



## **GRIEVANCE AND RESOLUTION PROCEDURE**

**PURPOSE:** To provide consumers and employees with an easily accessible grievance resolution process and assure that consumer and employee concerns are addressed in a timely manner. Consumers and staff are encouraged to use this process when necessary and without fear of retaliation.

**POLICY:** Snow Belt Housing Company, Inc. (SBHCI) shall maintain written procedures for tracking, addressing and resolving consumer and employee grievances. Grievances shall be defined as written formal complaints made directly by SBHCI program consumers, employees or designated representatives. Employees can file formal grievances for any of the following reasons: workplace harassment, health and safety concerns, supervisor behavior and/or adverse changes in employment conditions. This list is not exhaustive, however, employees should try to resolve less important issues informally before they resort to a formal grievance. Although consumers and staff members may be encouraged to pursue such informal processes for resolving concerns, they will be informed of their option to file a formal grievance at any time they are dissatisfied with the result of their informal attempts.

SBHCI will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing interpreters for the deaf or assuring a barrier-free location for the proceedings.

The availability and use of this grievance procedure is in addition to, and not in lieu of, 7 CFR 3560.160 and does not prevent a person from filing a complaint of discrimination on the basis of disability with the U. S. Department of Health and Human Services, Office for Civil Rights.

### **PROCEDURE:**

#### **A. Informing consumers of the grievance and resolution procedure:**

- a. All SBHCI consumers and employees will be notified of the grievance and resolution procedure by posted notices in common, visible and accessible areas. In cases of 515 senior/disabled properties managed by SBHCI, 7 CFR 3560.160 "Tenant Grievances" will also be posted in compliance with regulations.
- b. Consumers shall be notified of the SBHCI procedure outlining the process to file a grievance and appeal through verbal means upon service initiation and in writing upon request.
- c. Employees will be notified of the SBHCI process to file a grievance upon hire. The Employee Handbook Acknowledgement form will be kept in employee's file for record retention and proof of employee review. For employees who were hired prior to the approval of the Grievance and Appeal Policy, an individual Grievance and Appeal Policy Acknowledgement form will be kept in employees file for record retention and proof of employee review.

#### **B. Filing a grievance:**

- a. Consumers, their designated representatives, or any staff member may file a formal written grievance at any time and without fear of retaliation.

- b. A grievance can be submitted by completing the “Concern Suggestion Form” or any other written means of explanation and providing it to the SBHCI employee representing program that consumer is participating in or immediate program supervisor. In the event the grievance involves the designated employee for that program, the grievance should be submitted directly to the impartial designee or Executive Director.
- c. Formal grievance responses should include the following information in order to complete a sufficient investigation: date of occurrence, name, contact information, circumstances surrounding grievance, any notes regarding informal meetings, and consumer remedy or relief sought by resolution.
- d. Formal written grievance(s) should be submitted to the Executive Director or impartial designee of Snow Belt Housing Company, Inc. for review, regardless of who the grievance is submitted to.
- e. In certain circumstances, consumers may file a grievance that has no bearing on the programs or services managed by SBHCI. In such circumstances a note will be made in the grievance summary that indicates no further action by SBHCI was necessary however a written record of the grievance will be maintained.

C. Fair Housing Notification

- a. Employees will be responsible for and held accountable to the guidelines in the Anti-Discrimination and Equal Access Policy for Snow Belt Housing Company, Inc. A signed acknowledgement form will be kept in the employees confidential file and staff will be required to take a Fair Housing training upon hire and at least one per year thereafter.
- b. Fair Housing posters with information on how to file a complaint with governing agencies will be displayed in common areas that are accessible to staff and program participants.
- c. At any time, a program recipient may report any behaviors or concerns related to discrimination directly to the Lewis County Fair Housing Officer, USDA and/or HUD without fear of retaliation.
- d. The following information will be included on formal Snow Belt “Concern Suggestion Forms” and official grievance replies:

This is an Equal Opportunity Program. Discrimination is prohibited by Federal Law.

