff involved. Please remember to include details about your attempts to resolve this issue through informal processes. (If more space is needed, continue to the back of the form or attach another document.)

4. May we contact you for more information? YES NO

5. If yes, please provide contact information.

Primary Phone Number (if available): _____

Email Address (if available): _____

Address (if available): _____

6. What is the best method to contact you? Phone Call Text Email

7. Signature of Person Making Complaint: _____ Date: _____

8. This form can be submitted to

Email to: jprins@threeriverscap.org, with subject line “[project name] Grievance”

Mail to: Jennifer Prins, CoC Coordinator, Three Rivers Community Action, 1414 North Star Drive, Zumbrota, MN 55992

9. If the complaint is against the CoC Lead Agency, please submit the grievance to one of the CoC Co-Chairs.