



Housing for Health System of Care Complaint and Grievance Policy

Document Properties

Document Name	Housing for Health Partnership Continuum of Care Complaint and Grievance Policy
Approval Date	MM/YY
Next Review Required By	MM/YY
Approver/ Approving Entity	Housing for Health Partnership Policy Board
Contact Person	Full Name and email address of responsible party

1. Introduction

The Housing for Health Partnership (H4HP) is the federally designated Continuum of Care (CoC) for Santa Cruz County and oversees the Housing for Health System of Care (H4H System). H4HP provides a process for submitting grievances, complaints, and feedback about housing and service programs funded to assist people experiencing or at risk of homelessness. Such grievances can be submitted by participants, provider staff, or other interested parties.

Grievances generally involve policy or legal violations, or serious misconduct or negligence related to a program. Grievances typically involve situations that have a meaningful impact on a participant's ability to access, receive, or fully benefit from services or housing.

Examples of grievances may include, but are not limited to:

- Denial of or exit from services or housing in a manner that is inconsistent with program or H4H System policies
- Discrimination or harassment based on a participant's membership or perceived membership in a protected class
- Breach of confidentiality or improper handling of personal information
- Failure to provide services or supports required under program guidelines
- Staff misconduct, negligence, or actions that result in harm or significant barriers to participation

Grievances must follow the formal process outlined in this policy. The Housing for Health Division ("H4H Division") of the County of Santa Cruz oversees the grievance process on behalf of H4HP, ensuring consistency, accountability, and alignment with applicable CoC adopted policies, federal, state, and county standards. The H4H Division may administer this process directly or contract with a qualified third party to receive, review, investigate, and resolve complaints and grievances. When a complaint or grievance involves H4H Division

staff or presents a real or perceived conflict of interest, the review will be conducted by a neutral party within the County of Santa Cruz or by a third party engaged to review grievances.

If assistance is needed to submit a grievance, participants may contact the H4H Division by emailing info@housingforhealthpartnership.org, calling (831) 454-7312, or completing an online form [insert link]. H4H Division staff or a neutral party within the County will be available to help participants complete the Grievance Form and will provide reasonable accommodation if needed.

2. Definitions

Complaint: A concern or expression of dissatisfaction about housing or services that does not involve serious misconduct or negligence, or a rule violation. Complaints are not managed through the formal grievance process.

Continuum of Care (CoC): A geographically based group of representatives that carries out the planning responsibilities of the Continuum of Care program pursuant to U.S. Department of Housing and Urban Development (HUD) regulations [24 CFR 578](#). These representatives come from organizations that provide services to the homeless or represent the interests of those at risk of homelessness, experiencing homelessness, or formerly homeless.

CoC Governing Body: A local or regional planning body that coordinates housing and services funding for people experiencing homelessness.

Coordinated Entry System (CES): The system of program access, needs assessment, and prioritization developed by a Continuum of Care pursuant to [24 CFR 578.7\(a\)\(8\)](#) (CoC Program), [24 CFR 576.400\(d\)](#) (ESG Program), and associated HUD requirements and guidance.

Emergency Solutions Grant (ESG): A federal funding program that provides funding for homelessness prevention, rapid rehousing and essential shelter and supportive services.

Feedback: General input, suggestions or comments about program operations or participant experience. Feedback does not require a formal response but is valuable for program improvement. Examples of feedback include sharing a positive experience, recommending a change to program hours or suggesting new services or resources.

Grievance: A formal report of a policy or legal violation, or serious misconduct or negligence associated with a program that receives federal, state or local funding. Examples include being inappropriately terminated from a program, experiencing discriminatory or disrespectful treatment or a violation of program rules.

Homeless Management Information System (HMIS): A local information technology system used to collect client-level information and track the provision of housing and services for individuals and families experiencing or at risk of homelessness. Each Continuum of Care

(CoC) is responsible for overseeing an HMIS that complies with HUD's data collection, management and reporting standards.

3. Policy Scope

This policy applies to programs within the H4H System who:

1. Receive federal, state, or local funding requiring participation in or collaboration with the Housing for Health Partnership (H4HP), the Watsonville/Santa Cruz City and County Continuum of Care (CoC);
2. Hold a contract with the H4H Division; and/or
3. Have a formal partnership agreement to participate in the H4H System.

It covers all individuals and households participating in these programs, as well as agency staff and community members who interact with them or contribute to HMIS data.

- **An agency grievance** pertains to concerns regarding a housing or service provider agency or its staff. Examples may include experiencing discriminatory treatment, being denied services the participant believes they were eligible for or actions that put a resident's health or safety at risk.
- **A Coordinated Entry (CE) grievance** refers to a concern regarding the process used to connect people experiencing homelessness with housing and services. Examples may include perceiving discriminatory or disrespectful treatment by a Connector during an assessment or believing they were excluded from housing opportunities for which they should have been considered.
- **A Homeless Management Information System (HMIS) grievance** refers to any concern related to the collection or storage of information within the data system used for individuals receiving homeless services. Examples may include personal information being recorded incorrectly or information being shared without proper consent.

The policy supports and implements relevant federal, state, and local regulations, including CoC and ESG program rules, applicable state funding requirements, and locally adopted standards and ordinances. Programs are explicitly excluded from this policy if they do not receive CoC or ESG funding, do not participate in HMIS, and are not otherwise governed by a funding source or administrative structure that involves H4H System oversight or infrastructure. Where changes in regulation or law create discrepancies between this policy and those regulations or laws, the regulations or laws prevail.

4. Complaints and Feedback

In addition to grievances, participants and others may submit complaints or feedback.

- A complaint is a concern or expression of dissatisfaction about some aspect of housing or services that does not involve misconduct or a rule violation. Complaints generally relate to service quality, communication, or administrative issues. Examples may include excessive wait times for services, unclear paperwork or challenges scheduling appointments.
- Feedback refers to general input, suggestions or positive comments intended to improve programs. Examples may include recommending a change to program hours, proposing new services or sharing positive experiences.

Complaints and feedback may be submitted by contacting H4H directly (by email, phone, or the online form) or can be submitted directly to the agency providing services. Complaints and feedback are important parts of continuous improvement in the H4H System, but are out of scope for the grievance process.

H4H will review all complaints and feedback submitted to it. If, upon review, a complaint meets the criteria for a grievance, the H4H Division may explore escalating the complaint to a grievance handled in accordance with the grievance procedures established in this policy.

Complaints and feedback submitted directly to H4H through this process will be shared with the relevant agency or agencies, on an as-needed basis, to support addressing specific or ongoing issues. Agencies are not required to notify H4H of their response to complaints and feedback but should acknowledge receipt to the participant and must provide information to participants on the process for submitting complaints and feedback, as outlined in section 6.1.

An excessive number of complaints, or patterns of similar complaints that may indicate a potential performance concern, may prompt additional review by H4H and may result in monitoring activities or requests for information or response from the relevant agency.

5. Grievance Policy

This policy establishes consistent standards across the H4H System for how grievances are handled and resolved. It ensures that:

- All partner agencies have a written grievance, complaint, and feedback policy that meets the minimum requirements outlined in Section 6.1.
- Participants are protected from retaliation, discrimination, or unfair treatment when raising a grievance.
- Grievances are investigated impartially and resolved in a timely manner, with opportunities for escalation when needed.
- Grievance data is tracked and reviewed to identify trends, improve services, and strengthen accountability across the System.

The goal of this policy is to create a transparent, fair, and accessible process that promotes accountability and high-quality programs and services. The policy aims to protect the rights of participants, staff, and other community members who interact with the H4H System.

6. Agency Grievance, Complaint and Feedback Procedures and Requirements

All agencies participating in the System must maintain written grievance, complaint, and feedback policies and procedures.

6.1 Minimum Requirements of an Agency Grievance, Complaint, and Feedback Policy

Agency policies must include the following:

1. Protocols to prevent conflict escalation and foster a positive program environment for participants and staff. Whenever possible, programs are encouraged to resolve disputes informally through direct conversations between staff and participants, mediation by a neutral staff member, clarification of policies or collaborative care conferencing.
2. Agency policies must include a process for collecting and responding to participant complaints and feedback. While these do not require the formal grievance process, agencies must:
 - Provide participants with simple ways to submit complaints and feedback (verbally, in writing, or electronically).
 - Acknowledge receipt of complaints and feedback.
3. Language affirming participants' rights to file a grievance without fear of retaliation or discrimination, along with a written anti-retaliation and nondiscrimination policy.
4. Procedures for participants to request assistance with filing a grievance directly with the agency.
5. A statement outlining circumstances under which a grievance may be filed directly with H4H (as stated in section 6.2), including if a grievant does not want to utilize the agency process for any reason, and procedures for requesting assistance with filing a grievance directly with H4H.
6. A statement that participants are not required to use the agency's grievance process before filing a grievance directly with the H4H Division.
7. A statement on grievance confidentiality, specifying that grievance information will be shared only with the participant and essential staff involved in the issue or with a role in helping resolve it, and that all documentation will be maintained separately from participant supportive service records.

6.2 Agency Responsibilities for Sharing and Managing Grievance, Complaint, and Feedback Policies

All agencies subject to this policy must:

1. Post the grievance, complaint and feedback policy and procedure, at a minimum in English and Spanish, in a location that is clearly visible and accessible to participants.
2. Provide a copy of the policy and procedure to the participant:
 - At program admission, alongside other required participant materials
 - At the time of a warning or discharge/exit notice, unless safety or emergency circumstances prevent it
 - Any time the participant requests the information
3. Inform participants that third-party advocates are available through the H4H Division or a contracted agency to support participants who are filing a complaint or grievance directly with H4H. Whenever possible, agencies should offer to connect the participant with an H4H advocate or H4H-designated intermediary and provide reasonable assistance to facilitate that connection.
4. Report any grievances the agency receives involving a serious allegation, such as a legal violation or gross misconduct. The agency must report the matter in writing to H4H within five business days. Grievances related to CES, HMIS or other system-level functions must also be reported in writing within the same timeframe.
5. Maintain documentation of all grievances for a period of at least three years. This documentation is subject to review by the H4H Division.
6. Provide the following information as part of the regular program reporting cycle:
 - The number and types of grievances received
 - How grievances were resolved
 - A disaggregated count based on each provider's best available knowledge of the number of people submitted grievances who are members of protected classes, including by race, ethnicity, gender, and disability.
 - Any systemic issues or patterns observed
7. Include a process for collecting and responding to participant complaints and feedback. While these do not need to be addressed through the formal grievance process, agencies must:
 - Provide participants with simple ways to submit complaints and feedback (verbally, in writing, or electronically).
 - Acknowledge receipt of complaints and feedback.

In compliance with [California Assembly Bill \(AB\) 130](#), emergency shelters must also:

- Undergo an annual inspection conducted by the city or county housing department or code enforcement unit, which may be announced or unannounced.
- Prominently display a notice of occupant rights, including the process for reporting complaints about substandard conditions and the appropriate contact information.
- Provide the same notice of rights in writing to all new participants at intake.

Agencies that fail to comply with these requirements may be subject to corrective action or monitoring by H4H staff.

7. H4H Grievance Procedures

The following steps outline the process for submitting a grievance to H4H. To review a visual representation of these steps, view the Participant Grievance Policy Process Flow.

7.1.1 Step 1 - Grievant Completes Agency Grievance Process (not required)

Grievants are encouraged to first pursue resolution through the provider agency's internal grievance process. If a grievant does not want to utilize the agency process for any reason or if the grievance concerns the Coordinated Entry System (CES) or Homeless Management Information System (HMIS), a grievant may submit their grievance directly to H4H.

7.1.2 Step 2 - File Grievance with Housing for Health

The H4H Grievance Form serves as the standard tool for documenting grievances to H4H. Grievances may be submitted in alternative formats, provided they contain the necessary information. Acceptable formats include:

- Verbal submission in person or by phone to H4H staff or an agency staff person, who should, in turn, document the grievance on the Grievance Form and return to H4H.
- Email or letter containing substantially the same information requested on the Grievance Form.

Participants are not required to complete the form themselves and may seek assistance from a third party such as an advocate, case manager, family member, or peer. Participants may submit a grievance in their preferred language.

Participants must submit a grievance within 90 days of the date the action giving rise to the grievance occurred.

7.1.3 Step 3 - Investigation of Grievance

The H4H Division will review all grievances upon receipt to determine whether the grievance presents a reviewable issue. If the grievance is not reviewable, H4H will notify the grievant in writing and close the matter.

To be considered reviewable, a grievance must involve a policy or legal violation, or gross misconduct or negligence by a program, an agency, or by program or agency staff within the System. An issue is considered reviewable only when:

- A substantial problem, meaning the problem has a meaningful impact on the participant's experience, rights, access to services, or program environment, is clearly stated in the grievance; and

- The agency or program identified has the legal capacity or authority to address the issue(s) raised.

Examples of reviewable grievances include, but are not limited to:

- A participant being wrongfully exited from a program without due process or required notice.
- An agency denying services unfairly based on race, disability, gender identity, or another protected status.
- A program failing to follow funding requirements, such as refusing eligible Coordinated Entry referrals.
- Gross misconduct by staff, such as harassment, verbal abuse or breach of confidentiality.
- Negligence creating unsafe or harmful conditions for participants (e.g., unaddressed safety hazards in housing).
- Improper use, disclosure or mishandling of HMIS data.

The H4H Division may conduct investigations directly or may assign the investigation to a neutral party within the County of Santa Cruz or to a contracted third-party grievance administrator.

If a grievance involves H4H Division staff, the CES, HMIS, or another system-level function for which the H4H Division has administrative responsibility, the grievance will be referred to a neutral party within the County of Santa Cruz or to a contracted third-party reviewer to avoid any real or perceived conflict of interest.

Grievances involving urgent health or safety concerns shall be prioritized and when feasible, resolved on an accelerated timeline.

H4H will acknowledge receipt of any grievance within ten business days, or two business days in the case of health or safety concerns (e.g., pest infestation, violence against a client).

If the grievance is reviewable, the assigned reviewer (H4H staff or third-party reviewer) may contact the grievant to determine whether the matter can be resolved without a formal investigation. If resolved informally, the reviewer must provide written documentation describing the resolution.

If a formal investigation is required, the assigned reviewer will:

1. Provide written notice to the agency in question and request a written response
2. Interview relevant parties and review documentation as needed

Following the investigation, the assigned reviewer will document findings and determine appropriate resolution steps.

7.1.4 Step 4 - Resolution of Grievance

Within 30 business days of when the response is received, designated H4H staff will document their investigation using Part Three of the form and will provide the findings and any follow-up needed to the agency. H4H will then complete and send Part Four of the Grievance Form to the grievant by their preferred method of contact (mail or email). If the grievant prefers verbal communication, H4H will also contact them by phone to provide a verbal summary of the form's contents, in addition to the mailed or emailed copy. This includes a summary of the grievance, findings, and next steps. Care should be taken not to disclose confidential information to the grievant, such as personnel actions taken.

The results will be shared with the participant within this 30-day period. The participant will then review Part Four, sign to acknowledge receipt, and indicate whether they are satisfied with the outcome or if they would like to appeal the outcome, as described in section 7.1.5. The participant can also give a verbal acknowledgement of receipt and response. H4H staff will note on the form the date participant gave a verbal response. The signed form is then returned to H4H for either closure of the matter or escalated to an appeal.

If the participant would like to file an appeal to the results of the grievance investigation, they must do so within 90 days of when the results were sent via mail or email or communicated to them verbally.

Possible resolution paths include:

- **Non-reviewable grievances:** If the issue is not reviewable (as defined in Step 3), H4H will notify the grievant in writing with an explanation and close the matter.
- **Reviewable grievances that do not require a formal investigation:** If the grievance can be resolved informally, for example through direct resolution of the grievance by the agency before the formal investigation or if the participant no longer wants to pursue a grievance with contacted, H4H will document the resolution and require the agency to provide written confirmation of the steps taken for resolution if applicable.
- **Reviewable grievances requiring a formal investigation:** H4H will issue formal findings and will describe the recommended and mandated steps for resolution, which may include:
 - The agency resolving the issue directly with the impacted individual
 - The individual being offered reentry, reassessment or reprioritization for housing or services
 - The agency implementing a corrective action plan, which may include adjusting internal policies to prevent recurrence
 - Referral of the agency by H4H to oversight or enforcement resources (e.g., Environmental Health) for possible follow-up action
 - Formal censure of an agency or, if necessary, withdrawal of funding.

The grievance process may include two phases: (1) review and issuance of written findings and required actions, and (2) an agency response describing how it will comply. Each phase may take up to 30 business days, resulting in a total process of up to 60 business days. Shorter timelines may be required for grievances involving health, safety, or other urgent concerns. Grievances involving urgent health, safety, , or similar concerns will be reviewed and resolved in less than 30 business days.

7.1.5 Step 5 - Appeal of Grievance Findings

Grievance findings can be appealed by the participant who filed the grievance or by the agency against whom the grievance has been filed if either party is unsatisfied with the resolution or required action steps.

Upon notice of an appeal, H4H Division is responsible for identifying a reviewer within the County, or a neutral third-party reviewer if the grievance involves HMIS, CES, or the County. The reviewer will assess the grievance, all investigative steps taken to date, and any proposed resolution actions. The reviewer will then issue written findings that either uphold the original grievance findings and steps for resolution or alter them based on the appeal and review.

Within 30 business days after the reviewer completes their recommendation, the H4H Division Director will review the recommendation and render a final decision. The H4H Division will communicate the outcome of the appeal to the affected parties. If the grievance being appealed involves the H4H Division Director, the Human Services Department Director will review the recommendation and communicate final outcome of the appeal.

The outcomes of the appeals process are final.

7.1.6 Step 6 - Closing a Grievance

A grievance is considered closed when:

- The assigned reviewer (H4H Division staff, a neutral County party, or a contracted third party) completes the investigation and issues written documentation to the grievant and the agency, including findings, recommendations, and required actions.
- An appeal (if made) has been resolved.
- The agency receiving the written findings, recommendations, and required actions provides a written response within 30 business days describing how it will address the grievance.

H4H will notify the grievant in writing when the grievance is closed and will verify implementation of corrective actions as part of its regular monitoring process.

7.2 Other Grievance and Complaint Options

Some programs within the H4H System may offer additional complaint or grievance processes beyond those described in this policy. Participants are not limited to this process and may choose to submit concerns through other available channels, including directly to a program funder, regulatory agency, or oversight body, when applicable.

Examples include:

- Participants may file complaints related to publicly funded health and human services programs through the California Department of Social Services (CDSS), where applicable.
- Allegations of discrimination, harassment, or unequal treatment in housing, shelter, or services may be filed with the California Civil Rights Department (CRD). CRD accepts complaints from any individual in California who believes they experienced discrimination based on a protected characteristic (such as race, disability, gender identity, or religion), regardless of whether the program is publicly or privately funded. Complaints may also be filed by someone acting on behalf of the impacted individual, such as an advocate, family member, or legal representative.
- Participants receiving services in federally funded housing or homelessness programs may also file fair housing or civil rights complaints with the U.S. Department of Housing and Urban Development (HUD).

Participants may consider filing with CRD or HUD when concerns involve potential violations of fair housing or civil rights laws, including discriminatory denial of services or housing, harassment, or unequal access to programs.

Use of an external complaint or enforcement process does not preclude a participant from also filing a grievance with H4H. Likewise, H4H may review or respond to matters that are referred back to the H4H System, to the extent they fall within H4H's authority.

7.3 Oversight and Monitoring

H4H Division staff will actively monitor whether partner agencies have an internal grievance policy in place and ensure policies meet the minimum standards outlined in this document. Monitoring methods will include periodic reviews of agency policies during annual CoC compliance monitoring visits, required policy submission during contract onboarding or renewal and follow-up when grievances are escalated to the H4H Division.

When corrective actions are issued as part of a grievance resolution, H4H staff will monitor the agency's implementation of those actions to ensure compliance. This may include requiring written updates by the agency, reviewing documentation of steps taken or verifying

changes during monitoring visits. Failure to implement corrective actions may result in additional oversight measures or potential impacts on funding.

H4H staff will track and review aggregate grievance data annually and share trends with the Operations Workgroup. Reviews will assess the types of grievances filed, resolutions, training needs, and potential system enhancements.

7.4 Retaliation and Nondiscrimination

Agencies and participants who wish to file a grievance must be able to do so without fear of retaliation or discrimination from the accused party or any representative associated with them.

Retaliation means taking negative action against someone because they filed a grievance. Examples of retaliation include harassment, intimidation, threats, program dismissal, denial of services, or use of profane or derogatory language.

Discrimination means treating someone unfairly or differently because they filed a grievance. Examples of discrimination include being excluded from opportunities, denied services, or given worse treatment than other participants.

H4H will take immediate steps to stop retaliation and discriminatory activities. These steps may include, but are not limited to:

- Technical assistance
- A Corrective Action Plan or Monitoring Plan
- A written report of the grievance and retaliation to program funder(s)
- Discontinuing funding

Designated H4H staff will request supporting documentation from the alleged victim of retaliation or harmful discrimination to substantiate claims. Supporting documentation may include police reports, emails and eyewitness statements.

8. Policy Location

This policy is available on the Housing for Health Partnership Policy and Procedure webpage: [Insert Link Here]. Agencies must also provide copies to participants upon request.

Appendix A

Cross Reference and Resources

Cross References

Housing for Health System of Care Systemwide Standards

Coordinated Entry Policies and Procedures

HMIS Policies and Procedures

Resources

Housing for Health Partnership Grievance Form

Participant Grievance Policy Process Flow

Sample Poster for Communicating Compliant Policy Terms to Program Participants