

**Flint/Genesee CoC
Policy: Code of Conduct**

Subject: Client Grievance Policy		Policy #: 201
Date Adopted:	Dates Reviewed:	Dates Revised:
Distribution: All Governance Council Members, General Members, Committee Members, Contracted Entities		Number of Pages:

Purpose:

To ensure that all persons receiving services within the Flint/Genesee CoC¹ are treated respectfully and when/if that is not the case that each client has the right to file a complaint if they feel they have been treated unfairly by any program or agency within the Flint/Genesee CoC.

Philosophy:

The Flint/Genesee CoC Charter calls for all participants including Governance Council members, General Members, Independent Review Team members, committee members, advisory council members and staff members of contracted entities to exercise care, diligence and prudence when acting on behalf of the CoC, focusing always on the mission of preventing and ending homelessness while treating each client with dignity and respect.

Policy:

The CoC is entrusted with specific responsibilities as described in local, state and federal statutes, regulations and in this Governance Charter, related to use of public funds which are invested in addressing a serious community concern—homelessness.

Agencies, members and staff are expected to observe the highest standards of ethical conduct in the execution of these responsibilities on behalf of the CoC. In the performance of their duties, members are expected to carry out the mandate of the CoC to the best of their ability, and to maintain the highest standards of integrity for actions with other members and representatives, service recipients, service providers, and members of the public. Members are expected to conduct themselves with courtesy and respect, without harassment, intimidation or any type of abuse including physical, verbal or emotional abuse.

Members and staff also agree to adhere to other provisions in the Charter including, but not limited to, confidentiality, gift acceptance and conflicts of interest in addition to the Diversity, Equity and Inclusion Commitments contained in the Charter.

¹ The Continuum of Care is a Federal Housing and Urban Development mandate collaborative organization for the coordination of homeless service revision required for federal and state funding.

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Accountability and transparency are included in the Guiding Principles contained in the Governance Charter and it is an expectation that members will participate with evaluation processes as one means of ensuring the highest standards of ethical conduct are guiding behavior and decision-making in the CoC.

Procedure:

The Flint/Genesee homeless system has a client grievance procedure to ensure that client complaints are dealt with quickly (informal within 24 hours and formally within 20 days) and fairly.

Clients are informed upon intake that they have full access to the grievance process. Clients are given a copy of the grievance procedure and a Client/ Grievance Form when a grievance is identified.

Staff at CoC-funded agencies, when needed, should explain the client's rights to them and how the grievance procedure works, including that a staff member will help them complete the form and file the grievance, if needed. Each Agency is expected to identify the responsible staff person that can assist with this process and if the complaint is with the CoC then the CoC Coordinator, is responsible for providing such assistance.

Informal Grievances: Client discusses complaint with whomever complaint is against (i.e., service provider agency) and works to resolve the complaint informally between the parties involved.

Formal Grievances: If the complaint is not resolved through this informal process, the client/ should file a [Client Grievance Form](#) following the agency's complaint process (as required per agency by HUD and forthcoming CoC Standard Operating Policy). If the complaint is still not resolved through the agency's formal process, the client should submit a formal complaint to the CoC Infrastructure Agency (currently Metro Community Development) following the process outlined below.

1. Client completes complaint fillable form and submits it to CoC InfrastructureLead Agency.
2. CoC Infrastructure Agency will review the grievance form, document to substantiate all concerns, and route complaint to the Grievance Review Committee. The Grievance Committee is comprised of 3-5 governance members chaired by the Vice Chair of Programs from the Governance Council.
3. The Grievance Committee then reviews the complaint form, any additional

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information, and works to resolve the grievance with the client. The entity will confer with the CoC Infrastructure Agency and other CoC partners as necessary.

4. The Grievance Committee Chair will then provide a written response to the grievance within twenty-one (21) days of the review. Copies of the response will be forwarded to the client, GC Secretary, and CoC Infrastructure Agency within ten (10) days of the decision.

5. If the client is not satisfied with the response to the grievance, s/he will be invited to participate in a case conference with staff from CoC Infrastructure Agency, Grievance Review Committee, and other CoC partners as necessary.

6. If the client is not satisfied with the results of the case conference, the client can then file a grievance with the appropriate funding body, following the grievance procedure of that body (i.e. HUD, MDHHS, etc.).

Anti-Retaliation Policy

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

The Flint/Genesee CoC will take immediate steps to stop retaliation and prevent its recurrence. These steps will include, but are not limited to:

- The Client CoC Grievance technical Assistance
- Complying with a Corrective Action Plan (CAP)
- Written report of grievance and retaliation to program funder(s)
- Discontinuing CoC Funding (Decision made at the discretion of the CoC Governance Board)

The CoC Infrastructure Agency will request supporting documentation from the alleged victim of retaliation to substantiate the claims. Supporting documents may include police reports, emails, and eye-witness statements.

Client Grievance Policy

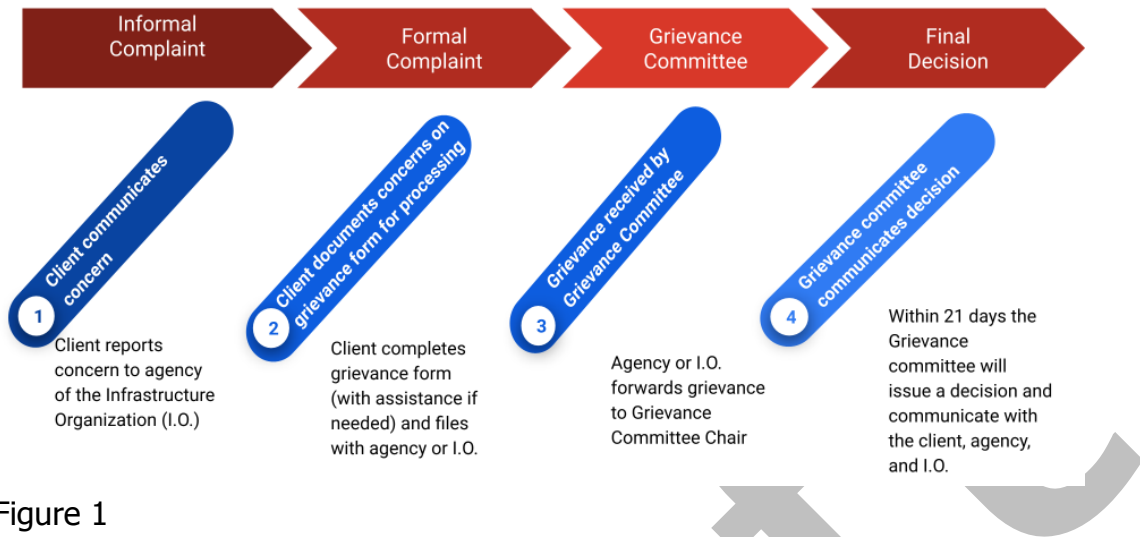


Figure 1

Governance Charter References:

Article 2: Mission and Vision

Article 3: Guiding Principles

Article 4: Diversity, Equity and Inclusion Commitments

[St. Louis Grievance Policy](#)

[Detroit Client CoC Grievance Policy](#)