

Homeless Management Information System (HMIS) Grievance Policy and Procedure

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Overview

Grievance Policy and Procedure Overview

The purpose of the Homeless Management Information System (HMIS) Grievance Policy and Procedure is to ensure that participants have a clear, fair, and accessible process to raise concerns related to their HMIS data and how it is handled. This policy is guided by principles of transparency, accountability, privacy, and respect for participant rights. HMIS is a system-level tool that supports the homeless system of care, and this grievance process is intended to address issues related to data access, accuracy, privacy, and security in a consistent and participant-centered way.

For more information about grievance policies and procedures in general, please review the EveryOne Home Grievance Policy and Procedure Frequently Asked Questions (FAQ).

Homeless Management Information System (HMIS)

The Homeless Management Information System is a local information technology system used to collect participant-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. Every Continuum of Care (CoC) is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. In Alameda County, the HMIS software is called Clarity.

HUD HMIS Data Standards:

- [FY 2026 Interactive HMIS Data Standards Tool](#)
- [FY 2026 HMIS Data Standards Manual \(PDF\)](#)
- [FY 2026 HMIS Mapping Instructions \(XLSX\)](#)
- [Data Collection Requirements for Transition to FY 2026 Data Standards \(PDF\)](#)
- [FY 2026 Zip Code to Geography Crosswalk \(XLSX\)](#)
- [Federal Partner Participation \(HTML\)](#)

Alameda County HMIS Policies and Procedures:

- [Alameda County HMIS Privacy Policy](#)
- [Alameda County Security Policy](#)
- [Organizational Privacy Notice](#)
- [FAQ: Privacy and Security Policies](#)
- [Informed Consent Tips](#)

Roles and Responsibilities

HMIS Lead Roles and Responsibilities

Alameda County Health, Housing and Homelessness Services (H&H) is the HMIS Lead in Alameda County. The HMIS Lead is the designated entity chosen by the CoC to be responsible for managing and operating HMIS. The HMIS is responsible for system setup, data quality, user training, and reporting to HUD. They are the central authority for implementing HMIS policies and ensuring compliance with federal standards and supporting local service providers.

HMIS is an information technology system used by a CoC to collect, analyze, and store client-level data and data on housing and service provision for individuals experiencing or at risk of homelessness within a geographic area. The CoC is responsible for selecting an HMIS software system that complies with HUD standards ([24 CFR 578.7\(b\)](#)). Additionally, the CoC must select an eligible entity to serve as HMIS Lead Agency and manage the HMIS on the CoC's behalf. In this role, the [HMIS Lead Agency](#) is responsible for:

- Administering the system;
- Hosting and maintaining HMIS software or data;
- Backing up, recovering, and repairing HMIS software or data;
- Integrating and warehousing data, if applicable;
- Upgrading, customizing, and enhancing the HMIS to better support community needs;
- Training providers on how to use and operate the HMIS;

- Technical assistance and support for end users to address issues or challenges when using the HMIS;
- Monitoring and reviewing systemwide data quality and completeness;
- Providing timely and accurate reports to providers, the CoC, and HUD; and
- If the CoC has a victim service provider(s), supporting the establishment and operation of a HMIS-compliant comparable database.

Although it is the CoC's responsibility to manage the following activities, many CoCs delegate the following to the HMIS Lead Agency:

- Review and revise privacy, data quality, and security plans (typically in association with a subcommittee designated to support this effort) – these plans are then approved by the CoC;
- Ensure participation of all CoC- and Emergency Solutions Grant-funded (ESG-funded) projects in the HMIS, and encourage non-HUD funded homelessness service providers to participate in the HMIS, which will help provide comprehensive data for the community; and
- Maintain compliance with HUD system requirements.

To learn more about HMIS Lead Agencies and their roles within a CoC, view the [HMIS Lead Series](#).

HUD CoC-Funded Program Roles and Responsibilities

Participation in the HMIS by CoC Program recipients and subrecipients is found in the HUD CoC Program interim rule, at [24 CFR § 578.7\(b\)\(4\)](#).

