



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

Grievance Policy Revised May 2025

1. DEFINITIONS

CoC: The regional Continuum of Care (NY-511) as defined by the Department of Housing & Urban Development's *Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act: Continuum of Care Program* (24 CFR Part 578) encompassing Broome, Chenango, Cortland, Delaware, Otsego, & Tioga Counties.

CoC Funded Agency: Any entity currently receiving HUD Continuum of Care (CoC) funding.

CoC Member: Any entity or person that is currently a member of the CoC, including CoC Funded Agencies.

Collaborative Applicant: The entity designated by the CoC to collect and submit the annual CoC Consolidated Application to HUD and charged with monitoring compliance with CoC grant agreements and the requirements of 24 CFR Part 578. Currently, the Collaborative Applicant is CARES of NY, Inc. .

Consumer: Any individual who is, has, or is attempting to receive services or support from a CoC Funded Agency.

Consumer Grievance: 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 a consumers' rights, welfare, or status.

Grievance: Any dispute between an individual or agency and a CoC committee or 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 Coalition Operating Policies & Procedures, the Coordinated Entry Policies & Procedures, HMIS Policies & Procedures CoC Written Standards, 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 be used as a forum for initiating policy changes in the CoC.

Non-CoC Funded Agency Grievance: A grievance against a CoC Member that is not a CoC Funded Agency.



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

Non-Consumer Grievance: 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



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

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 HUD 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 within CoC Funded Agencies, as well as among CoC Members. All consumers and CoC members 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 a 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 non-discrimination, Equal Opportunity, and Fair Housing 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 *Coalition Member Responsibilities* and *Code of Conduct* (Section 6 of Coalition Policies & Procedures) and the CoC will enforce compliance to the extent a grievance indicates that a CoC Member has failed to comply.



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

3. PROCEDURE

- a. Any person wishing to file a grievance with the CoC may do so by (1) filling out the Grievance Form on pages 5-7 of this policy or available at the following website: <https://caresny.org/511-membership-governing-docs/> (2) obtaining a Grievance Form from a CoC Funded Agency and delivering it to the President of the STHC Board of Directors in-person or via e-mail; or (3) calling the President of the STHC Board of Directors. In the event that a grievance involves the President of the STHC Board of Directors, the grievance may be filed with the Vice President of the STHC Board of Directors. Unless it would be futile to do so, people must first attempt to resolve the grievance internally with the CoC Funded Agency or CoC Member Agency against whom the grievance is filed, as soon as possible after the event in question occurred.
 - i. 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 President or Vice President of the STHC Board of Directors, as appropriate.
- b. The CoC Board representative will acknowledge the filing of a grievance within 5 (five) business days. . All grievances will be reviewed by the STHC Board of Directors in Executive Session and Board members 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 grievance is properly brought to the CoC process, the representative will gather relevant information from the person filing the grievance and the CoC Funded Agency or CoC Member Agency indicated. Based on the facts and any supporting documentation, the STHC Board of Directors 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 STHC Board of Directors to determine a proper resolution to the grievance. 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 STHC Board of Directors for further review. All outcomes determined by the STHC Board of Directors upon further review will be considered final.



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

4. REPORTING

Board discussions regarding a grievance should be held in a closed, executive session.

5. TRAINING

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



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

GRIEVANCE FORM

Name of Person or entity filing complaint: _____

Name of CoC Funded Agency or CoC Member filing grievance against:

I have attempted to address this complaint with the agency: Yes No

If No, would talking to the agency be futile? Yes No

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.



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

Grievance: Please provide details of your complaint here and be as specific as you can. Attach any documentation you think would be helpful in understanding your grievance.



CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga Counties

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**CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, & Tioga
Counties**

ADDRESS _____

TELEPHONE NUMBER _____

E-MAIL: _____

COMPLAINANT'S REPRESENTATIVE, if any: _____

Submit to:

Tim Lockwood President, STHC Board of Directors

Email: tlockwood@ccocc.org

Phone: 607-756-5992 Ext. 202

OR

Kimberly Lorraine Vice President, STHC Board of
Directors Email: kimberly@chenangohealth.org

Phone: 607-337-4171