

Nashville-Davidson County Continuum of Care

Grievance Policies & Procedures Manual



Submitted for Public Comment on 10/08/2025

Final Revisions approved by Initiatives Efficiency Ad Hoc Task Force on
12/01/2025

CoC General Membership Vote on 2/19/26

****All bolded/underlined words of this manual will be made into a
hyperlink prior to the final approved release****

TABLE OF CONTENTS

I.	Introduction	3
	A. Background	3
	B. Purpose.....	4
	C. Definition and Guiding Principles.....	4
	D. Scope.....	5
	E. Anti-Retaliation Statement.....	5
II.	Grievance Form Process.....	6
III.	Grievance Policies and Procedures	7
	A. Collaborative Applicant	7
	B. Coordinated Entry Lead.....	8
	C. HMIS Lead	9
	D. CoC-Funded Agency	10
	E. Homelessness Planning Council / Member	11
	F. CoC Committee / Member	12
	G. CoC Funding Allocation	13
IV.	Nashville-Davidson County CoC Grievance Form	14



I. INTRODUCTION

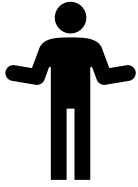
A. Background

A 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 re-house 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 Homelessness Planning Council (HPC) is the governing body of the Nashville-Davidson County CoC.

Differences and disagreements are natural to occur within such a large, important body of stakeholders within the CoC. However, outside of tenant rights, there is no required or advised grievance process from HUD regarding issues that may arise from within the CoC. 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 the CoC's Governance Charter Committee's revision process in 2024. However, the effort proved to be complicated and worthy of deeper focus and exploration before adding to the Charter at the time. The Governance Charter committee recommended establishing an Ad Hoc Task Force to draft Grievance Procedures.



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 included a diverse representation of people with lived experience, homeless service 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 version of this Grievance Policy and Procedures manual. The goal is for this manual to be reviewed and approved by the CoC GM, the HPC and subsequently part of a revision of the CoC's charter, in effect by Spring 2026.



B. Purpose

The Nashville-Davidson County Continuum of Care (CoC) is committed to 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 required 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 and procedures.

C. Grievance Definition and 5 Guiding Principles

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

We are guided by the following principles:

1. *Encourage resolution at the lowest possible level*
 - Emphasize direct, informal communication, and empower individuals to solve problems together before escalating issues up a formal chain of command. This strategy builds relationships, increases efficiency, and fosters a collaborative culture.
2. *Propose non-retaliation against those who file grievances*
 - Establish clear non-retaliation policies, provide comprehensive anti-retaliation training and education, foster a "speak up" culture where concerns can be raised without fear of negative consequences, and implement strong response and monitoring systems.
3. *Maintain confidentiality and impartiality where possible*
 - Protect sensitive information using secure platforms, assign neutral investigators, foster a culture of transparency and accountability, establish clear protocols to identify and address potential bias, and avoid conflicts of interest to ensure fairness and trust.
4. *Endeavor to resolve grievances in a timely manner*
 - Establish a clear, well-communicated grievance policy with set deadlines for each stage. Initiate a formal process by having a written complaint form, conduct a fair and thorough investigation with timely meetings and communication, and provide a clear decision.
5. *Support accessibility*
 - Make information understandable and usable for everyone by creating content in plain and preferred language, providing alternatives for visual and auditory media, using clear visual design with sufficient color contrast, and structuring content logically with headings and accessible forms.

D. Scope

By scope we mean the extent to which this policy may address a variety of grievances but this is not a complete list. This policy manual is not the ultimate advisor or authority on personal decisions regarding grievance resolution.