The regulation states that the CoC must:

“Ensure consistent participation of recipients and subrecipients in the HMIS.”

This regulatory requirement is further supported by explanatory text in the Federal Register, which clarifies the mandatory nature of HMIS participation under the HEARTH Act, [stating](#):

“With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of the Continuum of Care (CoC) Program and Emergency Solutions Grants (ESG) funds.”

For most providers, participation involves using the HMIS designated by the local CoC. However, a specific exemption exists for victim services providers, who may use a comparable database that adheres to HUD's HMIS requirements to protect client confidentiality, as detailed in 24 CFR § 578.57(a)(3).

Grievance Policy

A **grievance** is an official statement of a complaint about something you believe is wrong or unfair, with the potential for formal action to resolve the grievance.

A **grievance policy** is written rules for HUD CoC-funded programs, Coordinated Entry, and HMIS entities about what standards they must meet for grievances.

A **grievance procedure** is the step-by-step process of putting the policy into practice.

For more information about grievance policies and procedures in general, please review the EveryOne Home Grievance Policy and Procedure Frequently Asked Questions (FAQ).

The HMIS Grievance Policy and Procedure covers any issue with HMIS that a participant has been unable to resolve with the program entering the information into HMIS, including data access, data entry, privacy, and data usage. Examples of grievances covered by this Policy and Procedure include:

- **Access to Records:** Grievances related to access may include when a participant has requested copies of their HMIS records, but the program has refused to provide them.
- **Data Entry Corrections:** Grievances related to data entry corrections may include corrections to a name, date of birth, or other Universal Data Elements. Corrections other types of data, such as case notes, can only be made at a program level and cannot be changed by the HMIS Lead.
- **Data Privacy:** Grievances related to data privacy or security may include concerns about unauthorized access, data sharing, or suspected data breaches.

Not all complaints or concerns related to homelessness services fall within the scope of an HMIS grievance. Issues related to service quality, program rules, staff conduct, eligibility decisions, or housing placement decisions are generally program-level matters and should be addressed through the program's own grievance policy and procedure. The HMIS Grievance Policy and Procedure is limited to concerns specifically related to HMIS data and HMIS practices that could not be resolved with the program directly.

Because HMIS data is entered and managed by participating programs, most concerns are best addressed first at the program level. This policy is designed to complement, not replace, program grievance procedures. If a participant has a grievance that is not included in the HMIS Grievance Policy and Procedure, the participant should consult with the EveryOne Home Grievance Policy and Procedure Frequently Asked Questions (FAQ). The FAQ will provide guidance how to find the right policy to address their type of grievance.

Grievance Procedure

Informal Resolution

Before filing a grievance with HMIS, the participant should attempt to resolve the problem with the program directly. For example, asking the program to provide the participant with their HMIS records or make data corrections.

HMIS will generally review grievances only after a participant has attempted to resolve the issue with the program, unless the concern involves system-level issues that cannot reasonably be addressed by the program alone.

The participant should do their best to document:

- How they attempted to resolve the problem with the program,
- What response they received or what was the outcome of the attempt, and
- Any additional relevant information, such as who they spoke with or when the conversation took place.

Filing a Grievance

If the participant is not able to resolve the problem informally, the participant may file a grievance.

Please consult the scope of this policy in the section above. If the type of grievance *is* listed in the policy scope, the participant may file a grievance with HMIS by completing the included HMIS Grievance Form and emailing it to: hmissupport@acgov.org.

If the type of grievance *is not* listed in the policy scope, then the participant may file a grievance with the program. To identify the program's grievance policy and procedure, please review the EveryOne Home Grievance Policy and Procedure FAQ.

Reasonable Accommodations for Filing a Grievance

Participants may request reasonable accommodations or assistance in filing or pursuing an HMIS grievance. This may include help completing forms, language interpretation or translation, alternative formats, or other accommodations related to disability or access needs. HMIS aims to ensure that the grievance process is accessible to all participants, regardless of language, ability, or housing status.

Grievance Review

HMIS is committed to responding to grievances in a timely and consistent manner. Upon receipt of a grievance, participants will receive confirmation that their grievance has been received, followed by a review and written response within a defined timeframe. Clear service standards help ensure transparency, predictability, and accountability in how grievances and appeals are handled, while allowing flexibility when additional investigation is needed.

Grievances submitted under this policy will be reviewed by the HMIS Lead or their designee, based on the nature of the concern. The review process may include consultation with the program involved, review of HMIS records, and consideration of applicable policies and regulations. The HMIS Lead or their designee may reach out to request specific dates, documents or details to ensure that they have all necessary information to follow their internal protocols accurately.

Decisions will focus on whether HMIS policies and procedures were followed and what corrective actions, if any, are appropriate.

Grievance Response

Depending on the nature of the grievance and the findings of the review, one or more of the following resolutions may be issued:

- Identification of the grievance as outside the scope of HMIS, with referral to the appropriate program or grievance process.
- Confirmation that HMIS policies and procedures were followed and no corrective action is required.
- Correction of inaccurate or incomplete Universal Data Elements, such as name or date of birth, when permitted under HMIS rules. Please note additional documentation may be required.

- Direction to the program to correct data entry errors that must be addressed at the program level.
- Provision of copies of the participant's HMIS records, consistent with privacy and security policies.
- Clarification or explanation of HMIS policies, data practices, or participant rights.
- Referral of the issue to the participating program for required follow-up or corrective action.
- Additional staff training or technical assistance for a program related to HMIS data entry, privacy, or security requirements.
- System-level review or process improvement to prevent similar issues in the future.
- Identification of a potential privacy or security concern and initiation of appropriate investigation and mitigation steps.

Participants will receive a written notification of the response to their grievance within seven (7) business days. The response will be sent by email.

Appeal Procedure

Filing an Appeal

An **appeal** is the elevation of a grievance for review by a participant who is dissatisfied with the response to their initial grievance. A participant is entitled to have any response to their grievance reviewed.

To file an appeal, complete the included HMIS Grievance Appeal Form and email it to: hmissupport@acgov.org. Alameda County Health, Housing and Homelessness Services (H&H) is responsible for HMIS oversight. The appeal will be reviewed by H&H Senior Leadership, such as the Division Director, Deputy Director or Director of H&H. The appeal will *not* be reviewed by the person who reviewed and responded to the original grievance.

The appeals must be filed within thirty (30) calendar days of the Grievance Response being sent to the participant.

H&H Review

H&H will respond to all appeals within ten (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.

H&H may consult with programs as they investigate, and programs will share with H&H any information they have collected regarding the grievance and will participate in any hearings or meetings called to review the result.

H&H will provide a written determination of whether the grievance was appropriately handled and responded to and will either uphold the original determination or initiate an investigation which may result in upholding the determination or issuing a different decision and proposed resolution.

Record Keeping and Evaluation

Record Keeping

The HMIS Lead will maintain a log of all complaints or grievances received regarding any aspect of HMIS. This log must at a minimum record:

- When the grievance was first received;
- The primary concern or topic raised in the grievance and which aspect of HMIS the participant was concerned with;
- Whether the grievance included a concern regarding discrimination, and what type of discrimination was cited;
- When it was responded to; and
- What finding was made and what action was taken.

The Grievance Log should be kept updated, with each step recorded within seven (7) calendar days of its conclusion.

H&H may request to review the log at any time.

Record Review and Evaluation

H&H will review HMIS grievances and appeals information at least annually. The information will be reviewed in the aggregate to identify trends, training needs, or opportunities for system improvement. This information may inform updates to HMIS policies, procedures, and guidance, as well as annual HMIS evaluations. The goal is to

use feedback from grievances not only to resolve individual concerns but also to strengthen the HMIS and the system of care overall.

Discrimination and Protection from Retaliation

Discrimination Grievances

A discrimination grievance is when someone has discriminated on you based on a protected status.

Discrimination complaints can be made using the HMIS Grievance Policy and Procedure. Discrimination grievances can also be submitted to the U.S. Department of Housing and Urban Development (HUD) by completing an [online form](#), by calling 1-800-669-9777, or by printing and completing a [form](#) and mailing it to San Francisco Regional Office of FHEO, U.S. Department of Housing and Urban Development, One Sansome Street Suite 1200, San Francisco, CA 94104.

