

Grievance Procedures Manual Draft Cover Page

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I. INTRODUCTION

A. Background

The Continuum of Care (CoC) is a federal grant program created by the U.S. Department of Housing and Urban Development (HUD) to promote community-wide commitment to the goal of ending homelessness, increase access and utilization of homeless services, and distribute funding to support and quickly rehouse people experiencing homelessness. The mission of Nashville- Davidson County's CoC is to create a collaborative community-based process and approach to planning and managing effective homeless assistance resources and programs. The CoC is made up of an array of community partners working hand-in-hand to support a housing crisis resolution system that strives to effectively end homelessness for all people in Nashville and Davidson County. The CoC's governing body is served by the Homelessness Planning Council (HPC) and its committees.

Differences and disagreements are natural to occur within such a large, important body of stakeholders within the CoC. However, there is no required or advised grievance process from HUD (outside of tenant rights) regarding issues that may arise from within the CoC. Other regional CoC's across the state and nation have varying procedures regarding this, if they have one at all. Over the years, the Nashville-Davidson County CoC General Membership (GM) has raised this as a concern that should be addressed and an initial draft was attempted during our Governance Charter Committee's revision process in 2024. However, due to Nashville's unique CoC structure, the effort proved to be complicated and worthy of deeper focus and exploration before adding a new process to the Charter at the time. It was recommended by the Governance Charter committee to establish an Ad Hoc Task Force to draft Grievance Procedures to be added to the CoC Charter.

In April 2025, the HPC Chair approved the creation of an Ad Hoc Task Force - Initiatives Efficiency - which included the task to address grievance procedures for the CoC. The task force includes a diverse representation of people with lived experience, homeless serving agency staff, and community members committed to this important cause. The task force met regularly to hold robust discussion, gather and analyze research, utilize systems mapping tools to create a framework and drafted the first iteration of this manual. The goal is for this manual to be reviewed, modified and approved by the CoC GM, the HPC and subsequently part of a new revision of the CoC charter, to be considered in effect for Spring 2026.

B. Purpose

The Nashville-Davidson County Continuum of Care (CoC) is committed to providing a transparent process to address problems as they arise within the Continuum of Care. All service recipients and CoC members should feel comfortable that their complaints will be addressed promptly, fairly, and without fear of retaliation. Problems are best addressed as close to the source as possible, and the CoC encourages resolution of problems through internal processes.

All CoC-funded agencies are expected to maintain internal grievance processes that ensure prompt and fair attention to issues as they arise, and that guard against retaliation. To the extent issues are not able to be resolved within individual agencies, the CoC has established this policy to govern how grievances may be brought to the CoC.

C. Scope/Eligibility

This policy applies to:

- Individuals receiving services from CoC-funded programs.
- Staff and leadership of CoC-funded and member organizations.
- CoC committees, subcommittees, and the Homelessness Planning Council.
- The Collaborative Applicant, Coordinated Entry Lead, and HMIS Lead.
- Decisions regarding CoC funding allocations, policy changes, and program implementation.

This policy **does not** directly apply to, but offers alternative considerations for:

- Non-COC funded programs.
- Non-COC affiliated members of the general public.
- Criminal offenses, of which should be filed and addressed by a court of law.

D. Grievance Definition and 5 Guiding Principles

Grievance is defined as a complaint, formal or informal, about a real or imagined wrong that causes resentment or a feeling of injustice.

- Encourage resolution at the lowest possible level
- Ensure non-retaliation against those who file grievances
- Maintain confidentiality and impartiality
- Resolve grievances in a timely manner
- Ensure accessibility (language, disability accommodations)

E. Anti-Retaliation Statement

Anyone participating in the CoC has the right to file a grievance if they have a complaint regarding CoC matters. The Nashville-Davidson County CoC affirms that people who wish to file a grievance have the right to do so without retaliation from the party accused or any associated representative. Retaliation includes, but is not limited to; harassment, intimidation, violence, program dismissal, refusing to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract.

The Nashville/Davidson County CoC will take immediate steps to stop retaliation and prevent its recurrence. These steps will include, but are not limited to:

a. Technical Assistance

b. Complying with a Corrective Action Plan

c. Written report of grievance and retaliation to program funder(s)

d. Discontinuing CoC Funding (Decision made at the discretion of the CoC Homeless Planning Council)

The CoC Collaborative Applicant will request supporting documentation from the alleged victim of retaliation to substantiate all claims. Supporting documentation may include: police reports, emails, and eyewitness statements.

F. References and Contact Information

The following links and resources are frequently referenced within the contents of this document:

For feedback and questions regarding this Grievance Procedures Manual, please contact ?????

II.

QUICK REFERENCE GRID

Aggrieved Party → Grievant ↓	COC Funding Allocation						
Service Recipient	COC Committee/ Member						
COC Member	Homeless Planning Council/ Member						
COC-Funded Agency	COC-Funded Agency						
	HMIS Lead						
	Coordinated Entry Lead						
	Collaborative Applicant						

III. GRIEVANCE PROCEDURES

A. COLLABORATIVE APPLICANT

The **Collaborative Applicant (CA)** is the organization designated by the CoC to submit the CoC Registration and CoC Consolidated Application to HUD, and apply for CoC planning funds on behalf of the CoC, during the CoC Program Competition. In November 2023, the CoC General Membership designated the **Metro Office of Homeless Services** as CA Lead for a five-year period. **The Performance Evaluation Committee (PEC)** is an unbiased group that oversees the grant applications and ranking of grant proposals from CoC programs which the CA consolidates and applies during funding competition periods. In addition, the PEC can be a body that reviews grievances towards the Collaborative Applicant if grievance is related to a matter within their role and responsibilities as collaborative applicants. For grievances related to services from Metro Office of Homeless Services, those should follow the process noted under grievances toward a COC funded agency in **Section ***** of this manual. For grievances related to funding allocation and ranking decisions, reference **Section ***** of this manual.

Regardless if you are an individual of the public, a service recipient, CoC member, or CoC-funded provider, any and all grievances of the Collaborative Applicant should go through the same following process:

For COC-funded providers where the internal grievance process does not first resolve the matter, then it should be addressed to the **Performance Evaluation Committee (PEC) Chair(s) via public comment** procedure made available for their committee meetings as scheduled on **OHS website**. It is advised but not required to utilize the **Grievance Form** available on OHS Website or in person at all committee meetings. The PEC may confer with the Collaborative Applicant, the Homelessness Planning Council and/or its Executive Committee to assist with resolving the matter. As a final measure, **HUD** is always an option to file a grievance with if matters cannot be resolved locally.

- **Note** that for all steps of the process, there are specific categories of grievances that can be addressed. Violations of **specific Continuum of Care policies or laws** can be submitted as a formal grievance with the Performance Evaluation Committee. Other circumstances may be reviewed at the Committee's discretion.

Please reference the following **link** for more information regarding grievance process towards the Collaborative Applicant.

B. COORDINATED ENTRY LEAD

Coordinated Entry (CE) is a shared community-wide intake process intended to match all people experiencing homelessness with certain available community resources that are best able to help them sustain safe and affordable housing. The U.S. Department of Housing and Urban Development (HUD) requires each Continuum of Care (CoC) to establish and operate a coordinated entry process. The CE Lead manages CE operations and administrative functions, including staffing and managing budget and grant requirements. The **Coordinated Entry Oversight Committee** is responsible for recommending policy guidance for the Homelessness Planning Council and CE Lead on issues related to the implementation of the CE process.

The current Coordinated Entry Lead is the **Metro Office of Homeless Services**.

Regardless if you are an individual of the public, a service recipient, CoC member, or CoC-funded provider, any and all grievances of the Collaborative Applicant should go through the same following process, as outlined in Section IX of the **Coordinated Entry Manual**:

If there is a grievance in regard to the CE process as outlined in the CE Manual, then email **CEhelp@nashville.gov** with the names of those involved, the best contact information for them, and a description of the grievance. The CE Lead's CE Manager will respond to grievances within two to three business days. If the grievance concerns the CE Manager, it will be forwarded to their direct supervisor—the Assistant Director of Programs—for review and response.

If there is a grievance regarding particular providers accepting and making referrals through CE, then this should be first addressed and filed according to the provider's internal grievances procedures. **(Click here for current list of COC-funded providers and their grievance procedures)**. Should the person not be satisfied with the appeal decision they have the right to appeal that decision to the board of the agency, and if not resolved to the participant's satisfaction, then appeal to the entity that awarded the funding.

For COC-funded providers where the internal grievance process does not first resolve the matter, then it should be addressed to the **CE Oversight Committee Chair(s) via public comment** procedure made available for their committee meetings as scheduled on **OHS website**. It is advised but not required to utilize the **Grievance Form** available on OHS Website or in person at all committee meetings. The CE Oversight Committee may confer with the relevant COC-funded agency and/or the Homelessness Planning Council and/or its Executive Committee to assist with resolving the matter. As a final measure, **HUD** is always an option to file a grievance with if matters cannot be resolved locally.

- **Note** that for all steps of the process, there are specific categories of grievances that can be addressed. These include appeals of provider decisions if based on discrimination such as denial of services, denial of request to add a member of the household, or termination of services after acceptance into the program. Other circumstances may be reviewed at the Committee's discretion.

Please reference the following **link** for more information regarding grievance process towards the Coordinated Entry Lead.

C. HMIS LEAD

The **Homeless Management Information System (HMIS)** 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 experiencing or at-risk of homelessness. It is used as a tool to evaluate people's needs and assist them more effectively, avoiding duplication of services. The current designated HMIS Lead responsible for administering an effective communitywide HMIS was elected by the CoC General Membership to be the **Metro Office of Homeless Services**.

The **Data and HMIS Oversight Committee** promotes and ensures the collection of quality, comprehensive and relevant data about people experiencing homelessness in Nashville/Davidson County and the efforts of the CoC to address and end homelessness here. In addition to HMIS policy guidance, this Committee can be a body that reviews grievances towards the HMIS Lead if grievance is related to a matter within their role and responsibilities as the HMIS Lead.

Regardless if you are an individual of the public, a service recipient, CoC member, or CoC-funded provider, any and all grievances of the HMIS Lead should go through the same following process, as outlined in **HMIS Policies and Procedures Manual - Grievance Policy 5.6:**

Clients who suspect that an HMIS Participating Agency or end user has violated HMIS policies and procedures or other governing documents should follow the process described in the **Corrective Action portion of Policy 3.2** within the HMIS Policies and Procedures Manual.

In cases where a client leaves one HMIS Participating Agency to receive services from another HMIS Participating Agency and reports a suspected violation by the first agency, the new HMIS Participating Agency may file a grievance on the client's behalf, as long as the client grants their permission to do so.

For COC-funded providers where the internal grievance process does not first resolve the matter, then it should be addressed to the **HMIS Lead (s) via public comment** procedure made available for their committee meetings as scheduled on **OHS website**. It is advised but not required to utilize the **Grievance Form** available on OHS Website or in person at all committee meetings. The HMIS Lead Committee may complete an investigation, conferring with the relevant COC-funded agency, the Homelessness Planning Council and/or its Executive Committee to assist with resolving the matter. As a final measure, **HUD** is always an option to file a grievance with if matters cannot be resolved locally.

- **Note** that for all steps of the process, there are specific categories of grievances that can be addressed. These include suspected violations of HMIS Policies and Procedures or laws governing the storage of, sharing of, and access to data in HMIS. Other circumstances may be reviewed at the Committee's discretion.

Please reference the following **link** for more information regarding grievance process towards the HMIS Lead.

D. COC-Funded Agency

Each agency funded by the Continuum of Care is required to have their own grievance policy. The collaborative applicant maintains compliance with this policy and may be a source to reference if there is a grievance with the COC-funded agency that cannot be internally resolved.

Typically, agency grievances are brought upon by a service recipient to their immediate case worker, then up a chain of leadership to reach resolution. For a [list of current COC-Funded agencies/programs and their internal grievance policies](#), click [here](#).

If the agency cannot reach resolution internally, then an issue can be brought forth to the Collaborative Applicant via [\(PEC? Grievance Form? OHS email?\)](#)

- **Note** that the Collaborative Applicant can only confer on grievances that violate policies such as [code of conduct, HUD regulations and discrimination](#) of a protected class.

Non-COC funded agencies or their COC member representatives cannot be required but are encouraged to adopt similar internal grievance policies, with this manual as a resource.

Non-COC members of the public should reasonably inquire with the specified agency representative to seek resolution of COC-funded agency grievances first before the option of bring forth the issue to the Collaborative Applicant for support on a matter that could not be resolved internally for an agency they fund. The CA via [\(PEC? Grievance Form? OHS email?\)](#) may review the grievance with the agency or HUD at their discretion.

E. HOMELESSNESS PLANNING COUNCIL / MEMBER

The Continuum of Care's **Homelessness Planning Council (HPC)** is a 25-member governance board for Nashville-Davidson County's Continuum of Care, which coordinates the funding and delivery of housing and services to end homelessness in our community. The Homelessness Planning Council is held to the Continuum of Care Governance Charter as well as all applicable Continuum of Care policies, procedures, and bylaws. The Homelessness Planning Council is subject to state and local laws for governing bodies.

Informal Process

Concerns from CoC members and the broader community can be made by reaching out directly to members of the Homelessness Planning Council and/or participating in the Public Comment Period at Homelessness Planning Council meetings.

Internal Process

Conduct concerns can be addressed during meetings utilizing decorum guidelines within Robert's Rules of Order. Concerns related to the conduct of the Homelessness Planning Council Chair or Vice Chair can be addressed as a point of order or vote of no confidence. **For a quick reference guide to Robert's Rules of Order, [click here](#) or see Section X of this manual.**

Formal Process

Ethical violations of members of the Homelessness Planning Council may be submitted to the [Metro Board of Ethical Conduct](#).

Grievances against a member of the Homelessness Planning Council regarding a violation of Continuum of Care policies and/or applicable laws are to be submitted via the CoC Grievance Form.

Grievances between Homelessness Planning Council members should be navigated **using an alternative solution as provided in Section X of this manual.**

F. COC COMMITTEE / MEMBER

Roberts Rules of Order

1) related to committee decisions

2) between committee members

3) members having issues with the chair.

G. COC FUNDING ALLOCATION

The Performance Evaluation Committee (PEC) is an unbiased group that oversees the grant applications and ranking of grant proposals from CoC programs, which the Collaborative Applicant consolidates and applies during funding competition periods. For grievances related to funding allocation and ranking decisions, the PEC offers an appeals process. Only an applicant organization can participate in this appeals process.

If an applicant organization objects to a decision made by the CoC Homeless Planning Council regarding the ranking, rejection, or funding level of their project, or unsubstantiated by project performance, the applying agency may file an appeal to be considered by a **three-member Appeals Committee within the time frame specified in HUD's annual Notice of Funding Availability (NOFA)**. The appeal must be based on one of the following:

- Agency did not receive information made available to other agencies;
- Allegation of bias, fraud, or misuse of federal funds on the part of the CoC Planning Council and/or the CoC Performance Evaluation Committee;
- Allegation that CoC Planning Council and/or the CoC Performance Evaluation Committee did not receive accurate information for proper scoring; and/or
- Violation of federal guidelines.

IV. ALTERNATIVE PROCEDURES (AS APPROVED)

A. Grievance Forms

A structured document has been created to formally record a complaint about an issue (See Grievance Form in Section XX of this manual). This serves as an optional first step in a formal grievance procedure in order to clearly document concerns, gather evidence and initiate a process for a fair and timely resolution to the matter. This form will be made available at all CoC affiliated meetings as well as available to be submitted via online at (OHS link). The form will be submitted either in person or online to the Continuum of Care Manager, or affiliated Collaborative Applicant role. This form may be completed anonymously, but understand that it may render the Committee unable to directly facilitate the grievance process without knowing the affected party.

The form's information will be confidentially provided to the CoC's Executive Committee for review. This committee is made up of the officers of the CoC HPCS and up to three additional HPC members appointed by the Chair of the HPC. The Executive Committee is responsible for setting the agenda for the HPC meetings and carrying out any specific tasks given to the committee and attend to any urgent business provided necessary within the HPC policies and strategic plans. Grievance procedures are an important process of the CoC of which the Executive Committee can fill a role in managing and monitoring the process for compliance.

The Executive Committee will be expected to review the grievance form provided by the CoC Manager within a week of their monthly set Executive Committee meetings. The person who filed the grievance may attend this meeting in person to speak on their grievance during the meetings public comment period. The Executive Committee will assign follow up procedures, which will include direction on the appropriate avenue to hear and process the grievance. The Executive Committee will not issue a final decision regarding the grievance but rather serve as a supportive liaison for the process to be properly implemented. Members of the Executive Committee who may have or appear to have a conflict with the grievance shall abstain from participation in the facilitation of this process.

Once a grievance form is submitted, the grievant should reasonably expect an update regarding their submission within 60 days. The grievant may also submit this form directly to the appropriate entity without Executive Committee review based on the direction provided in this manual.

B. Third Party Mediation

Third-party Mediation is a flexible dispute resolution process in which an impartial third party helps disputing parties negotiate a mutually acceptable solution for a civil matter. Unlike an arbitrator, a mediator does not have the power to impose a decision but instead facilitates communication and guides the parties toward a collaborative, self-determined agreement. Mediation is not legally enforceable and comes with no guaranteed settlement however it does

bring confidentiality, time-efficiency and creative solutions for situations that both parties wish to voluntarily reach resolution for. Mediation services often comes with a cost, that can be covered within the Collaborative Applicants funding, if desired. **Nashville Conflict Resolution Center**, or agreed upon private mediation consultants, are options for this service.

C. Grievance Review Panel

A proposed alternative solution involves a small panel of unbiased reviewers to facilitate the process and resolutions of the grievance. This would be a special called workgroup that is separate from any other current CoC committee tasked with hearing and mediating grievances brought within the CoC. This workgroup should include, but not limited to, people with skills in the fields of: lived experience, mediation, human resources, conflict management, legal services, counseling, and advocacy work. The Nominating and Membership Committee may assist with recruiting and selecting voluntary representatives for this workgroup, of which the CoC GM will approve a final vote of its members. The CoC GM will further agree upon the roles and responsibilities of this panel, that will serve as it's agreed resource for grievance proceedings henceforth.

D. Restorative Justice Practitioner/Coach*

Restorative Justice is a new paradigm that seeks to reframe the way we conventionally think about wrongdoing and justice by seeking resolution that affords healing, reparation and reintegration, and prevents future harm. Restorative justice is a principle-based approach that does not serve the purpose of minimizing the conflict and maximizing corporate interests, but it rather accepts the situation of conflict and extensively deals with the negative consequences for the people involved. Restorative justice philosophy expands beyond typical mediation formats by focusing on identifying needs and repairing harm, active accountability, and centering relationships and community. This can be an ideal solution for situations that don't have clear policy and are more of a personal transgression that is still worthy of repair and restoration in order to be a healthy functioning CoC body.

A restorative justice practitioner is a professional who facilitates structured, facilitated dialogues between those harmed and those responsible for harm, along with community members, to address the impact of an offense and find ways to repair it. They are trained in restorative principles to promote accountability, healing, and conflict resolution, working in community organizations and systems to foster empathy, understanding, and reintegration into the community. This can be in the form of circles or groups, conference trainings or one to one coaching. Options for restorative justice that can be utilized locally include...

** Information regarding this section came from source:*

Maximilian J. L. Schormair & Lara M. Gerlach, 2020. "Corporate Remediation of Human Rights Violations: A Restorative Justice Framework," Journal of Business Ethics, Springer, vol. 167(3), pages 475-493, December.

V. Nashville-Davidson County CoC Grievance Form

Your name: _____

Your contact information:

Details of grievance – Please be specific as to dates, times, locations, list of others involved, and policy/procedure/rule being challenged.
Steps taken to resolve the grievance, and what do you feel should be done to resolve this?

With my signature, I understand that this information may not remain confidential in order for the CoC to help resolve my grievance. I understand that this form will be reviewed by members of the CoC Executive Committee/Grievance Review Panel, and may be shared with the Homeless Planning Council and the party I am grieving against, as applicable. I understand the CoC's commitment to anti-retaliation when sharing the above information.

Signature: _____

Date: _____