
Fwd: Grievance Inquiry Documentation Copy for CoC Leadership Board

Christoverre Kohler <cvkohler@gmail.com>
To: Alameda County <alameda@homebaseccc.org>

Thu, Sep 19, 2024 at 12:19 PM

For Public Distribution and to Alameda CoC Leadership Board

----- Forwarded message -----

From: **Christoverre Kohler** <cvkohler@gmail.com>
Date: Thu, Sep 19, 2024 at 12:07 PM
Subject: Re: Grievance Inquiry
To: Fellers, Anna, HCSA <Anna.Fellers@acgov.org>

Greetings, Ms. Fellers:

In a document of Alameda County entitled "Alameda-County-Coordinated-Entry-Policies" it is stated in part (*emphasis added*):

1.1 Purpose of Coordinated Entry

Alameda County defines Coordinated Entry as the approach to coordinate and manage the

Homelessness Response System's resources to enable providers to make equity-consistent

decisions to best connect people experiencing homelessness to interventions to end their

homelessness based on available information and resources.

The Coordinated Entry process serves to ensure that **all persons experiencing homelessness**

have fair and equal access to the same set of resources and services regardless of where they present for assistance, and that resources for households with greater service and housing needs are targeted to those who need them most

The Coordinated Entry system refers to the whole of the public and non-profit agencies and programs that participate in Coordinated Entry in any of the ways defined in and governed by these policies."

Just so, my complaint/grievance centers on my having been prevented and/or falsely assured of receiving particular benefits/services for which I was eligible.

And I was not provided further access nor referrals by/to any other CoC resources that could have been of critical benefit to me. That was clearly a failure of CE function by the agency I presented to at the time, and which committed to me specific services/resources would be provided to me, but which have remained unfulfilled. This same denial/failure to assist me with this, by all other CoC entities I've attempted to turn to since, and up until now, has continued and compounded the violations of my civil rights, ignoring my appeals for reasonable accommodations and has increased detrimental and harmful effects to me, my housing stability, and my welfare as a direct result.

I did submit formal complaint/grievance to BACS, in particular, according to the minimal procedure they'd identified and provided but I did not receive any genuine or appropriate response. Quite the opposite, in fact. And what ensued could not reasonably be regarded as any good faith nor substantive, genuine process/procedure of the kind. Further, I learned later that they'd construed my contact with the City of Berkeley as amounting to an activation of CoB complaint/grievance process which allegedly obviated and replaced their obligation to pursue such with me any further (although neither they nor CoB so much as advised me of this at the time).

Due to such a protracted and seemingly dubious process by BACS, I eventually sought to submit the complaint/grievance to CoB, but was told they simply do not have any such procedure or option. I provided them with copies of my original documents submitted and copies of communications between BACS and myself, which they had requested I do, and enlarged upon the ongoing matters as those were taking place.

HUD specifies that it is a requirement of agencies/CoC's receiving ESG/RRH fundings, in particular, that there be a specific complaint/grievance procedure, and that such be provided and available to participants as a requirement upon CoCs, as well, in order to even qualify as a CoC with HUD. This includes option for "appealing" or "escalating" a matter to a next higher authority/jurisdiction as may be necessary, and that complainant/aggrieved party be informed of who/where/how to pursue that.

BACS considered that to be CoB, apparently, but CoB has not provided me with a next option beyond their own missing option, despite my direct requests and in violation of HUD and Alameda County specifications. The specific funding granted to CoB and so to it's provider sub-recipient BACS, in part came through the County

as a funding source, according to CoB Memorandum authorizing BACS and, later, a document evaluating performance and in documentation for reporting to HUD, therefore was subject to HUD requirements, accordingly. I'd been directed by several persons to contact the County via the generic "info" e-address, which I did and that produced contact with Mr. Kawal Ulanday, as you know.

