

## Greater Richmond Continuum of Care Client Grievance Appeal Policy

<b>Policy Title</b>	Greater Richmond CoC Client Grievance Appeal Policy
<b>Date Developed</b>	May 2023
<b>Most recent Date Adopted by Board</b>	
<b>Signed by Board Chair</b>	Annette Cousins

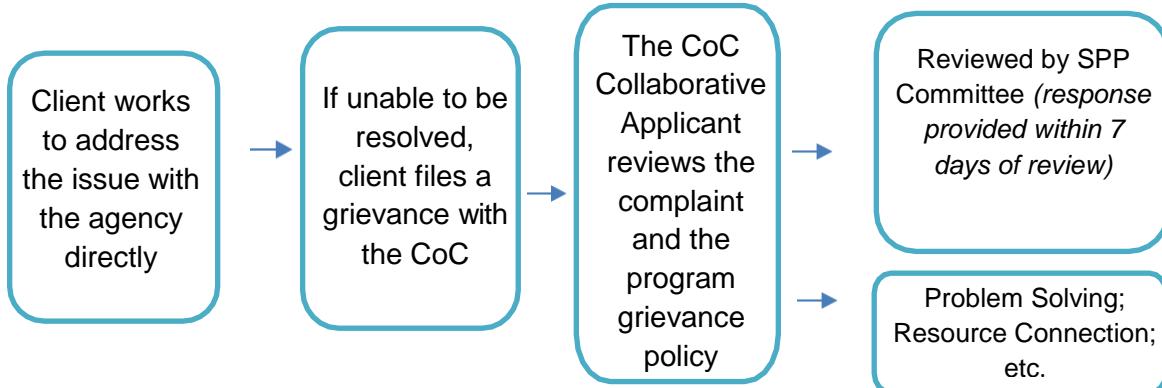
**Policy:** All households served by agencies within the Greater Richmond Continuum of Care (GRCoC) have the right to file a complaint or grievance with any agency within the GRCoC homeless response system if they feel they have been:

- Unjustly denied service through not receiving a referral or being discharged/banned from the program
- Received threats of harm or actual harm to their person or property within the GRCoC homeless response system.

All households must initially file a complaint or grievance through the agency's formal process. The GRCoC grievance appeal process is only enacted when an agency has not followed or properly documented their own grievance policy.

**Overview:** The GRCoC homeless system has a client grievance procedure to ensure that clients' complaints are addressed quickly and fairly. This process is in place for when a client could not resolve a grievance through the agency's formal process. The GRCoC Collaborative Applicant and the System Policy & Process (SPP) Committee Chair receive all grievances. The GRCoC SPP Committee conducts a review for all GRCoC related grievances. Grievance responses are given within 7 days of the SPP Committee's decision.

**Procedure:** Clients are given a copy of the Grievance Policy and a Client Grievance Form when the grievance is identified. Staff at GRCoC agencies, including Coordinated Entry System (CES) staff, should explain clients' rights to them and how the grievance procedure works. If asked, staff member will help clients complete the form and file the grievance.



1. Client discusses grievance (see policy statement for applicable grievances) with current service operator and works to resolve the grievance through the agency's formal grievance process. The client must attempt resolution of the grievance through two staff members at the agency. The service operator must provide the client with documentation of these discussions and their outcomes. If the grievance is not resolved through the agency's formal process, the client may then pursue a grievance appeal with the CoC. Note, a client must have been served in the system within the last three weeks and must have filed a program level grievance within the last 30 days before pursuing an grievance appeal with the CoC. Client completes CoC grievance form (see Addendum C for reference) and submits it through the email or mailing address provided below.
2. The Collaborative Applicant & the SPP Chair review grievance, attempts to substantiate the claims by requesting the program operator's grievance policy and determining if this policy has been followed.
  - If the Collaborative Applicant & the SPP Chair determine the policy has been followed and properly documented, a notice as described below will be issued and the decision is not subject to appeal.
  - If the Collaborative Applicant & the SPP Chair determine the policy has not been followed or properly documented, they will begin the case conferencing component outlined in Addendum B.
  - The CoC may decline to investigate a grievance if it is not an applicable grievance (see policy statement). However, efforts to assist with problem solving, resource allocation, and other forms of resolution may be engaged in.
3. If necessary, the committee then reviews the grievance form and any additional information provided through case conference and works to resolve the grievance with the client. The SPP Committee will confer with the Collaborative Applicant, and other CoC partners, as necessary.
4. The Committee chair will provide a written response to the grievance within seven (7) business days of the review. Copies of the response will be forwarded to the Collaborative Applicant within ten (10) business days, if applicable. All grievance summaries developed by SPP will be reviewed by the Ranking Committee during coordinated funding competitions.
5. After case conference, if the client is not satisfied with the Grievance Review Committee's response to the grievance, they will be given the opportunity to file an appeal. If an agency is not satisfied with the Grievance Review Committee's response to the grievance, they will be given the opportunity to file an appeal. If an appeal is filed, the CoC Grievance Review Committee will provide a written response to the appeal within twenty (20) business days.
6. If the client or agency is not satisfied with results of the case conference or appeal, they can then file a grievance with the appropriate funding body, following the grievance procedure of that body (i.e., HUD, DHCD, etc.).