Complaints of discrimination may be filed by contacting:

U.S. Department of Housing and Urban Development (HUD)

Mail: 26 Federal Plaza, Room 3532, New York, New York 10278-0068

Call: 800 669 9777 (TTY: 800 927 9275)

OR

USDA, Director, Office of Civil Rights

Mail: 1400 Independence Ave S.W., Washington DC 20250 9410

Call: (800) 795 3272 (TDO: 202 720 6382)

Online: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html)

Email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

D. Employee response to grievance:

- a. Any meeting conducted with the applicant to discuss the rejection must be conducted by a member of the staff who was not directly involved with the initial decision to deny.
- b. SBHCI’s Executive Director or impartial designee will conduct an unbiased review of documentation, circumstances, and staff involvement related to the consumer grievance. This investigation may be informal, but must be thorough. Employees may be subject to disciplinary action when investigation determines employee acted negligent or in violation of the code of conduct outlined in SBHCI Handbook.
- c. The Executive Director or designee will respond to consumer verbally or in writing within 15 business days of the receipt of the complaint to discuss proposed resolution; response will be documented on the Grievance Response Form and kept in a permanent file in a secure location.

E. Filing a formal appeal:

- a. If the program supervisor or impartial designee fails to respond to the consumer's grievance in a timely manner, the consumer feels the resolution is not acceptable, or if the terms of the resolution are not adhered to, then consumers can file a grievance appeal by submitting a written statement in a sealed envelope to the following address:

ATTN: Executive Committee  
Snow Belt Housing Company, Inc.  
7500 South State Street  
Lowville, New York 13367

- b. All documentation included with formal grievance appeal will be submitted to the Executive Committee without alteration, interference or delay. In the event that the grievance involves a property management concern **and** the property is not owned by SBHCI, the Executive Committee shall notify the Chairman, Executive Committee or property owner of the complaint within 15 business days.
- c. The Executive Committee will render a decision on the resolution and fairness of investigation no later than 60 business days from receipt of the appeal request submitted.
- d. In all cases, the decision of the Executive Committee shall be binding.

F. Grievance record retention:

- a. Regardless of formality, all grievances will be documented and kept in a file in accordance with record retention regulatory guidelines with the following information: Name of consumer, date of the receipt of grievance, date Executive Director or designee contacted consumer (with attempts if unsuccessful), nature of grievance, resolution, and date of resolution.
- b. Records will be kept in the Executive Director's office in a secure location, in a secure electronic folder on the SBHCI server or other locked location on the premises.

7500 SOUTH STATE STREET  
LOWVILLE, NY 13367



PH: (315) 376 -2639  
FAX: (315) 376- 2518  
NYS RELAY SERVICE NO. TTD (800) 662-1220



## CONCERN - SUGGESTIONS FORM

DATE:

NAME:

PHONE NUMBER:

ADDRESS:

NAME OF OTHERS INVOLVED (IF APPLICABLE):

COMPLAINT DETAILS/ SUGGESTIONS FOR RESOLVING COMPLAINT:

If you have reported a concern and do not feel satisfied with the resolution, you may send a written complaint to:  
Snow Belt Housing Company, Inc.  
7500 S State Street, Lowville, NY 13367  
Attn: Executive Director

*Any tenant/member or prospective tenant/member seeking occupancy in or use of Agency facilities who believes he or she is being discriminated against because of age, race, color, religion, sex, familial status, disability, or national origin may file a complaint in person with, or by mail to the U.S. Department of Agriculture's (USDA) Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW., Washington DC 20250-9410 or to the Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development (HUD), Washington, DC 20410. Complaints received by Agency employees must be directed to the National Office Civil Rights Staff through the State Civil Rights Manager/Coordinator.*

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Current tenants can either return this form by mail or placing in the secure "rent box" at each property.

SIGNATURE: