

Flint/Genesee CoC
Policy: Code of Conduct

Subject: Agency Grievance Policy		Policy #: 202
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 Agency has the right to file a complaint if they feel they have been treated unfairly by any person 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 Agency 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.

Accountability and transparency are included in the Guiding Principles contained in the Governance Charter and it is an expectation that members will participate in 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 an Agency grievance procedure to ensure that Agency complaints are dealt with quickly (informal within 24 hours and formally within 20 days) and fairly.

Agencies are informed that they have full access to the grievance process. Agencies are given a copy of the grievance procedure and an Agency/[Grievance Form](#) when a grievance is identified.

The Infrastructure Organization (I.O.) annually should explain the Agency's rights to them and how the grievance procedure works, including that their staff member, the CoC Coordinator, will help them complete the form and file the grievance, if needed. Each Agency is expected to identify the responsible staff person for this process.

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

Formal Grievances: If the complaint is not resolved through this informal process, the Agency/ should file a formal complaint 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 Agency should submit a formal complaint to the CoC I.O. (currently Metro Community Development) following the process outlined below.

1. Agency completes complaint fillable form and submits it to CoC I.O..
2. CoC I.O. 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 information, and works to resolve the grievance with the Agency. The entity will confer with the CoC I.O. and other CoC partners as necessary.

DRAFT POLICY

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 Agency, GC Secretary, and CoC I.O. within ten (10) days of the decision.

5. If the Agency 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 Agency is not satisfied with the results of the case conference, the Agency 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 Agencies 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:

- TeDetroit Agency 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 I.O. 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.

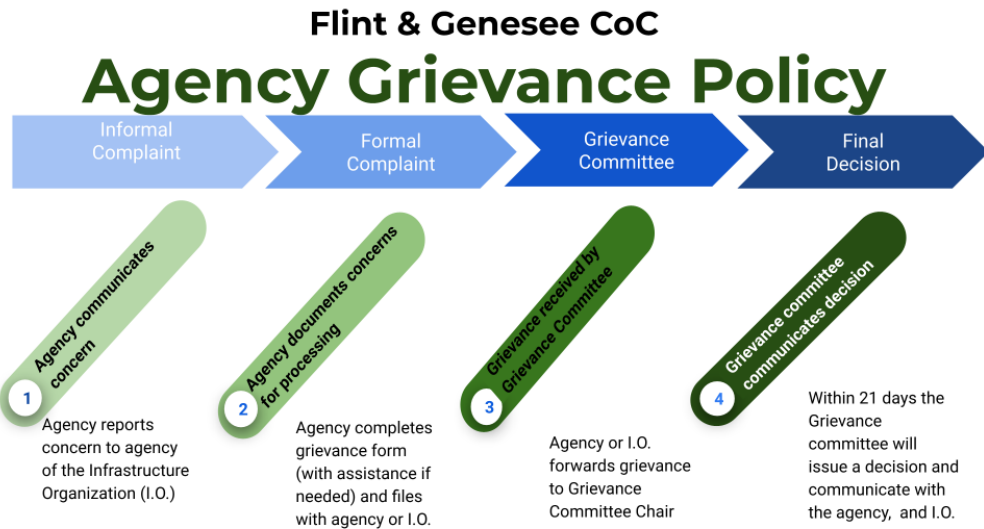


Figure 1

Governance Charter References:

Article 2: Mission and Vision

Article 3: Guiding Principles

Article 4: Diversity, Equity and Inclusion Commitments

[St. Louis Grievance Policy](#)

[Detroit Agency CoC Grievance Policy](#)