This policy aims to address:

- Individuals receiving services from CoC-funded and CoC-affiliated organizations
- Staff and leadership of CoC-funded and CoC affiliated 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 may not address:

- Non-CoC affiliated organizations, of which may be addressed directly with the non-CoC affiliated organization
- Criminal offenses and civil trial matters, of which may be filed and addressed by a court of law
- Housing discrimination, of which may be addressed directly with HUD



E. Anti-Retaliation Statement

Anyone participating in the CoC has the right to file a grievance without fear of 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. People with lived experience of homelessness engaging within the CoC are a particularly vulnerable group that should be protected from retaliation for candor, whistle-blowing, or public critiques of governing bodies. In the event that a retaliation is reported, the CoC Collaborative Applicant should work to investigate, intervene, and prevent future retaliation. Strategies for addressing retaliation may include, but are not limited to:

- | | |
|---|--|
| • Technical Assistance | • Issuing a Corrective Action Plan or Performance Improvement Plan |
| • Safety Planning and Training | • Reallocating Continuum of Care funding |
| • Issuing a Notice of Findings, based on supporting documentation that is submitted | |

Any substantiated retaliation concerns and the strategy to alleviate grievance should be brought from the Collaborative Applicant before the Homelessness Planning Council for final approval. If the CoC Collaborative Applicant or Homelessness Planning Council member/s are the subject of concern, the matter may be brought forth to the Metro Board of Ethical Conduct or HUD.

II. GRIEVANCE FORM PROCESS



A structured document has been created to formally record a complaint about an issue (See Grievance Form in Section IV 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 online at ([Link Coming Soon](#)). The form will be submitted either in person or online to the Continuum of Care Manager, or another designated Collaborative Applicant role. This form is subject to the **Tennessee Public Records Act** should it be formally requested, with sensitive information withheld where able. This form may be completed anonymously, but it should be understood that it may mean that a reviewing party may be limited in their means to substantially facilitate the grievance process without knowing the affected party. The form should be completed by the aggrieved party and should not be completed on someone else's behalf, except in circumstances where a reasonable accommodation is needed or one is submitting information as a direct witness to the grievance situation.

The form's information will be provided to the **HPC's Executive Committee** for review at their public meeting. This committee is made up of the officers (Chair/Vice Chair) of the CoC HPC 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, carrying out any specifics tasks given to the committee and attending to any urgent business within the HPC policies and strategic plans.

The Executive Committee will be expected to review the grievance form provided by the designated Collaborative Applicant role within a week of their monthly scheduled Executive Committee meetings. The person who filed the grievance may attend this meeting in person to speak during the meetings public comment period if they wish but it is not required in order for the matter to be addressed. 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 related to the grievance are encouraged to abstain from participation in this process, or demonstrate objectivity.

Once a grievance form is submitted, the grievant should expect an update within 60 days. The grievant may also submit this form directly to the appropriate entity without Executive Committee review based upon the directions provided within this manual. Repeat submissions from the same grievant for the same situation should be avoided once resolved through this process, however this does not prevent filing grievances elsewhere.

III. GRIEVANCE POLICY AND 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** (OHS) as CA Lead for a five-year period.

The Performance Evaluation Committee (PEC) is a group that rates and ranks all local grant proposals for annual CoC funding. Upon charter updates, the PEC is designated as the body that reviews grievances against the CA. Grievances related to client services from Metro Office of Homeless Services should follow the process noted under grievances toward a CoC-funded agency in Section III Part D of this manual. For grievances related to funding allocation and ranking decisions, reference Section III Part G of this manual.

Whether filed by a member of the public, a service recipient, CoC member, or CoC-affiliated provider, grievances against the Collaborative Applicant should go through the following process:

If the OHS' internal grievance process does not resolve the matter, it should be addressed to the PEC via public comment at their committee meetings listed on **OHS' website**. It is advised, but not required, to utilize the **Grievance Form**, available on OHS Website and a hard copy at all committee meetings. The PEC may confer with the Collaborative Applicant, the Homelessness Planning Council and/or its Executive Committee to resolve the matter. If matters cannot be resolved locally, the grievance should be directed to **HUD Field Office** staff for resolution.

- **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.

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 to the Homelessness Planning Council and CE Lead on issues related to implementation. The current Coordinated Entry Lead is the **Metro Office of Homeless Services**. Grievances of the CE Lead should go through the same following process, as outlined in Section IX of the **Coordinated Entry Manual**:

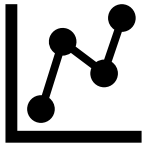
If there is a grievance in regard to the CE process as outlined in the CE Manual, then email **CEhelp@nashville.gov** with the names of those involved, the best contact information for them, and a description of the grievance. The CE Lead's CE Manager will respond to grievances within two to three business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

If there is a grievance regarding particular providers accepting and making referrals through CE, this should be first addressed and filed according to the provider's internal grievances procedures as further noted in Section 3 Part D of this manual. Should the person not be satisfied with the decision they have the right to appeal that decision to the board of the agency.

If the agency's internal grievance process does not resolve the matter, then it may be addressed to the CE Oversight Committee via public comment at their committee meetings listed on **OHS' website**. It is advised, but not required, to utilize the **Grievance Form**, available on OHS Website and a hard copy at all committee meetings. The CE Oversight Committee may confer with the relevant 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 for the CE Lead. 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.

C. HMIS LEAD



The Homeless Management Information System (HMIS) is a local information technology system used to collect client-level 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 community-wide 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 in this area. In addition to HMIS policy guidance, this Committee can be a body that reviews grievances against the HMIS Lead if grievance is related to a matter within their role and responsibilities as the HMIS Lead.

Whether filed by a member of the public, a service recipient, CoC member, or CoC-affiliated organization, all grievances against the HMIS Lead should go through the 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.

If the internal grievance process does not resolve the matter, then it may be addressed to the Data and HMIS Oversight Committee 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 and hard copy in person at all committee meetings. The Data and HMIS Oversight Committee may complete an investigation, conferring with the relevant 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.

D. COC-FUNDED AGENCY



Each agency funded by the Continuum of Care is required to have a grievance policy. The Collaborative Applicant (CA) 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 forth 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](#).

Current Nashville/Davidson-County CoC-funded agencies as of 02/19/2026 are:

*Metropolitan Development & Housing
Agency*

Oasis Center

Office of Homeless Services

Park Center

Room in the Inn

Safe Haven Family Shelter

The Contributor

The Mary Parrish Center

The Salvation Army

Urban Housing Solutions

If the agency cannot reach resolution for the service recipient internally, an issue can go to the Collaborative Applicant via the grievance form process, which will be addressed by OHS' Assistant Director of Planning and Research. The matter may also be addressed by any of the alternative procedure methods advised in Section IV of this manual.

- **Note** that the Collaborative Applicant can only confer on CoC-funded agency grievances that violate policies such as **code of conduct, HUD regulations and discrimination** of a protected class.

Members of the public should first inquire with the specified agency representative to seek resolution. If not resolved internally, public members have the option of bringing forth the issue to the Collaborative Applicant for resolution of policy violations via the Grievance Form submission process. The CA may review the grievance with the agency or HUD at their discretion.

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

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, that coordinates the funding and delivery of housing and services to end homelessness in our community. The HPC is held to state and local laws for governing bodies as well as the CoC's Governance Charter and all applicable CoC policies, procedures, and bylaws.

Concerns from CoC members and the broader community about HPC processes, decisions or meeting agenda items are best addressed transparently in the public comment period at HPC meetings. These meetings and the process for public comments can be found **here**. It is the HPC's discretion on how they choose to address general procedural grievances, which may include further public deliberations, technical assistance consultation and/or drafting a formal public response regarding the matter at subsequent public meetings.

Grievances against the Homelessness Planning Council regarding a violation of specific Continuum of Care policies and/or applicable laws may also be addressed via public comment and/or be submitted via the CoC Grievance Form. For a reference of those policies and laws that may be considered, click **here**. If not able to be immediately addressed during the public meeting, the matter may be further reviewed by the HPC's Executive Committee for direction on the appropriate avenue to hear and process the grievance. 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.

Due to the HPC being created as a government board/commission, ethical violations by a member/s of the Homelessness Planning Council may be submitted to the **Metro Board of Ethical Conduct**. Ethical violations addressed by the Metro Board require a specified member be named, rather than the HPC as a whole. Any person may submit a complaint alleging that any one or more members have violated the standards of conduct or an executive order currently in effect, which regulates the ethical standards of conduct for employees of the metropolitan government. Standards of conduct that could be considered ethical violations may include conflict of interest, private financial gain, preferential treatment, and decision making outside of official and public channels. For more details on Metro Standards of Conduct and the executive order currently in effect listing potential violations, **click here**.

Concerns about order or conduct of a member within a meeting can be addressed during meetings utilizing a Point of Order within guidelines of **Robert's Rules of Order**. Concerns related to the conduct of the HPC presiding officer can be addressed as a "call the chair to order" or in the event of general discontent for member's decision or behavior, a confidence vote can be called. For a quick reference guide to Robert's Rules of Order, **click here**.

F. COC COMMITTEE / MEMBER



Continuum of Care (CoC) Committees are responsible for working on strategic initiatives of the CoC and making relevant recommendations to the Homelessness Planning Council (HPC). Any member of the public can attend committee meetings while official committee members are able to formally deliberate and vote on action items on the committee agenda. Official members are appointed by the HPC Chair based on recommendations from the respective committee chair/s. The HPC Chair may also create an ad hoc task force for time limited and specified reasons that also support CoC needs. See the [following link](#) for more information regarding descriptions of current committees and the process for becoming a committee member.

Differences of opinion and various perspectives are expected within committees' work. In Section IX – Part D of the CoC Governance Charter, a Code of Conduct is provided so that members understand the expectations regarding respectful deliberation during all CoC meetings at all times. This Code of Conduct is provided on all committee agenda's as follows:

All participants and attendees of public meetings, including the HPC, GM, and CoC committee meetings, are expected to abide by the following Code of Conduct:

1. Treat all participants with kindness and respect;
2. Value a variety of views and opinions;
3. Critique ideas, rather than individuals;
4. Refrain from demeaning or harassing behavior and speech;
5. Refrain from disruptive or disrespectful conduct;
6. Respect the process for meeting participation, including pre-registering to make a public comment; and
7. Disclose all potential conflicts of interest when first speaking, in alignment with Section IX Part E of the Charter.

Depending on the situation, the corrective or disciplinary action for issues may come from the Committee Chair, other Committee members or the Collaborative Applicant support staff. This may come in the form of direct and public notice of violation with opportunity to correct in real-time, as well as a separate communication detailing the violation / concern with given opportunities to correct or mitigate. Repeated or egregious offenses, or dissatisfaction with the performance or direction of committees, may be brought forth via grievance form or public comment period to the HPC for facilitation in addressing the grievance.

With regard to interpersonal emotional harm, issues should be addressed internally between affected members and chairs, if necessary. Alternative procedures as outlined in Section IV of this manual may be an appropriate avenue to resolve grievances at this level. If a member is behaving inappropriately during meetings in a way that may be considered a violation of the Code of Conduct, it is advised to follow [**Robert's Rules of Order**](#) to maintain mutual respect amongst members of the committee. For a quick reference guide to Robert's Rules of Order, [click here](#).

G. COC FUNDING ALLOCATION



The Performance Evaluation Committee (PEC) is a group that oversees the ranking of grant proposals for CoC funding. These rankings are recommended to and approved by the Homelessness Planning Council. The PEC would also monitor voluntary or involuntary reallocation procedures, which could occur due to significant findings and underperformance – [see here](#) for more details on this reallocation policy.

For grievances related to funding allocation and ranking decisions, the PEC offers an appeals process. Only CoC applicant organizations can participate in this appeals process. If an applicant objects to a decision made 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 Opportunity (NOFO). 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 Homelessness Planning Council and/or the CoC Performance Evaluation Committee;
- Allegation that CoC Homelessness Planning Council and/or the CoC Performance Evaluation Committee did not receive accurate information for proper scoring; and/or
- Violation of federal guidelines.

Please reference the following [link](#) for more information regarding grievance process with CoC Funding Allocation.

IV. Nashville-Davidson County Continuum of Care (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 may be reviewed by members of the CoC Executive Committee, the Homelessness Planning Council and/or the party I am grieving against, as applicable. I understand the CoC's commitment to anti-retaliation when sharing the above information.

Signature: _____

Date: _____