



# ***Tri-County Continuum of Care***

## ***for Hunterdon, Sussex, & Warren Counties***

### **Grievance Policy for the Tri County CoC**

Adopted by the Tri-County CoC Board on 08/06/2020

#### **1. Purpose**

The purpose of the Tri-County Continuum of Care Grievance Policy is twofold:

- A. To ensure that there is a fair and accessible process for providers and Board Committee members to file a grievance with the CoC regarding decisions made during the CoC funding process (See Section 5 below).
- B. To ensure that there is a fair and accessible process for consumers served by TRI-COUNTY CoC projects who have filed a grievance with a TRI-COUNTY CoC funded provider, are dissatisfied with the outcome and wish to file a grievance with the CoC (See Section 6 below).

#### **2. Filing a Grievance**

Grievances submitted by consumers, provider agencies, or Board Committee members shall be submitted in writing to the Tri-County Continuum of Care Grievance Committee at [TriCountyCoC@familypromisesussex.org](mailto:TriCountyCoC@familypromisesussex.org) or by phone at 973-579-1180.

#### **3. Composition of Grievance Committee**

The Grievance Committee shall be made up of a minimum of three (3) members of the Tri-County CoC Board. Members shall be appointed by a vote of the Tri-County CoC Board. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee. (see Tri-County CoC Policies, Article VIII, Section 1).

The Grievance Applicant shall be acknowledged and notified of the appointment of a Grievance Committee within three (3) working days of the filing of the grievance complaint.

The Grievance Committee will meet within five (5) working days of receipt of the grievance documentation to review the complaint. The Grievance Applicant may be but, is not required to be present.

After meeting, deliberating, and rendering a decision on the grievance, notification of the grievance decision must be sent in writing, to the grievance applicant and to the Tri-County CoC Board within three (3) working days of the decision.

#### **4. Final review by the TRI-COUNTY CoC Chair**

All Grievance Committee decisions may be appealed to the Tri-County CoC Board Chair within 10 working days of receipt of the Grievance Committee's written decision. In instances in which a Chair recuses, another Board Committee member who was not involved in the

decision being appealed may be appointed to participate in the final review. The final review shall be completed within 15 working days of receipt of the request. Within 10 working days of the review, the Chair shall issue a written decision specifying the reasons for the decision. The written decision shall be mailed to the person who filed the grievance by first class mail, and a copy will be maintained in the Tri-County CoC project file. The decision is final and cannot be appealed.

## **5. Grievance Policy for Providers and Board Members**

This policy should be used when a provider or Board member wishes to file a grievance related to the CoC funding process. For instance, a project may file a grievance to appeal a project evaluation result or the rejection of a project for Tri-County CoC funding.

### **A. Resolution of a Grievance**

Grievances will be reviewed by the Grievance Committee with a determination being made within 30 days of receipt. The committee will issue a written decision, specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request a final review by the Tri-County CoC Board Chair, and provide instructions for requesting the final review, including contact information. The written decision will be sent to the person filing the complaint.

### **B. Limitations on Grievances for Providers and Board Committee Members**

Each year, the Tri-County CoC Board approves the renewal evaluation scoring standards prior to initiating the evaluation. The CoC distributes draft standards in advance and encourages comment. In order to ensure equity, scoring is applied consistently to each program.

The Grievance Committee will not consider grievances based on disagreements with the evaluation standards adopted by the CoC Board. Rather, providers who believe the criteria or performance targets should be adjusted or certain types of projects should be exempted or have different targets should coordinate with their Board representative, attend the relevant Board meeting or submit an email to [TriCountyCoC@familypromisesussex.org](mailto:TriCountyCoC@familypromisesussex.org). The CoC Board will consider all such comments received prior to establishing the annual standards.

Tri-County CoC establishes a standardized process that provides the same opportunity for all projects to make data changes in advance of obtaining the APR data used to evaluate projects. Subsequently, providers are also provided the opportunity to review their preliminary renewal evaluation results, make additional data changes and request that their project be re-scored. Deadlines for each step are distributed and providers receive multiple reminders. In order to ensure equity, deadlines are, generally, applied consistently to each program. Where there are extenuating circumstances that prevent a project from meeting a deadline, the CoC Chair may approve extensions. The Grievance Committee will not consider grievances based on data changes made after the deadline.

## **6. Grievance Policy for Consumers**

This policy can be used by consumers who have filed a grievance related to a Tri-County CoC funded project with a provider agency and who remain dissatisfied with the outcome. Before filing a formal grievance with the CoC Board, a Consumer or agency must first exhaust the internal grievance procedures of the agency against which they are filing the grievance and provide documentation of the results of this grievance procedure prior to filing a grievance with Tri-County CoC Board. Relevant issues may include determinations of service or housing subsidy terminations, repair issues, discrimination, mistreatment, or other disputes or complaints.

Consumers who would like assistance determining which grievance processes are available to them may contact a staff member at the agency at which they receive services or the Tri-County CoC Collaborative Applicant at [TriCountyCoC@familypromisesussex.org](mailto:TriCountyCoC@familypromisesussex.org) or by phone at 973-579-1180.

### **Grievance Committee Hearing Process for Consumers**

When a consumer submits a grievance to the Tri-County CoC Grievance Committee, an information gathering meeting shall be held within 30 working days of the receipt of the grievance. Notification of the information gathering meeting will be given to both parties, not less than 10 days before the scheduled meeting. The notice shall include the date, time, and location of the meeting and a clear statement of the issues to be considered.

Both parties must have the opportunity to be present during the meeting and to hear all oral information and review all written information that is being considered by the Grievance Committee.

A member of the Grievance Committee shall keep a sign-in sheet of all who attended the hearing and a list of the documents presented. If the consumer opts not to attend the meeting, the Grievance Committee may opt to review the grievance and gather all pertinent information via email, phone, or video conference. Such a review must be completed within 30 days of receipt of the grievance.

Within 10 working days of the date of the information gathering meeting or other review process, the Grievance Committee shall issue a written decision specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request a final review by the Tri-County CoC Board Chair, and provide instructions for requesting the final review, including contact information. The written decision shall be sent by first class mail and a copy will be maintained in the Tri-County CoC project file.

## **7. Public Posting of this policy**

All Tri-County CoC funded projects are required to post a copy of this policy in an area that is visible to staff working in and consumers receiving services from the project.