



St. Louis City Continuum of Care Grievance Policy

1. DEFINITIONS

- a. CoC: The CoC is the St. Louis City Continuum of Care for homelessness.
- b. CoC Funded Agency: A CoC Funded Agency is any entity currently receiving funding through one or more St. Louis City CoC grants.
- c. CoC Member: An entity or person that is a member of the CoC, including CoC Funded Agencies.
- d. Collaborative Applicant: The Collaborative Applicant is the entity designated by the CoC to collect and submit the CoC consolidated application to HUD, and charged with monitoring compliance with CoC grant agreement. Currently, the Collaborative Applicant is the St. Louis City Department of Human Services.
- e. Consumer: A Consumer is any individual who is, has, or is attempting to receive services or support from a CoC Funded Agency.
- f. Consumer Grievance: A Consumer Grievance is a Grievance brought by a Consumer, or on behalf of a Consumer, related to a CoC Funded Agency's actions or inactions that adversely impact a Consumer or Consumers' rights, welfare, or status.
- g. Grievance: A Grievance is defined as any dispute between an individual or agency and a CoC Funded Agency, arising out of the CoC Funded Agency's failure to act in accordance with the CoC's governing documents or standards (including the governance Charter, the Coordinated Entry Manual, and other CoC policies and procedures), or arising out of conduct that adversely affects an individual Consumer's rights, welfare, or status. The grievance procedure is applicable only to discrete issues and should not to be used as a forum for initiating policy changes in the CoC.
- h. Non-CoC Funded Agency Grievance: A grievance against a CoC Member that is not a CoC Funded Agency.
- i. Non-Consumer Grievance: A Non-Consumer Grievance is a Grievance brought by any individual or entity arising out of a CoC Funded Agency's conduct, which does not relate to Consumer rights, welfare, or status.

This grievance procedure shall not apply to:

- a. Grievances involving neither a CoC Funded Agency nor a CoC Member;
- b. Grievances related to a CoC Funded Agency's compliance with the terms of its grant agreement with the Collaborative Applicant or other contractual obligations, unless the Grievance is filed by or on behalf of a Consumer or Consumers;
- c. Grievances filed by an employee or volunteer of a CoC Funded Agency regarding the agency's actions or inactions related to the employee or volunteer;
- d. Any issue that has been previously decided in another proceeding, including a previously filed and resolved Grievance or an issue that has been decided through legal processes; or
- e. Any Grievance that is pending before a court of law.

2. GRIEVANCE POLICY

The CoC is committed to providing a transparent process to address problems as they arise in CoC Funded Agencies, as well as CoC Members. All Consumers should feel comfortable that their complaints will be addressed promptly, fairly, and without fear of retaliation. Problems are best addressed as close to the source as possible, and the CoC encourages resolution of problems through internal processes. All CoC Funded Agencies are expected to maintain internal grievance processes that ensure prompt and fair attention to issues as they arise, and that guard against retaliation. To the extent issues are not able to be resolved within individual agencies, the CoC has established this policy to govern how Grievances may be brought to the CoC.

- a. The CoC will post this policy on the CoC website, along with a fillable Grievance form and information about how to submit Grievances through other methods.
- b. All CoC Funded Agencies must have an internal grievance policy in place that (1) provides for an initial response to all grievances within two working days, (2) explicitly ensures that no retaliation or loss of services will result from filing grievance, and (3) notifies Consumers of their right to file a Grievance with the CoC. They must also have Grievance forms available for Consumer use.
- c. All CoC Funded Agencies must post Civil Right Enforcement Agency (CREA) and/or Equal Housing Opportunity Commission (EHOOC) notices in locations where Consumers are likely to see them.
- d. All CoC Members are encouraged to comply with the requirements listed in subparts B and C above. All CoC Members are required to comply with the CoC Member Qualifications, Duties and Responsibilities, and the CoC will enforce compliance to the extent a grievance indicates that a CoC Member has failed to comply.