Since I specified the CE function, and sought to pursue a matter on that basis, once I happened to discover documentations revealing it, he referred me to you, as you also know. I am told that the CoC only has an option for either a Discrimination and/or CE based action and/or an HMIS action. While my matter also resulted in an incomplete and inaccurate HMIS record about me, which agencies and which particular programs and/or activities have been involved or not, that was incidental to the main matters and not a complaint I've had about the HMIS which I am assuming only has what was entered or not by other provider agencies. And inherent in the matters, especially in some distinct ways and at certain points in time, my disabilities and requests for reasonable accommodations have been flatly ignored and/or denied, which may amount to adverse discrimination.

So that still leaves the CE basis, which you and Mr. Ulanday have appeared to deny me, but for reasons I do not understand, especially given the Alameda County policy and definition of the CE function. Perhaps along with an absence of any other appropriate option. For instance, in the same document cited above (*emphasis added*):

"1.2 Coordinated Entry Policy Requirements

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoCs) to develop and maintain policies and procedures covering a wide variety of Coordinated Entry (CE) practices including, but not limited to, geographic coverage and access including for specific populations; the assessment, prioritization and referral process and criteria/factors used to prioritize; privacy protections, appeals, marketing, outreach, prevention, and evaluation. This Coordinated Entry Policy document, along with procedures established for specific areas of Coordinated Entry and memorialized in other policy documents referenced herein (such as the HMIS Privacy and Security Policies, Housing Problem Solving Policy, Coordinated Entry Grievance Policy and others) constitute the required Policies and Procedures for Coordinated Entry."

"1.4 Guiding Principles

The following guiding principles reflect key values and features of the current CE design and a commitment to implement and evaluate the system in alignment with these principles.

1. **Coordinated Entry** will embody in all steps of the process a commitment and practice of direct communication and transparency with participants about the process, limitations on resources and the likelihood of and timing of any assistance. "

Other than initial assertions of particular services/benefits for which I was eligible and then express and identified commitments made and reassured to me, there has been minimal advisory beyond that and despite my several direct enquiries about the associated necessary details.

"2. The **Coordinated Entry** system will operate similarly in each place the services are offered so that participants have equal access to support and resources regardless of where they seek assistance or their circumstances.

4. The **CE** process will be trauma-informed and personal information will be collected from participants only as needed and when relevant to a determination or decision needed to help meet the participant's self-reported needs. Efforts will be made to ensure that participants do not need to repeat information.

5. The **Coordinated Entry** system and the programs to which it refers will be low barrier and operate consistent with the core practices of harm reduction and Housing First.

6. Participants are experts in their own lives and will make choices about what is right for them. Such choices may be constrained by the availability of resources but will not prevent the participant from being served.

7. The reality of limited resources means that participants may not receive the most desirable or appropriate resources for their needs. All participants will retain the ability to engage continuously with the system and seek and receive support for a self-directed resolution."

Accordingly, that has been my continued and repeated effort. Clearly it is exactly within CE, as defined. How may I actually proceed with pursuing my CE

complaint/grievance most appropriately and effectively? I've before requested help in doing so and examples of what is required of me to do so.

Please advise at the earliest possible time. Thank you for your attention and assistance.

Sincerely,

C. Kohler

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On Tue, Aug 20, 2024 at 9:46AM Fellers, Anna, HCSA <Anna.Fellers@acgov.org> wrote:

Hi Mr. Kohler,

Thank you for your patience on this reply. Kawal has been in touch with me about your situation, and I share his appreciation for your efforts to advocate for yourself and to make your experience known to hopefully lead to improvements in our community's processes.

The circumstances that are related to your grievance do not seem to be related to services received at a Housing Resource Center or connected to the process of moving into a housing opportunity that was referred through Coordinated Entry. Therefore this would not be a Coordinated Entry grievance.

Based on what I understand of the situation that has led to this point, it sounds like your concerns were related to a program managed by BACS and funded by the City of Berkeley and therefore those would be the places to direct a grievance. I agree with Kawal's suggestion to "document and outline your complaints clearly and formally submit to CoB as the funder of the program despite Peter Radu's response to you. Make clear your complaints against BACS and CoB and what a resolution would look like for you".

Thank you,

Anna Fellers, LCSW

Acting Coordinated Entry Manager

Alameda County Health

[Housing and Homelessness Services \(H&H\)](#)

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