

Nashville-Davidson County Continuum of Care (CoC)

INITIATIVES EFFICIENCY MEETING MINUTES

DATE: JUNE 2, 2025

LOCATION: Oasis Center

TIME: 2:30PM

FACILITATORS	Alyssa Fernandez, Oasis Center
RECORDED BY	Raquel de la Huerga, OHS Continuum of Care Manager
ATTENDANCE	Alyssa Fernandez (Oasis Center), Raquel de la Huerga (OHS), Liz Mallard (Lived Experience, HPC, Nominating & Membership), Raven Nye (The Contributor), Ares Miller (VUMC), Tim Leeth (Lived Experience, former HPC), Kennetha Patterson (Lived Experience, Innovative JOBS Solutions LLC, HPC Chair), Steve Reiter, Shanley Deignan (Park Center), Nelson Guillen (Mandala, NOAH),

AGENDA ITEM	DISCUSSION
UPDATES	Alyssa asked attendees to notify her if they wish to serve in an official capacity on the Task Force. Alyssa will then send names to the HPC chair for approval. Raquel shared that she is working with OHS' public information officer on a monthly newsletter to capture key content that was requested by the General Membership. Raquel will work on a draft and send to the Task Force for review.
GRIEVANCE PROCEDURES	Alyssa shared that the Governance Charter Committee worked on draft Grievance Procedures last year, but they were not fully finalized or incorporated into the CoC Charter. OHS staff shared that the Charter Committee faced many challenges in figuring out procedures for each potential permutation for grievances that could be raised within the CoC. OHS engaged HUD Technical Assistance to learn about HUD expectations for Grievance Procedures, but they shared that there is not a singular template. The committee also struggled with figuring out what the end of the Grievance Process should look like and where appeals could be taken. Committee members were provided the original draft from the Charter Committee and five examples from peer cities. An attendee noted that it will be important to establish a review panel for grievances who can be impartial and unbiased in reviewing concerns. The attendee noted the importance of a fair hearing to investigate and make determinations. The attendee noted situation where there was a grievance between two agencies, however, there was no process or review panel to address that concern. An attendee wondered if it might be better to potentially establish a review panel first. Chair Fernandez noted that many of the peer cities that have established grievance procedures have already established review panels, noting that all examples encouraged an internal process before it is raised to a higher level. Attendees also noted the potential need for an outside mediator, however, if that would need to be a paid position there could be a conflict depending on who is paying for their services. A suggestion was made to have a panel of volunteers who are not connected to any organization, but there could be concerns based on who would appoint people to those positions. Members suggested for there to be a review panel similar to the CoC's Performance Evaluation Committee, which requires that its members do not have conflicts of interest.

Nashville-Davidson County Continuum of Care (CoC)

INITIATIVES EFFICIENCY MEETING MINUTES

An attendee shared that MDHA has a hearing officer that they retain for these situations, however, in their setup, the MDHA Board had the power to ratify, modify, or reject the hearing officer's findings. The hearing officer is paid for by MDHA using federal funding.

An attendee named that the process needs to be iron-clad regardless of how individuals operate within the process. Attendees noted that outside mediators may not be as familiar with HUD, state, and local laws, in addition to parameters from the CoC Charter. An attendee noted that the facts and circumstances will need to be presented in a way that mediators may not need to be fully informed on all levels of law and policy.

An attendee asked what should happen if both sides in a grievance do not agree once the process has been completed. Members emphasized that there needs to be some end point and closure for the process. Members noted that the minimum goal is to provide a process so that there are avenues for people within the CoC to have their issue heard. Members felt that it would be important that the grievance process and relief need to be reasonable. Attendees noted wanting due process to reach a point of resolution. Members noted that historically the CoC has not had a standardized grievance process for any situation or any person.

Shanley shared that she is a member of the Charter Committee, which postponed this task because it became so complicated. A single process for any CoC grievance didn't fit the Nashville structure well—especially given the number of potential conflicts of interest. Ultimately, people experiencing homelessness do have a grievance process through the Coordinated Entry (CE) Policies and Procedures Manual and internal processes established at each CoC-funded agency.

An attendee noted that in the legal world, Chancery Court handles issues of fairness, often using a three-person arbitration panel. The attendee posed whether something similar be included in the CoC process? An attendee noted that Metro Legal has participated in mediation in the past but cannot represent the entire CoC.

Attendees agreed that if a formal system is established, everyone needs to be on board. Funded agencies will need to sign Memoranda of Understanding, and if they don't agree to participate in the Grievance Process, there might need to be ramifications. Agencies may also need to forfeit jurisdictional concerns in order to comply with uniform standards.

At a basic level, the CoC is a conduit for federal funding. Attendees noted that there needs to be a process for clients that also incorporates diversion strategies—ideally resolving issues before they escalate to formal grievances. Attendees noted that every issue needs to go through a formal grievance process. Sometimes grievances are filed just to document something, not necessarily to trigger a full hearing.

An attendee noted that some members of the General Membership (GM) voted down the last iteration of the Charter because it lacked a grievance procedure. If a procedure is to be included in the Charter, it would need to go to the Governance Charter Committee and then be voted on by the GM. Attendees noted that someone

Nashville-Davidson County Continuum of Care (CoC)

INITIATIVES EFFICIENCY MEETING MINUTES

needs to take responsibility for moving this forward. There was consensus that many of the decisions ahead are foundational and will require community feedback.

Attendees noted that a Review Panel would need to understand: who is filing the grievance, who the grievance is against, what the circumstances are, and what appeal processes are available. There would need to be a finding of facts. Members drafted the following outline for the process:

- Grievance Submission
- Advocate Assigned
- Opportunity for Internal Reconciliation
- Review Panel
- Written Ruling
- Relief
- Outline Opportunities for Appeal

Attendees felt that members of the review panel should be trained mediators, lawyers, HR representatives, therapists, people with familiarity with HUD requirements, etc.

In the example Grievance Procedure from St. Louis, Section #2, Subsection B, it requires all agencies to have an internal grievance policy. Attendees noted that it may be helpful to review those agency policies, which are also part of OHS monitoring. These policies could be brought to this Task Force for review and used as a starting point. Attendees also noted that it would be helpful to link to agency-level grievance procedures within the final Grievance Policy. Members also wanted to review examples from other cities of grievance forms and anti-retaliation policies.

Members suggested to look through the example policies to find clauses that would be helpful to carry over into Nashville's Grievance Policy, such as Miami's parameters around preventing returns to homelessness. Miami's policy also listed that members of the Review Panel should be a 3rd party professional trained in behavioral health and certified in restorative justice practices.

Attendees suggested that grievance proceedings not be held in public, while others wanted to ensure there wasn't a violation of the Tennessee Open Meetings Act. Members also wondered what should be done if one party in the grievance wanted the process to be done publicly and the other did not. An attendee suggested to look into whether grievance proceedings could be treated as executive sessions, for which there are exemptions under the Tennessee Open Meetings Act. Steve offered to reach out to MDHA to learn more about their grievance process and whether it is done publicly. Members were also curious if other CoCs held their hearings publicly.

Members noted that they will need to figure out what relief could be provided via the grievance process and if the Review Panel would have the authority to take specific action. If not, the process may need to rely on internal grievance procedures within agencies.

Attendees suggested potentially having advocates that could help guide people with lived experience through the grievance process. Attendees noted that the process should be as simple as possible and outlined with simple language.

Nashville-Davidson County Continuum of Care (CoC)

INITIATIVES EFFICIENCY MEETING MINUTES

	An attendee noted that it would be important to separate grievance-related discussions from those focused-on solutions. Resolving this structural question would be necessary to ensure that space dedicated to solving problems isn't derailed by unresolved complaints. Members reviewed the five example Grievance Policies to understand how the process works and potential concepts or clauses for Nashville to adopt. Attendees noted that it will be important for Nashville's Grievance Process to outline the document based on types of situations and potential avenues where grievances could be heard. Attendees noted that the Grievance Policy should encourage utilizing agency-level internal processes first, and then, if needed, grievances could be escalated to be brought to the Review Panel. In severe circumstances and when applicable, grievances could also be brought to HUD or Metro Government. Members suggested to potentially brainstorm how any proposed grievance process could work based on hypothetical cases from other communities.
NEXT STEPS	• Reach out to the five peer CoCs that we reviewed Grievance Policies. The goal of this task should be to learn more about their process, challenges they have experienced with their process, anything they would change/recommend, and any additional clarification that might be helpful. Here are the assignments for who was going to reach out to each CoC: • Nelson & Kennetha - Maimi-Dade County, FL CoC • Shanley - Memphis-Shelby County, TN CoC • Liz - Durham, NC CoC • Ares - Wake County, NC CoC • Steve - St Louis, MO CoC • Ares will add the restorative practices resources he has identified into a dedicated folder on SharePoint • Steve will look into MDHA's Grievance Process • Tim will look into applicable state laws, with a focus on whether grievance proceedings need to be held publicly. • Raven will look into Grievance Forms and work on an initial draft • Raquel will pull relevant language from other CoC documents regarding Grievances (e.g. CE Manual, Standards of Care). • The Task Force will review everyone's research at the July meeting and work to outline a pilot Grievance Process. • Alyssa and Raquel will work on gathering feedback at the All Chairs Meeting on what committees need support with in accomplishing their Strategic Plan responsibilities. • At the July meeting, the Task Force will work to create their 6-month plan.