

MD Balance of State Continuum of Care Grievance and Appeals Policy

Approved November 22, 2024

I. Purpose of the Policy

The purpose of the MD BoS CoC Grievance procedure includes the following:

- a. To emphasize that the Balance of State CoC prefers that all grievances be resolved at the lowest level possible. Meaning, grievances should first be addressed with the local organization or program, if there is no resolution, the grievance should then escalate to the Local Homelessness Coalition (LHC). If, at that time, a resolution has still not been identified, a grievance should be escalated to the CoC level.
 - i. Filing a grievance with the BoS CoC should be considered a means of last resort when issues cannot be resolved locally.
- b. To ensure that a fair and accessible process exists for individuals and households served by the CoC who are dissatisfied with the outcome of a grievance filed at the local level and wish to appeal the decision with the BoS CoC.
- c. To ensure that a fair and accessible process exists for CoC partners and interested parties to file grievances with the BoS CoC when a relevant party is disregarding the CoC Code of Conduct Policy or other CoC Policies as outlined in the MD BoS CoC Governance Charter; and is unable to be resolved at the local level.
- d. Grant authority to the CoC Grievance Committee:
 - i. To make final decisions and recommend solutions that are reasonable, within the typical scope of CoC activities and do not use grant funds for unauthorized purposes or otherwise violate CoC and HUD policy.
 - ii. Recommend corrective actions that may be incorporated into agency records for programs that fail to follow through with recommended solutions.
- e. To clarify that this policy is applicable to the Balance of State CoC grievance process only. Local providers, organizations and Local Homelessness Coalitions

must establish their own grievance policies, procedures and protocols and are considered independent from this CoC level policy.

II. Grievance Policy for CoC Program Participants

CoC Program Participants may submit a grievance related to a MD BoS CoC participating organization when there is dissatisfaction with the outcome of the assistance applied for from the provider agency. In this circumstance, a CoC Program Participant is an individual or household who is currently or previously receiving services, or is attempting to receive services, with a CoC participating organization.

Participant grievances must first be addressed with the local organization prior to filing a grievance with the LHC or the MD BoS CoC. If the participant does not agree with the organization's decision, they may submit a grievance with the LHC and lastly with the MD BoS CoC.

Participants who need assistance with the grievance process are encouraged to first contact a staff member at the agency at which they receive services or MD BoS staff via the [CoC Help Desk](#) (select "CoC Grievance Form").

Grievance Process for CoC Program Participants

- a. CoC participant grievances should be addressed at the lowest level possible: the first attempt at resolution should be addressed with the project or organization , the second attempt should be with LHC Leadership or other locally designated party and lastly to the BoS CoC Grievance Committee for a final decision.
 - i. Organizations and LHCs should refer to the CoC Written Standards for additional guidance on developing best practice grievance procedures.
- b. Grievances received by the CoC will be provided to the CoC Governance Committee within five business days of receipt. The Grievance Committee will review the grievance materials and issue a written decision, including specific

reasons for decision and any actions that need to occur, within 45 days of receipt.

- i. The written decision will be mailed or emailed to all parties involved in the grievance.
- c. The CoC Grievance Committee has the authority to request additional information, as needed, to make a final decision, including, but not limited to: interviews, agency policies, case notes, client files and any additional relevant documentation.
- d. When requested by the CoC Grievance Committee, a hearing shall be held in person or via virtual video conference. If a hearing is requested, then:
 - i. A Hearing Notice will be sent via mail and/or email, if applicable, no less than 10 days before the scheduled hearing to all involved parties. The notice will include the date, time and logistics of the hearing and a clear statement of the issues to be considered.
 - ii. All parties implicated in the grievance must be given the opportunity to be present during the hearing and to hear all oral information and review all written information that is being considered. The individual filing the grievance may also bring a person of their choice to assist during the hearing. Those needing assistance to identify someone who can assist during the hearing may contact MD BoS CoC staff via the [CoC Help Desk](#) (select “CoC Grievance Form”).
 - iii. CoC staff will keep minutes of the hearing, including a list of attendees, a list of documents presented and specific actions taken. If the person filing the grievance chooses not to attend the hearing, the committee may opt to review the grievance and gather all pertinent information via email, phone or virtual video conference.
 - iv. The CoC shall issue a written decision within 10 working days of the hearing that will include a clear explanation specifying the reasons for the decision and any actions that need to be taken.

- v. The CoC Grievance Committee maintains the right to make a final decision based on any documentation provided and without a hearing.

III. Limitations on Grievances

- a. If the grievance is related to issues with the coordinated entry process, the grievance should be forwarded to the relevant local CE Lead and handled according to the procedures outlined in the CES Policy Guide.

IV. **Grievance Policy for CoC Partners and Interested Parties**

This policy and procedure should be used when a CoC partner wishes to file a grievance related to inappropriate behavior including, but not limited to: bullying, harassment and conflicts of interest from another CoC partner. In this context, partners include employees, volunteers, advocates or community members who participate in the CoC through homeless service providers, victim service providers, faith-based organizations, schools districts, social service providers, mental health providers, hospitals, universities, affordable housing developers, law enforcement, or other contributing organizations.

Grievance Process for CoC Partners

- a. The first attempt to resolve a grievance should always be held at the local level by way of individual conversations or via the LHC Grievance Policy, LHC Committees and/or local leadership, before escalating to the BoS CoC Grievance Committee for a final decision.
 - i. Agencies and LHCs should refer to the CoC Written Standards for additional guidance on developing best practice grievance procedures.
- b. Grievances received by the CoC will be provided to the CoC Governance Committee within five business days of receipt. The Grievance Committee will review the grievance materials and issue a written decision, including specific reasons for decision and any actions that need to occur, within 45 days of receipt.

- i. The written decision will be mailed or emailed to all parties involved in the grievance.
- c. The CoC Grievance Committee has the authority to request additional information, as needed, to make a final decision, including, but not limited to: interviews, agency policies, case notes, client files and any additional relevant documentation.
- d. When requested by the CoC Grievance Committee, a hearing shall be held in person or via virtual video conference. If a hearing is requested, then:
 - i. A Hearing Notice will be sent via mail and/or email, if applicable, no less than 10 days before the scheduled hearing to all involved parties. The notice will include the date, time and logistics of the hearing and a clear statement of the issues to be considered.
 - ii. All parties implicated in the grievance must be given the opportunity to be present during the hearing and to hear all oral information and review all written information that is being considered. The individual filing the grievance may also bring a person of their choice to assist during the hearing. Those needing assistance to identify someone who can assist during the hearing may contact MD BoS CoC staff via the [CoC Help Desk](#) (select “CoC Grievance Form”).
 - iii. CoC staff will keep minutes of the hearing, including a list of attendees, a list of documents presented and specific actions taken. If the person filing the grievance chooses not to attend the hearing, the committee may opt to review the grievance and gather all pertinent information via email, phone or virtual video conference.
 - iv. The CoC shall issue a written decision within 10 working days of the hearing that will include a clear explanation specifying the reasons for the decision and any actions that need to be taken.
 - v. The CoC Grievance Committee maintains the right to make a final decision based on any documentation provided and without a hearing.

- e. Limitations on Grievances for Providers and Grievance Committee Members
 - i. The CoC Grievance Committee will become involved in grievances related to the CoC Code of Conduct and other relevant CoC Policies. This process does not include grievances regarding the coordinated entry system, HMIS or annual funding competitions. Coordinated entry and the annual funding competitions have grievance and appeals procedures outlined in their respective policies.

V. Process to File a MD BoS CoC Grievance

- a. Parties of interest may submit a grievance in writing to the MD BoS CoC by selecting the “CoC Grievance Form” via the [CoC Help Desk](#), or by submitting the CoC Grievance form via mail or email, as stated on the form. A copy of the grievance form can be found in Appendix B: Sample MD BoS CoC Grievance Form.
- b. Grievance submissions should include a detailed explanation of the concern, including a list of all involved parties, a description of previous efforts to resolve the issue, dates that the efforts occurred and the desired outcome.
- c. All grievance related materials will be provided to Grievance Committee Members within five working days of receipt for review.
- d. Upon receipt, the CoC Grievance Committee will have 45 working days to review the grievance. This timeline may include reviewing submitted materials, requesting additional documentation and information, and requesting and conducting a hearing with parties involved.
- e. The CoC Governance Committee must submit a final response to all parties within 10 working days of the hearing.

VI. Record Keeping

- a. All materials related to formal grievances, including complaints, supporting documentation, actions taken and final decisions, must be retained for a minimum of three years.
- b. The CoC Lead Agency will maintain all records on behalf of the Balance of State CoC.
- c. Any CoC Grievance Committee decisions that become relevant to project compliance or performance may be subject to further evaluation or enforcement. In this instance, all records will be incorporated into the project monitoring records and be subject to the CoC Monitoring Policy and Procedures.

VII. Public Posting of this Policy

All MD BoS CoC-funded projects are required to post a physical copy of the grievance policy in an area visible to staff working with project participants who receive services from the project. An abridged version of this policy for printing can be found in Appendix A: MD BoS CoC Grievance Policy for Public Posting.

VIII. Committee Member Rules

In general, if a grievance involves any member of the CoC Grievance Committee or the issue presents a perceived bias based on local relationships, that member shall be recused from all matters pertaining to the grievance, including inappropriate access to materials, decision making discussions and final deliberations.

APPENDIX A:

MD BoS CoC Grievance Policy for Public Posting

MD Balance of State Continuum of Care Grievance Policy

- **Start Locally**

First, try to resolve the issue at the local level by following your project or Local Homeless Coalition (LHC) grievance process.

- **Escalate to BoS CoC**

If the issue isn't resolved, you can escalate the grievance to the BoS CoC. Here's what happens next:

- The grievance will be reviewed by the CoC Grievance Committee within 45 working days.
- The committee may request a hearing, either in person or via video conference. You'll receive notice at least 10 days before the scheduled hearing. This notice will include the hearing date, time, location and the issues to be discussed.
- The committee will provide a final decision withing 10 days after the hearing.

- **How to File a Grievance. Scan the Code to the right, OR**

- Go to the MD BoS CoC website at www.mdboscoc.org.
 - Click "Get Support" on the homepage.
 - On the Help Desk page, click "Submit a Request" in the top right corner.
 - Choose "CoC Grievance Form" from the drop-down menu.
 - Complete all sections of the form and click submit.
 - If you don't have access to a computer or the internet, ask for a paper version of the grievance form and send to:
Maryland Balance of State Continuum of Care
7800 Harkins Rd, Lanham, MD 20706



- **Grievance Hearing**

- If there is a hearing, you can attend the hearing and review the information considered.
- You may bring a person of your choice to help during the hearing.
- The CoC Grievance Committee will send a written decision within 10 working days after the hearing. The decision will explain the reasons and any action that must be taken

- **If You Need More Help Getting Started**

- Scan the Code above OR Go to the MD BoS CoC website at www.mdboscoc.org.
 - Click "Get Support" on the homepage.
 - On the Help Desk page, click "Submit a Request" in the top right corner.
 - Choose "General CoC Questions" from the drop-down menu.
 - Describe your question and click submit.

APPENDIX B:

Sample MD BoS CoC Grievance Form

CoC Grievance Submission Form

Your Name	
Your Email Address	
Your Phone Number	
No phone or email - How can we find you?	

Name of Person Assisting (If Any)	
Email & Phone Number of Person Assisting (If Any)	

Check the box next to your LHC or County below

<input type="checkbox"/> Allegany County <input type="checkbox"/> Cecil County <input type="checkbox"/> Frederick County <input type="checkbox"/> Garrett County	<input type="checkbox"/> Harford County <input type="checkbox"/> Southern MD (Charles, Calvert & St. Mary's) <input type="checkbox"/> Washington County
---	---

Type of Grievance—Who is Filing?

<input type="checkbox"/> I am a program participant filing against a provider <input type="checkbox"/> I am a CoC member filing against another CoC member <input type="checkbox"/> I am a CoC member filing against the CoC or HMIS Lead Agency <input type="checkbox"/> Other/Not Listed

What is this grievance related to?

<input type="checkbox"/> Violation of CoC Policy <input type="checkbox"/> Termination of Policy <input type="checkbox"/> Appealing an Organization's Decision <input type="checkbox"/> Other

Name of the organization or person you are filing a grievance against

--

Have you already filed an internal grievance with the organization?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Please describe your grievance in detail below and include the following information, if applicable:

- **A detailed description of the grievance (parties involved, issue in question)**
- **When the grievance began**
- **Any steps you've taken in an attempt to solve the issue**
- **A potential solution to the issue**

Would you like to file this grievance anonymously?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

The MD Balance of State CoC will not retaliate against an individual for filing a complaint. If you are concerned that you have or will face retaliation for filing a complaint and would like your information to remain anonymous, please check the “Yes” box above. Please understand that lack of disclosure may limit the ability of the CoC to address your grievance.

Note for clients wishing to submit a grievance anonymously: When filing an anonymous grievance, the CoC Grievance Committee may not be able to resolve the matter because the grievance will not be discussed in detail with provider staff. In this case, the grievance may be kept on file solely for record-keeping purposes and will be closed.

Signature

Date

By signing your name, you consent to information regarding this grievance being released to the staff of the CoC Lead Agency, the CoC Grievance Committee and other parties as needed to resolve the grievance

Please sign and mail this form to:
Maryland Balance of State Continuum of Care
7800 Harkins Road
Lanham, MD 20706
OR
Scan and email to:
boscoc.dhcd@maryland.gov