

CoC Leadership Council

Tuesday, December 12, 2023, at 1:30 p.m.



Meeting Minutes

1. Leadership Council Meeting Introduction

- Mack Haltom called the meeting to order.
- Attendance is reflected after minutes.

2. Discussion & Approval of:

- October 2023 Minutes*
 - Mack Haltom called for a motion to approve the October minutes. James Rea moved to approve. Beth Svetlic seconded the motion. Motion carried.
- 13.2023 Service Standards* - Jacob Beaumont
 - Jacob Beaumont reviewed the proposed changes to the Service Standards. Those can be found after the minutes and will take effect in January 2024.
 - Overview
 - **Revised:** Clearer definition of what a third-party advocate is, giving a client full discretion in who they choose to represent or assist them throughout an agency's internal complaint process.
 - **Added:** Member agencies must include confidentiality and anti-retaliation clauses in their internal complaint policies.
 - **Added:** Member agencies must include a commitment to maintaining a 14-day resolution time frame for client complaints in their internal complaint policies.
 - **Added:** Member agencies must include in their complaint policies language that lets their clients know they have a right to file an external/CoC complaint, and how they can do so.
 - Investigation Process
 - CoC complaints will be investigated by an independent panel made up of:
 - One member from the lead CoC agency (Housing Solutions)
 - And the following members of the AWH4T Leadership Council:
 - Chair
 - Vice Chair
 - Participant Advisory Group representative to the leadership council
 - Youth Action Board representative to the leadership council
 - **If approved, Housing Solutions staff and the SSTF will create:**
 - The digital complaint form (and supporting QR code)
 - The physical complaint form

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- Generate the supporting landing page needed to host the downloadable form, the relevant section of service standards on, as well as alternative ways to get a hold of the CoC to engage in the external complaint process
- The investigation form for use by the investigation panel for external complaints
 - Mack Haltom called for a motion to approve the updated Service Standards. James Guardiola moved to approve. Benny Naifeh seconded the motion. Motion carried.
- 14.2023 2024 Meeting Schedule* - Erin Velez
 - The proposed meeting dates for 2024 are the second Tuesday of every month from 1:30-3:00. May and November will be reserved for All-Member meetings.
 - Mack Haltom called for a motion to approve the 2024 meeting dates. Elizabeth Hall moved to approve. Claudia Brierre seconded the motion. Motion carried.
- 15.2023 Data Sharing Agreement with City of Tulsa* - Travis Hulse
 - Travis Hulse asked to renew the data sharing agreement with the City of Tulsa. This agreement shares disaggregated data from the by-name-list.
 - Mack Haltom called for a motion to approve the renewal of the data sharing agreement with the City of Tulsa. Benny Naifeh moved to approve. Elizabeth Hall seconded the motion. Motion carried.
- 16.2023 PIT Count Survey and Methodology* - Olivia Denton Koopman
 - Olivia Denton Koopman reviewed the 2024 Point-in-Time Count Survey questions and methodology. The PIT Count will take place from Jan 25-27 of 2024.
 - Updates include separating the sheltered count to be conducted within HMIS and applying the HUD FY24 HMIS Data Standard changes.
 - Other questions have been consolidated within the reasons, barriers, and services needed sections.
 - Mack Haltom called for a motion to approve the October minutes. Benny Naifeh moved to approve. Beth Svetlic seconded the motion. Motion carried.

3. Lead Agency Updates

- Member Agency Applications, Erin Velez
 - Two agencies asked the Leadership Council to become members of A Way Home for Tulsa. These included A New Leaf and Catholic Charities.
 - An online vote was conducted after the meeting.
 - A New Leaf – 15 Yes, 1 Abstain
 - Catholic Charities – 14 Yes, 2 Abstain

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- Both agencies approved as new members.
- 2024 Vice Chair - Call for Nominations, Erin Velez
 - Ginny Hensley will be stepping into the Chair position in January 2024.
 - Nominations for the 2024 Vice-Chair/2025 Chair are open.
 - Erin will send out a form to agencies for the open officer role and the open Provider Representative seat.
- Change the Way You Give Update, Erin Velez
 - The Change the Way You Give agreement has been signed by the City of Tulsa.
 - Partnership with City of Tulsa's panhandling alternative campaign
 - For AWH4T member agencies
 - Restricted for costs directly benefiting clients which are not eligible for payment by the organization's other funding sources
 - Agency may request funds every 6 months, up to \$1,000/request
 - Fund currently has a balance of ~\$8,000
 - Rhene is currently updating the policy/procedure to present at the January meeting for approval.
- Data Report, Olivia Denton Koopman
 - Data report is included after minutes.