## Addendum B – Case Conference Procedure

### Overview:

In the context of the GRCoC grievance policy, case conferences are held to assist the two parties to negotiate a resolution to the complaint. The case conference allows all parties to review the claims each side is making, determine where there is agreement, and to see what can resolve the issues in dispute. In essence, case conferences operate as structured problem-solving sessions.

### Procedure:

1. Each party (the client & the agency) is given 10 minutes to share their side of the story to the Grievance Committee and separate from the other party. In this presentation, they are to clearly name their desired resolution for the case conference. This will be timed, and time-signals/warnings will be provided.
  - a. Note: For Case Conferences, the Grievance Review Committee will be made up of the standing committee members and an impartial designee from the Governance Committee. This designee is added to ensure transparency, impartiality, and thorough evaluation of the pending action.
2. At the conclusion of each presentation, a designee from the Grievance Committee will succinctly relay back the main points they have heard the presenter say to ensure they have heard correctly. The presenter will then be given an opportunity to clarify and/or (briefly) add anything that was missed.
3. Also at the conclusion of both presentations, the Grievance Committee will be given 5 minutes to ask any follow-up or clarifying questions. This will also be timed.
4. The Grievance Committee will then be given 10 – 15 minutes to confer internally (separate from the two parties). This discussion will be aimed at the following:
  - a. Identifying and recording areas of overlap/agreement that may be utilized to help build a solution
  - b. Clearly naming and recording the issue(s) in dispute.
    - i. A review of all existing documentation.
  - c. Brainstorm any potential solutions/resolutions to the named issues
    - i. This can include solutions which may require one or both of the parties to compromise/make amends.
    - ii. These potential solutions will be used to guide the conversation when the entire group reconvenes
  - d. Name and record any outstanding questions or concerns
  - e. Develop a plan to assist in mediating a resolution between the two parties
5. The entire group will reconvene. This will be the first time that both parties are in the same space together. The Grievance Committee will be given 5 minutes to ask any additional questions that arose in the internal discussion.
6. The Grievance Committee will then review the areas of agreement and dispute they have identified with the two parties.
  - a. The parties will be given an opportunity to affirm or amend. This process should take no more than 5 minutes.
7. The Grievance Committee will then discuss the potential resolutions with the two parties. This process is meant to be iterative and to assist in finding a mutual resolution. This may require adapting the original proposal or developing an alternative solution.
  - a. Ideally, this section would not exceed 20 minutes. However, as this is the most important element, it may take longer.
  - b. If agreement is reached, the resolution will be documented and signed by both parties.
  - c. If agreement is unable to be reached, the Grievance Committee will determine if another Case Conference will be held or if the matter will need to be escalated to the appropriate funder for further action.
8. A summary of the case conference will be provided to the two parties within 20 days of the session being held.

**Addendum C – Client Grievance Form**  
**GRCoC Continuum of Care**  
**Client Complaint/Grievance Form**

*If you have a complaint/grievance that you would like to file regarding a specific operator, please complete the following form. The complaint/grievance will be investigated, and a response will be provided within 20 business days of the committee's decision.*

*This form is two-sided. **Please fill out both pages.***

1. Name of Person Making Complaint: \_\_\_\_\_ DOB: \_\_\_\_\_
2. HMIS Number (If available): \_\_\_\_\_

*Please use the space below to provide information about your complaint.*

3. Please list BOTH the agency name **and** the specific program your grievance is against. If you do not know the program name, but know the program type (e.g. Permanent Supportive Housing, Shelter, etc.), please list that.

Agency: \_\_\_\_\_ Program: \_\_\_\_\_

4. Date of Complaint: \_\_\_\_\_ Date of event(s): \_\_\_\_\_

5. Have you filed a grievance directly with the agency already? (circle one):      YES      NO

*Note: If you have not taken action with the agency, please do so before pursuing this process at the CoC Level. A link to the grievance policy can be found here or on the GRCoC website (www.endhomelessnessrva.org).*

6. What was the outcome of the action you've taken directly with the agency?

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7. What action do you feel the agency should have taken?

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8. **Statement of Complaint** – Please provide details of the situation and complaint including any of the specific dates of occurrence as well as the agencies, programs and/or staff involved. (If more space is needed, please attach another sheet of paper.)

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9. **Desired Resolution/Response** – What would you like to happen as a result of your complaint?

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10. Do you have a case manager or another support person that you would like us to contact?

(circle one): YES

NO

If yes, name and phone number: \_\_\_\_\_

11. Where are you staying currently? Are you still in the program your grievance is against? \_\_\_\_\_

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*Please provide your contact information so that we can follow up with you – in case we have additional questions and to inform you of the final determination.*

a. Primary Phone Number (if available): \_\_\_\_\_

b. Secondary Phone Number (if available): \_\_\_\_\_

c. Email Address (if available): \_\_\_\_\_

d. Address (if available): \_\_\_\_\_

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12. What is the best method to contact you? (circle): Phone Call Text Email Other: \_\_\_\_\_

13. May we share this grievance form with the agency your complaint is against? (circle): YES NO

***Signature of Person Making Complaint:*** \_\_\_\_\_ Date: \_\_\_\_\_

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This form can be submitted to the CoC Programs Director and the Grievance Review Committee Chair. Submissions may be sent through the following channels:

- a. Email to: [grococgrievance@homewardva.org](mailto:grococgrievance@homewardva.org)
- c. Mail to: 9211 Forest Hill Dr Suite 110 Richmond, VA 23235