

# Continuum of Care Grievance Policy Frequently Asked Questions

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## Overview

This document addresses frequently asked questions about grievance policies for the Continuum of Care (CoC) and its associated systems, including Coordinated Entry and the Homeless Management Information System (HMIS). This document will answer common questions including:

- What is a grievance?
- What is a grievance policy?
- How and where do I file a grievance?

This document is for HUD CoC-funded programs, Coordinated Entry, and HMIS. Housing and homeless service providers outside the CoC are not covered by the grievance policies and procedures in this FAQ. If you have a grievance or complaint

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against a program outside the CoC, you can contact that program to ask for a copy of their grievance policy.

This document provides a landscape of current grievance policies and procedures for HUD CoC-funded program. It only states what grievance policies and procedures *currently are*. It does not revise grievance policies and procedures or say what grievance policies and procedures should be.

### What is a grievance?

A **grievance** is an official statement of a complaint about something you believe is wrong or unfair, with the potential for formal action to resolve the grievance.

A **complaint** is an expression of dissatisfaction. A complaint can be informal and may not require formal action.

Agencies with grievance policies may include their definition of a grievance. This helps participants to know the type of grievances that the policy will address. For example, the [Alameda County Coordinated Entry Grievance policy](#) defines a grievance as “an expression of dissatisfaction with any aspect of the Housing Problem Solving or Coordinated Entry process.”

Not every type of complaint can be a formal grievance. The HUD CoC-funded programs, Coordinated Entry, and HMIS entities can only address grievances and complaints within their control. It is important to consult a grievance policy to know what type of grievance is covered by the policy. If a grievance or complaint is outside the scope of the entity’s control or policy, then the entity may not be able to resolve your grievance.

Examples of types of grievances that can be addressed by the CoC and associated entities include:

- Access
- Assessment
- Discrimination
- Housing Problem Solving
- Prioritization
- Referral

## What is a grievance policy?

A **grievance policy** is written rules for HUD CoC-funded programs, Coordinated Entry, and HMIS entities about what standards they must meet for grievances.

A **grievance procedure** is the step-by-step process of putting the policy into practice.

Key elements of a grievance policy and procedure are:

- Accessibility: Policy and procedure should be available and understandable
- Scope: Who can file a grievance and what type of issues are covered
- Filing: How to file a grievance
- Review: How the grievance will be reviewed, the process of the review, and who will conduct the review
- Response: How the decision will be made, who will make the decision, and the timeline for the response to the grievance
- Appeal: How the participant can appeal the response, to whom, and the timeline for a response to the appeal

A grievance policy and procedure helps to:

- Ensure accountability
- Promote transparency
- Improve service quality
- Facilitate problem-solving, and
- Protect the rights of participants and prospective participants.

## Who is required to have a grievance policy?

In the Continuum of Care (CoC), the following entities have a grievance policy:

- HUD CoC-Funded Programs,
- Coordinated Entry, and
- Homeless Management Information System (HMIS).

## What about entities outside of the CoC?

Other entities may have grievance policies. However, the regulations that control grievance policies for the CoC do not control grievance policies for programs and systems outside of the CoC. For example, a grievance about an emergency shelter that receives Emergency Solutions Grant (ESG) funding should not be directed to Coordinated Entry or HMIS. That grievance should be addressed to the emergency shelter operator or the entity that manages ESG funding. This document includes a system map of the HUD CoC-funded programs with grievance policies.

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If you need to request the grievance policy and process for an entity *outside* of the CoC, you can use the template in Attachment 2. In the template, there is sample language for how to request a grievance policy and process. This is meant to help you submit your grievance to the correct agency through the correct procedure.

### What must be in a grievance policy?

Grievance policies help make sure that concerns are addressed in a fair, respectful, and timely manner. **All CoC grievance policies must include the elements listed below.** This ensures consistency and protects participant's rights across the CoC.

Element	Description	Rationale
<b>Written Policy and Procedure</b>  <a href="#">24 CFR § 578.91(b)(1)</a>	Grievance standards must be in writing and available to participants.	Makes sure rules are applied objectively and consistently  Provides clear standards for participants and staff
<b>Accessibility</b>  <a href="#">24 CFR § 578.93(d)</a>	Policies and forms must be easy to read. Policies and forms must be available to non-English speakers, people with disabilities, and people with limited access to technology. Participants must be able to file grievances in writing or verbally, and staff must assist upon request.	Compliant with Fair Housing, Section 504, and ADA requirements  Provides meaningful access for all participants
<b>Notification of Rights (Program Rules)</b>  <a href="#">24 CFR § 578.91(b)(1)</a>	During an intake process, participants must be informed about their right to file a grievance. When participants receive notices about changes to services or housing, they must also be told about their right to file a grievance.	It is a due process requirement to inform people about program rules, the termination process, and the grievance process.

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<p><b>Notification of Rights (Civil Rights)</b></p> <p><a href="#"><u>24 CFR § 578.93(c)(3)</u></a></p>	<p>All programs must tell participants about their rights and remedies under federal, State and local fair housing and civil rights laws.</p>	<p>Participants must be informed about their rights and remedies under Federal, State, and local fair housing and civil rights laws.</p>
<p><b>Notification of Rights (VAWA)</b></p> <p><a href="#"><u>24 CFR §578.99(j)(4)(i)</u></a></p>	<p>Policies must require programs to provide participants with HUD Form 5380 Notification of Occupancy Rights Under the Violence Against Women Act (VAWA) and Form HUD-5382.</p> <p>The VAWA Notice must be provided during the following events:</p> <ul style="list-style-type: none"> <li>• When assistance is denied</li> <li>• When someone is admitted to the program</li> <li>• When a participant receives an eviction notice</li> <li>• When a participant is terminated from a program</li> </ul>	<p>Ensures compliance with the Violence Against Women Act (VAWA)</p>
<p><b>Confidentiality and Protection from Retaliation</b></p> <p><a href="#"><u>24 CFR § 578.99(j)</u></a></p>	<p>Policies must protect participants' privacy and limit information sharing to involved staff only. Policies must clearly ban retaliation for filing or supporting a grievance.</p>	<p>Policies must protect privacy and prohibit retaliation</p> <p>Protection against termination for victims of domestic violence is explicitly required</p>
<p><b>Investigation and Written Response</b></p> <p><a href="#"><u>24 CFR § 578.91(b)</u></a></p>	<p>Policies must explain how grievances will be reviewed and investigated. Decisions must be provided in writing.</p>	<p>Provides transparency</p> <p>Makes sure the appeal process has a documented decision to review</p>

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<p><b>Appeal Process</b></p> <p><a href="#">24 CFR § 578.91(b)(3)</a></p>	<p>Policies must provide at least one level of appeal to someone not involved in the original decision. Appeals must have clear steps, timelines, and protections from conflicts of interest.</p>	<p>The initial decision must be reviewed by an objective, non-conflicted party.</p>
<p><b>Recordkeeping and Oversight</b></p> <p><a href="#">24 CFR § 578.103</a></p>	<p>Agencies must keep grievance logs separate from participant service files.</p>	<p>Supports program monitoring, compliance, quality improvement, and required data reporting.</p>
<p><b>Posting and Availability</b></p> <p><a href="#">24 CFR § 578.91(b)(1)</a></p>	<p>Policies must be posted in common areas and shared at intake and discharge. Policies must be provided when requested, including translated or alternative formats when needed.</p>	<p>Makes sure participants have ongoing access to the policies</p> <p>Supports notification of rights and transparency</p>

In addition to the required core elements, the **HUD regulations imply the following requirements:**

Element	Description	Rationale
<p><b>Clear Steps to File a Grievance</b></p> <p><a href="#">24 CFR § 578.91(b)</a></p>	<p>Policies must explain how to submit a grievance, what information to include, and where to send it.</p>	<p>Ensures the formal process is easy to navigate and accessible to the participant.</p>
<p><b>Timelines</b></p> <p><a href="#">24 CFR § 578.91(b)(2)</a></p>	<p>Policies must outline the timeline for when the agency will acknowledge, investigate, and respond to a grievance. It must also outline faster timelines for emergencies.</p>	<p>Regulations require "prompt written final notice". Clear timelines help ensure prompt action.</p>
<p><b>Access to Support</b></p> <p><a href="#">24 CFR § 578.91(b)</a></p>	<p>Participants can choose to have an advocate, support person, or attorney involved at any stage.</p>	<p>Helps ensure the participant's right to present their case in an effective way. This aligns with due process and non-discrimination principles.</p>
<p><b>Service Continuation (when safe)</b></p> <p><a href="#">24 CFR § 578.91(a)</a></p>	<p>Participants should continue receiving services while an appeal is being reviewed. An exception to this practice is if there is an</p>	<p>It is unfair to lose assistance while due process rights are being exercised (implied by the timing of termination). Termination does not prohibit a participant from</p>

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	immediate health or safety concern.	receiving assistance at a future date.
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Finally, these elements are not required by HUD but are considered **best practices**:

Element	Description	Rationale
<b>Available Online</b>	Agencies should make policies available on their website for easy access by participants	Allows participants to access and review grievance policies and procedures on their own.
<b>Informal Resolution</b>	Agencies should try to resolve issues informally, when possible. However, agencies should not prevent someone from filing a formal grievance.	Encourages early problem-solving. This is a common requirement in CoC local standards to help efficiently manage disputes.
<b>Escalation to Higher Decision-Making</b>	Agencies should describe when and how participants can escalate a grievance or appeal to a higher authority outside the program's chain of decision-making. The policy should include who to contact and how to submit information.	This practice ensures a final layer of independent oversight.

### How do I file a grievance?

Before you file a grievance, check the grievance policy to make sure you are filing a grievance with the correct entity for your type of problem. For example, if you have a complaint about termination of services at a CoC-funded program, you must follow that program's grievance procedure. In this example, it would not be correct to file a grievance with the Coordinated Entry System or HMIS because they do not have control over that program. There is more information below about where to find specific grievance policies.

Grievance policies will specify the procedure for filing a grievance with the entity. But some helpful information you should be ready to provide includes:

- Your name and contact information,
- A description of your grievance, including the entity the grievance is against, and
- When the events of your grievance occurred.

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It is important that you follow the entity's procedure when making your grievance. This helps the entity document your grievance correctly and follow the procedures for reviewing and responding to your grievance.

### Where do I file a grievance?

This chart has the grievance policies and forms for HUD CoC-funded programs, Coordinated Entry, and HMIS. The entities listed below received funding in the [HUD CoC Notice of Funding Opportunity \(NOFO\) for 2024](#). This table will be updated if other entities receive HUD CoC funding in future NOFOs.

The links will take you to the form to file a grievance or to the policies and procedures that explain how to file a grievance with the entity. **Please note that the grievance policy and procedure may not be in the name of the program.** For example, a program's grievance policy and procedure may be the service provider's policy and procedure.

If you need to request a grievance policy and process for an entity outside of the CoC, you can use the template in Attachment 2. The template has sample language you can use to request a grievance policy and process. This can help you submit your grievance to the correct place and follow their process.

Entity Name	Program Name
Abode	<a href="#">STAY Well Housing</a>
	<a href="#">Impact</a>
Adult Board and Care PSH	<a href="#">Insight Housing</a>
Alameda County Allied Housing Program	<a href="#">Carmen Avenue Apartments</a>
Alameda County Behavioral Health Department (BHD)	<a href="#">Laguna Commons Rental Assistance Program (RAP)</a>
Alameda County	<a href="#">Alameda County Shelter Plus Care - PRA</a>
	<a href="#">Alameda County Shelter Plus Care - SRA</a>
	<a href="#">Alameda County Shelter Plus Care - TRA</a>
	<a href="#">Alameda County Shelter Plus Care - SRO</a>
	<a href="#">Welcome Home Full Consolidation</a>
	<a href="#">Welcome Home San Leandro</a>
	<a href="#">Homes for Wellness</a>
<a href="#">Lorenzo Creek Consolidated</a>	

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	<a href="#">APC Consolidated PSH</a>
	<a href="#">APC Multi-Service Center</a>
	<a href="#">Southern Alameda County Housing/Jobs Linkages Program</a>
	<a href="#">Tri-City FESCO Bridgeway Apartments</a>
	<a href="#">Oak Days</a>
	<a href="#">Domestic Violence Coordinated Entry System</a>
	<a href="#">Youth Housing Demonstration Project (YHDP)</a>
	<a href="#">Transitional Housing-Rapid Rehousing (page 17)</a>
	<a href="#">YHDP Coordinated Entry</a>
	<a href="#">YHDP Homeless Management Information System (HMIS)</a>
	<a href="#">YHDP Peer Navigation</a>
Bonita House	<a href="#">Channing Way Apartments</a>
City of Berkeley	<a href="#">Supportive Housing Collaborative Project</a>
	<a href="#">COACH Project</a>
Cornerstone Community Development	<a href="#">Bessie Coleman Court Permanent Supportive Housing</a>
	<a href="#">Alameda County Domestic Violence SSO CES Project</a>
<a href="#">Coordinated Entry</a>	
<a href="#">Homeless Management Information System (HMIS)</a>	
Larkin Street Youth Services	<a href="#">Turning Point</a>
LifeLong Medical Care	<a href="#">Health, Housing and Integrated Services Network</a>
Resources for Community Development	<a href="#">Concord House</a>
	<a href="#">Regent Street</a>
Restorative Pathways	<a href="#">Rapid Re-Housing for Victims of Domestic Violence Renewal</a>
	<a href="#">Rapid Re-Housing for Transition Age Survivors of Domestic Violence</a>
	<a href="#">Transitional Housing and Rapid Rehousing for Youth Victims of Domestic Violence</a>
Satellite Affordable Housing Associates (SAHA)	<a href="#">Peter Babcock House &amp; Redwood Hill</a>
Safe Alternatives to Violent Environments (SAVE)	<a href="#">Mariposa II</a>
City of Oakland	<a href="#">Oakland Homeless Youth Housing Collaborative</a>

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	<a href="#">North County Family Rapid Rehousing Collaborative</a>
	<a href="#">North County Homeless Youth Rapid Rehousing</a>
	<a href="#">Housing Fast Support Network TH/RRH</a>

### What are the grievance procedures for Coordinated Entry and HMIS?

Each HUD CoC-funded program has its own grievance policy, as outlined above. You can use the information above to contact a HUD CoC-funded program and ask for a copy of their grievance policy. An overview of the Coordinated Entry and HMIS grievance policies is provided below.

<b>Entity</b>	<b>Coordinated Entry</b>	<b>HMIS</b>
<b>Types of Grievances</b>	Any part of the Housing Problem Solving or Coordinated Entry process, including Access, Assessment, Prioritization, Referral, Discrimination, or something else.	Any issue with HMIS that a participant has been unable to resolve with the program entering the information into HMIS, including data entry, privacy, data usage, or something else.
<b>Filing a Grievance</b>	<p>Required first step is informal resolution, which is trying to collaboratively resolve the issue before escalating to a formal grievance.</p> <p>If informal resolution is unsuccessful, the participant can file a written grievance at their Access Point or at the Housing and Homelessness Services (H&amp;H) office, 1900 Embarcadero Cove, Suite 210, Oakland, California 94606. Staff can also write down a verbal grievance.</p>	<p>Required first step is to work with the program directly.</p> <p>If unsuccessful, the participant completes the <a href="#">HMIS Client Grievance Form</a> and emails it to <a href="mailto:hmissupport@acgov.org">hmissupport@acgov.org</a>.</p>
<b>Review</b>	The policy requires a review of the initial grievance by a staff person. Then, if needed, the Access Point Supervisor/Manager must review and attempt resolution.	

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<b>Grievance Response</b>	The staff member or supervisor must provide the participant with a written response within seven (7) calendar days of the grievance being filed.
<b>Appeal</b>	If the participant is not satisfied with the initial response, they may submit a written Appeal to Housing and Homelessness Services (H&H).
<b>Appeal Response</b>	H&H will provide a written decision regarding the appeal.

### What if I have a discrimination grievance?

A housing discrimination grievance is when someone has discriminated on you based on a protected status. [Federal law](#) prohibits housing discrimination based on race, color, religion, national origin, disability, sex, or familial status. In [California](#), housing discrimination is prohibited based on age, ancestry, citizenship, color, disability, gender, gender expression, gender identity, genetic information, marital status, military or veteran status, national origin, political affiliation, race, religion, retaliation, sex, sexual orientation, and source of income.

Housing discrimination complaints can be made using any of the above grievance policies. Housing discrimination grievances can also be submitted to the State of California Civil Rights Department. For more information about the discrimination grievance process, please visit the [State of California Civil Rights Department's website](#).

Housing discrimination grievances can also be submitted to the U.S. Department of Housing and Urban Development (HUD). When submitting a discrimination grievance to HUD, it is helpful to include:

- Your name and contact information,
- The name and contact information of the person(s) or organization that your grievance is against,
- The address or other identification of the housing or program involved,
- A short description of the event(s) that cause you to believe your rights were violated, and
- The date(s) of the alleged violation.

Housing discrimination grievances can be submitted to HUD by completing an [online form](#), by calling 1-800-669-9777, or by printing and completing a [form](#) and mailing it to San Francisco Regional Office of FHEO, U.S. Department of Housing and Urban Development, One Sansome Street Suite 1200, San Francisco, CA 94104. For more

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information about how to report housing discrimination to HUD, please visit [HUD's website](#).

