



Coordinated Entry Grievance Policies and Procedures

WI BOS Coordinated Entry grievance policy:

This policy refers to complaints and grievances regarding the Coordinated Entry System only and provides additional detail to the grievance policies in the Coordinated Entry Policies and Procedures manual 2.0, the Agency Participation Agreement, and the Staff Participation Agreement.

Definitions

Complaint is defined as a verbal expression of dissatisfaction by the participant, agency, or community member regarding Coordinated Entry services provided by Wisconsin Balance of State CoC member agencies which can be resolved at the point at which it occurs by the staff present. Complaints are considered resolved when the participant, agency, or community member is satisfied with the action taken by the agency in question.

Grievance is defined as a written expression of dissatisfaction with some aspect of Coordinated Entry service that has not been resolved despite attempts to do so by participants, agencies, or community members at the point of service. Any such written expression sent to the WI BOS will be considered a grievance.

Types of Grievances

Participant/Community Member grievances:

If an individual has a complaint or grievance regarding a particular agency or representative of that agency, it is recommended they follow that agency's procedure for collecting and resolving complaints or grievances.

An effort to resolve complaints locally should be made before filing a formal grievance with the WI BOS. This can be done by contacting the Coordinated Entry Lead for your local Coordinated Entry System. The contact information for the Coordinated Entry Lead in every coalition can be found on the WI BOS web site at:

<https://www.wiboscoc.org/coordinated-entry.html>

The provider completing the Pre-Screen, assessment, and referral shall address any complaints by the individual at the time they are made aware of the complaint or client dissatisfaction. The individual and the provider will try to work out the problem directly as a first step in the process. If the complaint is not resolved, the individual may initiate the WI BOS Grievance Procedure.

The individual has the right to be assisted by an advocate of his/her choice (e.g., agency staff person, co-worker, friend, family member, etc.) at each step of the grievance process. Any grievance paperwork filed by an individual shall note his/her name and contact information so WI BOS staff can contact him/her to discuss the issues. Consent to have an agency or advocate work on an individual's behalf must be submitted in writing to the WI BOS. The individual has the right to withdraw his/her grievance at any time.



Provider Grievances:

It is the responsibility of all boards, staff, and volunteers of COC-funded and EHH-funded projects to comply with the policies and procedures of the WI BOS Coordinated Entry System. Anyone filing a grievance concerning a violation or suspected violation of the policies and procedures must be acting in good faith and have reasonable grounds for believing an agency is violating the Coordinated Entry System policies and procedures.

An effort to resolve complaints locally should be made before filing a grievance with the WI BOS. This can be done by contacting the Coordinated Entry Lead for your local Coordinated Entry System. If this does not resolve the issue, the provider may begin the grievance procedure.

Procedure for filing a grievance with the WI BOS

Any person or agency wishing to file a grievance should submit a written statement to the CoC Director describing the alleged violation of the Coordinated Entry System policies and procedures; and any actions taken on behalf of the person or agency to resolve the issue. The statement should be as specific as possible and contain the name and location of the agency, date and time of incident, and any other details that may be helpful to the WI BOS staff as they investigate the incident. Grievance paperwork filed with the CoC Director must provide name and contact information of the individual(s)/agency filing the complaint, so WI BOS staff can contact them to discuss the grievance. Identifiable information of the reporting person will be considered confidential and is only collected to enable further investigation of the grievance. Grievances that do not contain the contact information of the person filing the grievances, or grievances filed by a third party, will not be considered and no further action will be taken.

Grievances must be submitted by the person experiencing the grievance or their stated representative. Third party submissions, or grievances filed by a person or agency alleging an act between original parties, will not be considered. The exception are complaints or grievances filed by the Division of Energy, Housing and Community Resources (DEHCR), Institute for Community Alliances (ICA), or U.S. Department of Housing and Urban Development (HUD).

Grievances must be filed with the Wisconsin Balance of State Continuum of Care within 60 calendar days from the date of the incident. Grievances filed after 60 calendar days from the date of the incident will not be reviewed by the WI BOS.

Reasonable accommodations are available upon request from the CoC Director.

Grievance Review Procedure

The first person to review the grievance is the CoC Director. WI BOS staff will notify the agency stated in the grievance within 14 calendar days of receiving the grievance. This notification will be sent to the staff member listed on the Agency Participation Agreement. The notification will contain as much information as possible regarding the complaint without disclosing personally identifiable information of the individual and/or provider filing the grievance to ensure confidentiality. Agencies have 7 calendar



days from receiving the grievance notification to provide a response if they would like it to be included in the grievance review by WI BOS staff.

WI BOS staff will review all information, conduct interviews with the reporting person and agency stated in the grievance, and gather relevant information about the situation. This can include but is not limited to: reviewing agency client files, Service Point records, interviewing agency staff, or interviewing witnesses or other involved parties. The review process will be completed within 14 calendar days from the date the agency stated in the grievance was provided notification of the grievance.

Following the grievance review process, WI BOS staff shall make a determination as to whether the grievance has been substantiated as a violation of the coordinated entry system policies and procedures. WI BOS staff will provide written documentation to the agency in violation of the determination, the corrective action required, and timeline to complete corrective actions. A written statement summarizing the outcome of the grievance review will be provided to the reporting individual or agency. In the interest of transparency, the WI BOS reserves the right to notify the Local Coordinated Entry System participants, CE Leads, coalition Lead(s), or other parties impacted or potentially affected by the violation.

The agency issued corrective actions may request a meeting, in person or via telephone, to discuss the implementation of corrective actions. WI BOS staff may provide training and reasonable assistance in the agency's effort to comply.

All efforts shall be made to resolve grievances in a timely manner. The time frames provided indicate a maximum number of days for each step in the process.

Grievance Appeal Procedure

An appeal may be filed with the WI BOS Board of Director's President if either party believes WI BOS staff failed to comply with the Coordinated Entry policies and procedures for investigating a grievance, acted in an unreasonable manner, would like to have new information considered that was not previously available, or do not agree with the findings based on the evidence presented. An appeal must be submitted in writing within 7 calendar days from the date marked on the determination letter from the WI BOS. Appeals received after 7 calendar days from the date of the letter will not be reviewed.

The WI BOS Board of Director's President will review the appeal and may designate one or more Board members or other assigned committee to review the appeal, supporting documentation, and collect additional information necessary to consider the appeal. After gathering relevant information, the review of all collected information and make a determination as to whether WI BOS staff followed Coordinated Entry grievance procedure and the corrective action was reasonable based on the evidence presented. The Board President or designated Board member(s) or other assigned committee will inform the appealing party in writing of their determination within 14 calendar days from the date of the appeal letter. The decision of the WI BOS Board of Directors is final.

Approved by _____ on _____

Approved by CoC Membership 8.10.18



Coordinated Entry Grievance Timeline

Step 1: Incident occurs

- A grievance can be filed within 60 calendar days from the date of the incident.

Step 2: Grievance filed

- WI BOS staff will notify the agency stated in the grievances within 14 calendar days.

Step 3: Agency Response

- Agencies have 7 calendar days from receiving the notification to provide a response.

Step 4: Review and Decision

- WI BOS staff will review the grievance and make a determination within 14 calendar days of the date the agency was notified of the grievance.

Step 5: Appeal

- An agency can submit an appeal within 7 calendar days from the date marked on the determination letter.

Step 6: Response to Appeal

- The WI BOS Board shall review and make a final decision within 14 calendar days from the date of the appeal letter.