



# Homelessness Solutions in Alameda County

## Office of Homeless Care and Coordination

### Coordinated Entry Grievance Policy

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<i>Approved by</i>	<i>System Coordination Committee</i>
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#### 1. Introduction

This document provides policies and procedures for Alameda County's Coordinated Entry Access Points and OHCC to ensure that any participant may submit a grievance, receive a response and, if necessary, appeal the response related to the provision of Coordinated Entry and Housing Problem Solving services in a consistent, fair and standard manner. This policy also covers requirements for tracking and reporting on grievances and appeals.

#### 2. Definitions

**Access Point** - Access Points are the physical, mobile, or virtual entry points where a person or household experiencing homelessness may receive Coordinated Entry Services including Housing Problem Solving, assessment, links to Navigation and connection to a wide variety of other services.

**Appeal** – an appeal is the elevation of a grievance to OHCC for review by a participant who is dissatisfied with the response to their initial grievance.

**Coordinated Entry** – The Coordinated Entry process is an approach to coordination and management of the crisis response system's resources that allows users to make equity consistent decisions from available information to connect people efficiently and effectively to interventions that will end their homelessness. Coordinated Entry consists of four components: access, assessment, prioritization, and referral.

**Grievance** – a grievance is an expression of dissatisfaction with any aspect of the Housing Problem Solving or Coordinated Entry process. A grievance may, but does not necessarily, allege a failure to follow the prescribed policies, procedures, and practices of Housing Problem Solving and of Coordinated Entry in a consistent and non-discriminatory manner resulting in a negative impact on a participant or potential participant.

**Housing Problem Solving** - Housing Problem Solving is both a practice and a system intervention that works with a participant who is experiencing homelessness or at imminent risk of homelessness to identify options for self-help to resolve the housing crisis without the need for ongoing support from the Housing Crisis Response System.

**Housing Resource Center (HRC)** – a Coordinated Entry Access Point that provides Housing Problem Solving and Coordinated Entry Services in a particular geography. May serve one or more subpopulations.

**Investigation** - an investigation is the process which may be undertaken by OHCC to review a grievance and the result or resolution by an Access Point if a participant appeals a grievance. The investigation may cover both how the grievance was handled and the resolution.

**Non-discrimination** – the requirement to ensure that Coordinated Entry is available to all eligible persons and administered without discrimination based on race, color, religion, nation origin, sex, age, familial status, disability, actual or perceived sexual orientation or marital status. This includes requirements to comply all applicable civil rights and fair housing laws and requirements.

**Participant** – a person who for themselves, or on behalf of a household experiencing homelessness, receives services from the Coordinated Entry system.

**Potential Participant** – a person who for themselves, or on behalf of a household experiencing homelessness, seeks services from the Coordinated Entry system.

### 3. Policy Scope

This Policy applies to all Access Point providers of Housing Problem Solving and Coordinated Entry services including Housing Resource Centers and outreach providers, and covers all populations served with Coordinated Entry.

It operationalizes requirements in the CPD-17-01 Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Access System and relies on additional guidance in the Coordinated Entry Core Elements guidebook and the Outlines for a Continuum of Care’s Coordinated Entry “Policies and Procedures” Document.

### 4. Policy Language

#### 4.1 Purpose

This policy is intended to ensure that participants and potential participants in Coordinated Entry services, including Access, Housing Problem Solving, Assessment, Prioritization or Referral have a consistent and clear ability to file a grievance, receive a response and, if necessary, appeal any aspect of their experience or treatment in a similar manner and timeframe, regardless of where or from what Access Point they receive services.

#### 4.2 Policy

Access Point providers may and should follow their own agency or program procedures for receiving and responding to grievances related to the delivery of Housing Problem Solving and Coordinated Entry services, provided that the applicable procedures:

- are clearly stated and made available to all participants and potential participants;
- allow the participant to file their grievance and have it reviewed or heard by someone who is not the person with whom they have had the experience they are grieving; the person reviewing the grievance and making the determination must be at a higher level within the organization;
- allows participants to receive assistance in making their grievance known including reasonable accommodation;

- include the ability to have an advocate at any meeting or hearing;
- provide for a written response with a determination about the actions alleged and a proposed resolution if warranted, within a set and reasonable period of time, not later than 14 days from receipt of the grievance.

Any participant or potential participant who is dissatisfied with the handling or response to their grievance may appeal to the Health Care Services Agency Office of Homeless Care and Coordination, serving as the Management Entity for Coordinated Entry.

Discrimination complaints can also be directed to the Department of Housing and Urban Development.

Access Points and OHCC shall keep a log of all grievances received, according to the procedures set out below. OHCC will review these logs and the process not less than annually and use the information to recommend refinements and improvements in the process and delivery of services.

## **5. Procedure**

- 5.1 All Access Points will provide participants and potential participants with information about how they may file a grievance. This information should be made available at time of enrollment or of being denied enrollment in Coordinated Entry or Housing Problem Solving and should also be posted prominently at the Access Point location if the location is physical.
- 5.2 Access Points will follow their procedures and document the results of any grievances received and actions taken in accordance with their internal procedures and supervision, provide these reflect the above required elements in 4.2.
- 5.3 Access Points will notify participants and potential participants at the time of their final response that if they are dissatisfied with the result they may appeal by contacting OHCC by phone, mail, or email. OHCC will provide contact information to all Access Points to enact this policy. Access Points must also inform participants and potential participants that they may file a discrimination complaint directly with HUD.
- 5.4 OHCC will respond to all appeals within 10 business days and will provide participants with a finding as to whether the process was duly followed and concluded and no appeal is appropriate, or whether there will be an investigation.
- 5.5 OHCC may consult with Access Points as they investigate and Access Points will share with OHCC any information they have collected regarding the grievance and will participate in any hearings or meetings called to review the result.
- 5.6 OHCC will provide a written determination of whether the grievance was appropriately handled and responded to and will either uphold the Access Point determination or initiate an investigation which may result in a upholding the determination or issuing a different decision and proposed resolution.
- 5.7 Access Points and OHCC will maintain a log of all complaints or grievances received regarding any aspect of Problem Solving or Coordinated Entry. This log must at minimum record:
  - a. When the grievance was first received;

- b. the primary concern or topic raised in the grievance and which aspect of Coordinated Entry (Access, Housing Problem Solving, Assessment, Prioritization, Referral or something else) the participant was concerned with;
  - c. whether the grievance included a concern regarding of discrimination, and what type of discrimination was cited.
  - d. when it was responded to;
  - e. what finding was made and what action was taken.
- 5.8 The Access Point log should be kept updated, with each step recorded within 48 hours of its conclusion. OHCC may request to review the log at any time and will review not less than annually as part of the Coordinated Entry evaluation and policy review process.

## **6. Policy Location**

This Policy will be maintained by OHCC on a publicly accessible website. Access Point providers should make the policy available to participants and other interested parties.

## **7. References, Related Resources, or Appendices**

The HUD office of Fair Housing and Equal Opportunity online complaint portal [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/online-complaint](https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint)