

Morris County Continuum of Care

Subject: Grievance Policy

Primary Responsibility: Chair of the Allocations Committee

Purpose: To ensure that all agencies and consumers participating in the Continuum of Care (CoC) understand their right to file a complaint or grievance regarding the provision of services or operations of the system and the process for submitting a grievance to the CoC.

Scope: The Morris County CoC maintains a grievance procedure to ensure all complaints are addressed promptly and in an unbiased manner. Agencies should consider using this grievance procedure for the following categories of complaints:

1. Grievances against the CoC Executive Committee, individual members of the Executive Committee or any contracted Consultants

All grievances against the CoC Executive Committee, individual members or contracted consultants should follow the procedure for submitting a grievance. In cases where the grievance is against the Allocations Committee, the grievance will be reviewed by the Executive Committee. In this case, any members of the Allocations Committee who sit on the Executive Committee will recuse themselves from conversations regarding the grievance. If a grievance is not resolved to the satisfaction of the individual filing the grievance, an appeal can be followed with the Newark, New Jersey Office of Housing and Urban Development (HUD) office.

Any grievances regarding the CoC Lead Agency, Morris County Department of Human Services, should follow the County's grievance process through the County Administrator.

2. Inter-agency grievances against funded providers

The CoC expects that providers will attempt to collaborate on any inter-agency issues that arise and come to favorable resolutions for all parties. In cases where these attempts fail, agencies may file a grievance against a CoC-funded provider using the standardized process outlined below.

3. Consumer grievances

All CoC-funded providers must have a formal written grievance procedure that is provided to all consumers at program admission. Agency grievance procedures shall be available in the language of the consumers' choice and at a third-grade literacy level. Agency grievance procedures shall include an anti-retaliation policy and outline the process for submitting grievances, including submitting appeals to the CoC. Agencies shall collect signatures from consumers at intake that they have received the agency grievance policy. Agencies shall submit their grievance policies to the CoC during monitoring.

All consumer grievances must begin by adhering to each agency's individual grievance procedure. If a consumer has a grievance that has not been resolved through the agency's grievance procedure, he/she/they may appeal to the CoC by submitting a grievance form using the standardized process outlined below.

Procedure for Submitting a Grievance

Anyone wishing to file a grievance in any of the above-referenced categories may initiate the process in one of the following ways:

- Using the fillable Grievance Form on the CoC website
- Completing a form and sending by mail or e-mail (see Appendix A)
- Using a consumer advocate to assist with submitting a grievance

After a grievance is filed, the Allocations Committee will review the grievance and determine the following:

- If the grievance is appropriate for formal review by the Allocations Committee or if it should be referred to a different Committee;
- If additional information or supporting documentation is required to make a determination regarding the Grievance; and
- Recommendations for resolution.

A representative of the Allocations Committee will provide written notification of the resolution to the person who filed the grievance and the consumer advocate, if applicable, within two weeks of the submission of the grievance.

Resolutions made by the Allocations Committee will be final.

Reporting

The Allocations Committee will ensure discussions regarding specific grievances are recorded, either in meeting minutes or via electronic communications. The Allocations Committee will file a report to the Executive Committee bi-monthly with the number of grievances received, the general complaint, trends, and resolutions. The Allocations Committee will share only general, non-identifiable trends regarding grievances with the CoC Executive Committee and general membership.

Anti-Retaliation

The Morris County CoC provides agencies and consumers who wish to file a grievance the opportunity to do so without retaliation from the party accused or any representative associated. Retaliation includes but is not limited to harassment; intimidation; violence; program dismissal, refusal to provide services; use of profane or derogatory language to or about the complainant or breach of contract.

The Morris County CoC will take immediate steps to stop retaliation and prevent its recurrence. These steps will include but are not limited to technical assistance; implementation of a corrective action plan; written report of grievance and retaliation to program funder(s); discontinuation of CoC funding. The CoC will request supporting documentation from the alleged victim of retaliation to substantiate all claims.

Communication

This policy will be posted on the CoC website, along with a fillable Grievance Form and information about how to submit grievances through other methods.

Allocations

Any grievances filed against funded providers will be considered during the CoC annual allocations process. Funded providers may lose points on their applications based on the content and resolutions of filed grievances. Scoring determinations are made by the Allocations Committee.