### **What if I am not satisfied with the response to my grievance?**

If you have exhausted all levels of appeal and are not satisfied with the response you received, you can contact the US Department of Housing (HUD). You can contact HUD by visiting their [website](#).

You can also contact the HUD Regional Office by writing to San Francisco Regional Office of FHEO, U.S. Department of Housing and Urban Development, One Sansome Street Suite 1200, San Francisco, CA 94104, calling 415-489-6400, or completing [this form](#).

## Attachment 1: What To Expect When Reporting a Grievance

Here is an overview of the steps you may have to take when submitting a grievance. Remember that there may be variations in grievance policies for different entities and types of grievances.



## Attachment 2: Grievance Policy Request Template

To Whom It May Concern:

I am contacting you to request a copy of the grievance policy and procedure for [insert name of program or organization here].

If you do not have a written grievance policy and procedure, please provide the following information:

- The types of grievances your entity reviews,
- How to submit a grievance to your entity,
- What information should be included in the grievance,
- How your entity will investigate and attempt to resolve the grievance,
- How I will be notified of your entity's decision regarding my grievance, and
- How I can appeal the decision if I do not agree with it.

You can provide me with grievance policy and procedure by contacting me at:

\_\_\_\_\_.

Sincerely, \_\_\_\_\_

**Attachment 3: Key Terms**

This section includes definitions of key terms that are used throughout this document. [EveryOne Home](#), the Oakland, Berkeley/Alameda County Continuum of Care (CoC), also maintains an [Acronym Glossary](#) that can be a helpful resource for understanding terms, jargon, and acronyms commonly used by the CoC.

Term	Description
<b>Clarity</b>	<b>Clarity</b> is the name of the Homeless Management Information System (HMIS) software. Sometimes people say “clarity” when they are referring to HMIS.
<b>Complaint</b>	A <b>complaint</b> is any statement about something you think is a problem in a program or organization. Depending on the <b>complaint</b> , it could be filed as a formal grievance. But oftentimes general complaints about services or a staff member cannot be defined as formal <b>grievances</b> .
<b>Continuum of Care</b>	A regional or local planning body that coordinates housing and services funding for homeless families and individuals. A <b>Continuum of Care</b> is also a program administered by the Department of Housing and Urban Development (HUD) aimed at addressing homelessness. The program's goal is to promote a community-wide commitment to ending homelessness. The program provides funding to nonprofit organizations, state, and local governments to quickly rehouse homeless individuals and families.
<b>Entity</b>	<b>Entity</b> is whoever you are filing the grievance with. This can be an organization, a specific program in an organization, or systems like Coordinated Entry or HMIS.
<b>EveryOne Home</b>	<b>EveryOne Home</b> is another name for the Oakland, Berkeley/Alameda County Continuum of Care.
<b>Grievance</b>	A <b>grievance</b> is an official statement of a complaint about something you believe is wrong or unfair, with the potential for formal action to resolve the grievance. Grievances can be filed about things like program rules, staff behavior, housing decisions, or access to services.

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<p><b>Grievance Policy</b></p>	<p>A <b>grievance policy</b> is written rules for HUD CoC-funded programs, Coordinated Entry, and HMIS entities about what standards they must meet for grievances.</p>
<p><b>Grievance Procedure</b></p>	<p>A <b>grievance procedure</b> is the process for how someone files a grievance and how it is reviewed and resolved.</p>
<p><b>Homeless Management Information System (HMIS)</b></p>	<p><b>HMIS</b> is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.</p>
<p><b>HUD CoC-Funded Programs</b></p>	<p><b>HUD CoC-Funded Programs</b> are programs that receive money from the HUD Continuum of Care grant. Only certain types of housing programs within certain organizations receive funding from the HUD CoC-Program. You can ask the organization or program manager if the program you are participating in is funded by the HUD CoC grant.</p>
<p><b>Participant</b></p>	<p>A <b>participant</b> is the individual who is directly receiving the services and/or housing from an organization.</p>
<p><b>Program</b></p>	<p>A <b>program</b> is a set of services or resources. An organization, agency, or non-profit likely has multiple <b>programs</b> designed for different people or need. For example, "Keep People Housed" is just one <b>program</b> offered by the organization "Bay Area Community Services."</p>
<p><b>Remedy</b></p>	<p>A <b>remedy</b> is a legal term. A legal <b>remedy</b> is a court-ordered way to enforce your rights, compensate or correct a harm, or overall correct what went wrong.</p>