



## Updates to CT BOS Grievance Policy – Adopted by Steering Committee 1/20/23

### **Background:**

In October 2022, CT BOS received a grievance from a PSH participant. Among the issues noted was difficulty obtaining accurate information about the client's due process rights. The Grievance Committee met on 10/25/22 to review the grievance and concurred that the client was provided with erroneous information about the grievance process. The committee recommended that: 1) the CT BOS Steering Committee consider amending the grievance policy to clarify the processes available to participants; 2) CT BOS provide a written notice regarding the CT BOS Grievance Policy for CoC project participants; and 3) projects be required to provide that notice to participants.

In addition, the Grievance Committee met on 7/22/22 to review grievances submitted by providers related to renewal evaluation scores. The committee recommended amending the grievance policy to clarify limitations on grievances.

Proposed amendments to the CT BOS Grievance Policy (see directly below) and a draft Notice of Grievance Rights (see page 5) are contained in this document.

### **Proposed Amendments to CT BOS Grievance Policy**

## **VII. Grievances**

### **1. Purpose**

The purpose of the CT BOS Grievance Policy is twofold:

- A. To ensure that there is a fair and accessible process for providers and Steering Committee members to file a grievance with the CoC regarding decisions made during the CoC funding process (See Section 5 below).
- B. To ensure that there is a fair and accessible process for consumers served by CT BOS projects who have filed a grievance with a CT BOS CoC funded provider, are dissatisfied with the outcome and wish to file a grievance with the CoC (See Section 6 below).

### **2. Filing a Grievance**

Grievances submitted by provider agencies and Steering Committee members shall be submitted in writing to the Grievance Committee via e-mail ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)).

Consumer grievances can be submitted to the CT BOS Grievance Committee in writing via e-mail ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634.

### **3. Composition of Grievance Committee**



The Grievance Committee shall be made up of a minimum of three members of the CT BOS CoC Steering Committee. Members shall be appointed by the CT BOS CoC Steering Committee Co-Chairs. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee. (see CT BOS Policies, Article VIII, Section 1).

#### **4. Final review by the CT BOS Co-Chairs**

All Grievance Committee decisions may be appealed to the CT BOS Steering Committee Co-Chairs within 10 working days of receipt of the committee's written decision. In instances in which a co-chair recuses, another Steering Committee member who was not involved in the decision being appealed may be appointed to participate in the final review. The final review shall be completed within 15 working days of receipt of the request. Within 10 working days of the review, the chairs shall issue a written decision specifying the reasons for the decision. The written decision shall be mailed or emailed to the person who filed the grievance by first class mail, and a copy will be maintained in the CT BOS project files. The decision is final and cannot be appealed.

#### **5. Grievance Policy for Providers and Steering Committee Members**

This policy should be used when a provider or Steering Committee member wishes to file a grievance related to the CoC funding process. For instance, a project may file a grievance to appeal a project evaluation result or the rejection of a project for CoC funding.

##### **a. Resolution of a Grievance**

Grievances will be reviewed by the Grievance Committee within 30 days of receipt. The committee will issue a written decision, specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request a final review by the CT BOS Steering Committee Co-Chairs, and provide instructions for requesting the final review, including contact information. The written decision will be emailed to the person filing the complaint.

##### **b. Limitations on Grievances for Providers and Steering Committee Members**

Each year, the CT BOS Steering Committee approves the renewal evaluation scoring standards prior to initiating the evaluation. The CoC distributes draft standards in advance and encourages comment. In order to ensure equity, scoring is applied consistently to each program.



The Grievance Committee will not consider grievances based on disagreements with the evaluation standards adopted by the Steering Committee. Rather providers who believe the criteria or performance targets should be adjusted or certain types of projects should be exempted or have different targets should coordinate with their CAN Steering Committee representative, attend the relevant Steering Committee meeting or submit an email to [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com). The Steering Committee will consider all such comments received prior to establishing the annual standards.

CT BOS establishes a standardized process that applies criteria and benchmarks established by the Steering Committee equitably across all projects. To ensure the equitable application of the standards, the Grievance Committee will not consider grievances based on circumstances that are commonly experienced across projects. For example, the Grievance Committee will not consider grievances based on a challenging housing market, staff turnover, or housing stability challenges commonly faced by participants.

CT BOS establishes a standardized process that provides the same opportunity for all projects to make data changes in advance of obtaining the APR data used to evaluate projects. Subsequently, providers are also provided the opportunity to review their preliminary renewal evaluation results, make additional data changes and request that their project be re-scored. Deadlines for each step are distributed, and providers receive multiple reminders. In order to ensure equity, deadlines are, generally, applied consistently to each program. Where there are extenuating circumstances that prevent a project from meeting a deadline, the CoC chairs may approve extensions. The Grievance Committee will not consider grievances based on data changes made after the deadline.

## 6. Grievance Policy for Consumers

This policy can be used by consumers who have filed a grievance related to a CT BOS CoC funded project with a provider agency and who remain dissatisfied with the outcome. Consumers must first complete any grievance process available to them through the relevant CT BOS funded agency prior to filing a grievance with CT BOS. Consumers must file the grievance within 30 days of having received notification of the outcome of the grievance filed with the relevant provider agency. Relevant issues may include determinations of service or housing subsidy terminations, repair issues, discrimination, mistreatment, or other disputes or complaints.



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If the project serving the consumer is a DMHAS project (i.e., DMHAS is the CoC grantee or the project receives other DMHAS funding), the consumer must use the DMHAS Appeals Process (available at: <http://www.ctbos.org/wp-content/uploads/2017/04/1-Final-DMHAS-Rental-Help-Admin-Plan-June-2017-1.pdf>). The DMHAS Appeals Process includes the following steps:

- 1) Informal conference with the relevant CAN
- 2) Hearing with a DMHAS appeals panel
- 3) Final review by a Review Panel.

The outcome of the DMHAS Appeals process is final and not subject to review through the CT BOS Grievance process.

If the project serving the consumer is a RRH project, the consumer must file a grievance in accordance with the policies defined in the [CT DOH Statewide RRH Operations Guide](#). If the project serving the consumer is a different type of DOH project (i.e., DOH is the CoC grantee for a project other than RRH or the project receives other DOH funding) or the grievance is about a Coordinated Access Network (CAN) decision, the grievance will be reviewed via the CT BOS Grievance Process described in this Section (Section 6).

Consumers who would like help determining which grievance processes are available to them may contact a staff member at the agency at which they receive services or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634.

### Grievance Committee Hearing Process for Consumers

When a consumer submits a grievance to the CT BOS Grievance Committee, a hearing shall be held within 30 working days of the receipt of the grievance. A notice regarding the hearing shall be mailed to the consumer by first class mail and email, if applicable, not less than 10 days before the scheduled hearing. The notice shall include the date, time, and location of the hearing and a clear statement of the issues to be considered.

The consumer who filed the grievance must have the opportunity to be present during the hearing and to hear all oral information and review all written information that is being considered by the Grievance Committee. They must also have the opportunity to bring a person of their choice to assist them during the hearing. Consumers who would like help identifying someone who can assist them may contact a staff member at the agency at which they receive services or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634.



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A member of the Grievance Committee shall keep a sign-in sheet of all who attended the hearing and a list of the documents presented. If the consumer opts not to attend the hearing, the Grievance Committee may, in lieu of convening a hearing, opt to review the grievance and gather all pertinent information via email, phone, or video conference. Such a review must be completed within 30 days of receipt of the grievance.

Within 10 working days of a hearing or other review process, the Grievance Committee shall issue a written decision specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request within 15 days a final review by the CT BOS Steering Committee Co-Chairs, and provide instructions for requesting the final review, including contact information. The written decision shall be sent by first class mail and email, if applicable, and a copy will be maintained in the CT BOS project files.

### **Notification**

CT BOS funded projects and Coordinated Access Networks (CANs) are required to notify all households seeking or receiving help of their grievance rights. All CANs and CT BOS funded projects are required upon application, at project entry and at a minimum annually to provide a notice issued by CT BOS summarizing these rights and to review that notice with participants/applicants to help them understand their grievance rights.



## INFORMATION FOR CONTINUUM OF CARE PROJECT PARTICIPANTS ABOUT

### YOUR RIGHT TO FILE A COMPLAINT

#### **INSTRUCTIONS FOR CANS & PROVIDERS:**

CT BOS funded projects and Coordinated Access Networks (CANs) are required to:

- 1) Document provision of this notice to all households seeking or receiving help upon application, at project entry and at a minimum annually; and
- 2) Review the content of this notice with CoC project participants and applicants to help them understand their grievance rights.

#### **YOUR RIGHT TO FILE A COMPLAINT**

If you are receiving help from or were denied help by a Coordinated Access Network (CAN) or Connecticut Balance of State (CT BOS) project you have a right to file a complaint. If you have a problem with the help you get or a problem with not getting the help you need, you can try reaching out first to a staff person at the agency that provides or denied you the service.

If that doesn't work you might want to make a formal complaint, which is also called a grievance.

#### **HOW DO I FILE A GRIEVANCE?**

The process available to you to file a grievance depends on what type of help you are receiving or were denied. For help determining which of the processes below applies to you, contact a staff member at the agency where you receive housing assistance or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634.

#### **CT BOS Grievance Process**

##### **Who can use the CT BOS Grievance Process?**

- People who have a problem with the housing assistance they are receiving from or were denied by a Coordinated Access Network (CAN)
- People who have a problem with housing assistance they are receiving from or were denied by most projects funded by the Connecticut Balance of State Continuum of Care (CT BOS) – exceptions are explained below.

##### **What are the steps?**

1. File a grievance with the agency that provides you with housing assistance or denied you the help you need. Ask the provider agency for a copy of their grievance procedure.



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2. If you are unhappy with the results you can, file a grievance with CT BOS at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634. You must do this within 30 days of receiving the outcome of the original grievance you filed under step #1.
3. If you are still unhappy with the results you can, request a final review by the CT BOS Co-Chairs at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634. You must do this within 15 days of receiving the outcome of the grievance you filed under step #2.

For more information see: [CT BOS Policies](#)

## **Connecticut Rapid Rehousing (RRH) Grievance Process**

### **Who can use the CT RRH Grievance Process?**

- People who have a problem with help they are receiving from or were denied by any Rapid Rehousing (RRH) project funded by the CT Department of Housing or the CT Balance of State Continuum of Care (CT BOS)

### **What are the steps?**

1. Fill-out a [Participant Concern Form](#) and give it to a staff person at your RRH provider agency. You must do this within 15 days of the occurrence of the situation you are filing a concern about.
2. If you are unhappy with the results, you can file a grievance with your RRH provider agency. Ask the provider agency for a copy of their grievance procedure.
3. If you are still unhappy with the results you can, file a grievance with CT BOS at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634. You must do this within 30 days of receiving the outcome of the original grievance you filed under step #2.
4. If you are still unhappy with the results you can, request a final review by the CT BOS Co-Chairs at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634. You must do this within 15 days of receiving the outcome of the grievance you filed under step #3.

For more information see: [DOH Statewide RRH Operations Guide](#)

## **Connecticut Department of Mental Health and Addiction Services (DMHAS) Grievance Process**

### **Who can use the CT DMHAS Grievance Process?**

- People who have a problem with help they are receiving from or were denied by any Continuum of Care project funded through the CT Department of Mental Health and Addiction Services (DMHAS). Usually these are Permanent Supportive Housing (PSH) projects.



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## What are the steps?

1. Complete an [informal conference request form](#) and submit it to your local [Coordinated Access Network](#) (CAN) or the agency where you get housing assistance.
2. If you are still unhappy with the results you can, complete a [formal hearing request form](#) and send it to Alice Minervino ([Alice.Minervino@ct.gov](mailto:Alice.Minervino@ct.gov) or Department of Mental Health and Addiction Services, Russell Hall, Housing and Homeless Services, PO Box 351, Middletown, CT 06457-7023). You must do this within 15 working days of receiving the outcome of the original grievance you filed under step #1.
3. If you are still unhappy with the results you can, request a final review by the DMHAS Review Panel. You must do this within 15 working days of receiving the outcome of the grievance you filed under step #3. You will receive a final review request form and instructions on how to submit with the notice you receive about the outcome of the grievance you filed under step #3.

For more information see: [DMHAS CoC Rental Assistance Operating Guide](#)

## HOW CAN I GET HELP?

For help contact a staff member at the agency where you receive housing assistance or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (860) 375-4634.