For more information about how to report discrimination to HUD, please visit [HUD's website](#).

Protection from Retaliation

Participants will not be subject to retaliation for filing a grievance or appeal related to HMIS. Filing a grievance will not affect a participant's eligibility for services or housing, nor their relationship with a program. This protection is intended to ensure participants feel safe raising concerns about their data without fear of negative consequences.

Key Terms

- **Alameda County Health, Housing and Homelessness Services (H&H):** Alameda County department responsible for HMIS oversight.
- **Appeal:** The elevation of a grievance for review by a participant who is dissatisfied with the response to their initial grievance.
- **Clarity:** The name of the HMIS software used in Alameda County.
- **Complaint:** An expression of dissatisfaction. A complaint can be informal and may not require formal action.

- **Continuum of Care (CoC):** The planning body in a community that addresses homelessness and the system of services and housing interventions for households experiencing homelessness.
- **EveryOne Home:** The name of the Oakland, Berkley/Alameda County Continuum of Care (CoC).
- **Grievance:** An official statement of a complaint about something you believe is wrong or unfair, with the potential for formal action to resolve the grievance.
- **Grievance Policy:** Written rules for HUD CoC-funded programs, Coordinated Entry, and HMIS entities about what standards they must meet for grievances.
- **Grievance Procedure:** The step-by-step process of putting the policy into practice.
- **Homeless Management Information System (HMIS):** A local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness.
- **HMIS Lead:** The designated entity chosen by the CoC to be responsible for managing and operating HMIS. The HMIS is responsible for system setup, data quality, user training, and reporting to HUD. They are the central authority for implementing HMIS policies and ensuring compliance with federal standards and supporting local service providers. Alameda County Health, Housing and Homelessness Services (H&H) is the HMIS Lead in Alameda County.
- **Participant:** A person who for themselves, or on behalf of a household experiencing or at risk of homelessness, has data entered into HMIS.
- **Universal Data Elements (UDEs):** Essential, standardized client-level data points required for all projects in HMIS to create unique participant profiles, track homelessness, and enable system-wide reporting. UDEs include name, date of birth, and basic demographics.

For more information about key terms and acronyms, please visit the [EveryOne Home Acronym Glossary](#).

Alameda County Homeless Management Information System (HMIS) Grievance Form

Participant Information

Participant Name: _____

Participant Phone Number: _____

Participant Email Address: _____

It is important to provide current contact information so we can respond to your grievance. If your contact information changes, please notify us at your earliest opportunity by emailing hmissupport@acgov.org.

Grievance Information

Program Name: _____

List the program you have been working with to resolve this issue.

Program Contact: _____

Contact Information: _____

List the name and contact information for the person you have been working with to solve this issue.

First Date of the Issue: _____

Does this Issue Involve:

- Access to HMIS Records
- Data Correction
- Data Privacy and Usage
- Discrimination
- Other

Description of the Issue:

Please use the space below to describe your issue. Attach additional pages as needed.

Participant Signature: _____

Date: _____

Email completed form to hmissupport@acgov.org.

Alameda County Homeless Management Information System (HMIS) Grievance Appeal Form

Participant Information

Participant Name: _____

Participant Phone Number: _____

Participant Email Address: _____

It is important to provide current contact information so we can respond to your appeal. If your contact information changes, please notify us at your earliest opportunity by emailing hmissupport@acgov.org.

Grievance Information

Program Name: _____

List the program you have been working with to resolve this issue.

Does this Issue Involve:

- Access to HMIS Records
- Data Correction
- Data Privacy and Usage
- Discrimination
- Other

Description of the Issue:

Please use the space below to describe your issue. Attach additional pages as needed.

Appeal Information

Have You Received a Grievance Resolution?

- Yes
- No
- I Don't Know

Reason for Appeal:

Please use the space below to describe why you disagree with the Grievance Resolution. Attach additional pages as needed.

Participant Signature: _____

Date: _____

Email completed form to hmissupport@acgov.org.