3. PROCEDURE

- a. Any person wishing to file a Grievance with the CoC may do so by (1) filling out the fillable Grievance form at the following website: <https://cocstl.org> (2) obtaining a Grievance form from a CoC Funded Agency and delivering it to the Chair of the Governance and Membership Committee in-person, via mail, or via e-mail; or (3) calling the Chair of the Governance and Membership Committee. Unless it would be futile to do so, people must first attempt to resolve the Grievance internally with the CoC Funded Agency against whom the Grievance is filed, as soon as possible after the event in question occurred.
 - i. Consumers wishing to file a Grievance may alternatively submit grievances to the CoC Consumer At-Large Board Member in-person, via e-mail, or via phone

- ii. Any CoC member who is approached by someone wishing to file a Grievance should provide them with a grievance form and refer them to the Governance and Membership Chair or the Consumer At-Large Board Member, as appropriate.
- b. The CoC representative will contact the person filing a Grievance within 2 working days to acknowledge receipt of the Grievance and to document the basic facts. The CoC representative will determine if the Grievance is appropriate to be resolved through the CoC process. If it is not, the CoC representative will assist in making a proper referral.
- c. If the CoC representative determines that the Grievance is properly brought to the CoC, the representative will gather relevant information from the person filing the Grievance and the CoC Funded Agency. Based on the facts and any supporting documentation, the CoC representative will take steps to resolve the Grievance, including but not limited to: resolving the Grievance immediately; interviewing further people; arranging a meeting of the CoC representative, the person filing the Grievance, and the agency against which the grievance was filed to attempt to reach a mutually agreeable resolution. If no mutually agreeable resolution is possible, the CoC representative will call a special meeting of the Governance and Membership Committee to determine a proper resolution to the Grievance. Matters may be resolved within the Governance and Membership Committee, or may require referral or reporting to the Collaborative Applicant, the CoC Board, or another outside party. At all times, the CoC representative will keep the person filing the Grievance aware of the progress of the Grievance.
- d. The CoC representative will inform the person filing the Grievance of the resolution of the Grievance, and will involve the person in the resolution to the extent this is possible and appropriate. The CoC representative will advise the person filing the Grievance of their right to be free from retaliation, and should advise them to report any retaliation they encounter.
- e. If the person filing the Grievance is not satisfied with the outcome of the Grievance, they may appeal to the CoC Board of Directors by informing the Chair of the Governance and Membership Committee, the Consumer At-Large Board Member, or the Chair of the CoC.
- f. With respect to Non-CoC Funded Agency Grievances, the CoC will receive grievances and will respond within 2 working days to any grievance. The CoC will process the grievance to determine whether the CoC Member has not complied with CoC Member Qualifications, Duties and Expectations, and will take appropriate action in accordance with the CoC Governance Charter and CoC procedures. The CoC will also provide basic guidance on other avenues for addressing a grievance not involving a CoC Funded Agency.

4. REPORTING

The Governance and Membership Committee will provide the following information to the Collaborative Applicant and the Program Performance Committee on a quarterly basis: (1) the

number of Grievances received in the quarter and in that calendar year; (2) the agency against whom the Grievances were filed; (3) the general nature of the Grievance; (4) and the resolution of the Grievance.

The Governance and Membership committee will share only general, non-identifiable trends regarding grievances with the CoC Board and general membership, except in the instance when a Grievance is appealed to the CoC Board. Board discussions regarding a Grievance should be held in a closed, executive session.

5. TRAINING

The Governance and Membership Committee will propose further trainings or policies/procedures to address problems identified through grievance process.

GRIEVANCE FORM

Name of Person or entity filing complaint:

Name of CoC Funded Agency or CoC Member complained against:

I have attempted to address this complaint with the agency:

Y/N

If No, would talking to the agency be futile?

Y/N

COMPLAINT:

Who at the agency was the grievance first reported to? Please provide name and contact information if you have it (documentation is not required):

What date was the grievance first made?

What was the resolution of the grievance? Please provide written documentation if you have it.

ADDRESS: _____

TELEPHONE NUMBER: _____

E-MAIL: _____

COMPLAINANT'S REPRESENTATIVE, if any: _____

Submit to:

Laura Toledo
Chair of the Governance and Membership Committee
Center for Women in Transition
7525 South Broadway, St. Louis, MO 63111
e-mail: luratoledo@cwitstl.org
tel: 314-771-5207

or (Consumer complaints)

Virginia Shelton
CoC Consumer At-Large Board Member
e-mail: homelessabsolutecare@gmail.com
tel: 314-724-3158