4. Meeting Topics

- Mental Health Association Update - Mark Davis, MHA
 - Mental Health Association has partnered with Family & Children's Services to improve wrap-around services for clients that live in HUD funded units.
 - Wanted to move from maintenance to treatment, recover, and graduation to independent living.
 - Will be using the Assertive Community Treatment (ACT) model to serve clients. Instead of one case manager who works to address all of someone's needs, clients will work with a full team that all specialize in different areas. They will also have direct access to a psychiatrist.
- Low-barrier Shelter & Task Force Updates, Travis Hulse
 - Budget amendments will go to the City Council on 12/13. This includes the Emergency Rehousing Program with the Tulsa Day Center and the Priority Placement Program with the Tulsa Housing Authority. These are two items from the 9 recommendations from the 3H Task Force.

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- The Low Barrier Shelter deadline is December 20. Once those have been received, the City will evaluate the proposals and move forward from there. The CoT is now going to help acquire a facility and will be providing 3 years of funding.

5. Meeting Wrap-Up

- Public Comments
 - Two housing statements are on the Chamber's One Voice Agenda.
 - Anti-retaliation – State Level, HB2109
 - Affordable housing – Federal Level
 - Jeff Jaynes is the AWH4T representative on the City of Tulsa's HUD Committee. Please reach out to him if you have any questions/concerns with that process.
jjaynes@restorehope.org.
 - Restore Hope continues to work on rental assistance. They are nearly out of funds from the County, but they will still be helping people with other funds.
 - The annual Memorial Service will be held at the Tulsa Day Center on December 21st at 5:30 p.m. There are about 50 names on the list this year. Everyone is welcome to attend.
 - City Lights Christmas celebration will be held on December 21st under the Maybelle Bridge. Orientation begins at 6:30pm and the holiday festivities at 7pm.
- Next LC Meeting – January 9, 2024
- Meeting Adjourned

**Items voted on by Leadership Council*

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LC Attendance

| | Name | Representing | Category | Term |
|-------------------------------------|---------------------------|-----------------------------|---|--------------------|
| <input checked="" type="checkbox"/> | Mack Haltom, Chair | Tulsa Day Center | Provider Representative, Elected | 10/2021 - 01/2024 |
| <input type="checkbox"/> | Mayor Bynum | City of Tulsa | Fixed Position, Appointed | 09/2022 - 08/2024 |
| <input checked="" type="checkbox"/> | James Rea | Tulsa County | Fixed Position, Appointed | 09/2022 - 11/2024 |
| <input checked="" type="checkbox"/> | Ginny Hensley | Tulsa Housing Authority | Fixed Position, Appointed | 03/2022 - 02/2024 |
| <input checked="" type="checkbox"/> | Claudia Brierre | INCOG | Fixed Position, Appointed | 03/2022 - 02/2024 |
| <input checked="" type="checkbox"/> | Rhonda Clemons | Cherokee Nation | Tribal Representative, Appointed | 05/2023 - 04/2025 |
| <input checked="" type="checkbox"/> | Thomasene Osborn | Muscogee Creek Nation | Tribal Representative, Appointed | 05/2023 - 04/2025 |
| <input checked="" type="checkbox"/> | Sarah Grounds | City Lights Foundation | Provider Representative, Elected | 010/2023 - 09/2025 |
| <input checked="" type="checkbox"/> | Beth Svetlic | Youth Services of Tulsa | Provider Representative, Elected | 04/2023 – 3/2025 |
| <input checked="" type="checkbox"/> | Benny Naifeh | Participant Advisory Group | Consumer Representative, Elected | 12/2022-11/2023 |
| <input checked="" type="checkbox"/> | Cari Monday | Youth Advisory Board | Consumer Representative, Elected | 1/2023-12/2023 |
| <input checked="" type="checkbox"/> | Lauren Sherry | QuikTrip Corporation | Business/Commerce Representative, Invited | 04/2023 - 03/2025 |
| <input checked="" type="checkbox"/> | Elizabeth Hall | Burnstein Family Foundation | Funder Representative, Invited | 04/2023 - 03/2025 |
| <input checked="" type="checkbox"/> | Jesse Guardiola | Tulsa Area United Way | At-Large Representative, Invited | 10/2023 - 09/2025 |
| <input type="checkbox"/> | Tim Newton | Tulsa Dream Center | At-Large Representative, Invited | 04/2023 - 03/2025 |
| <input checked="" type="checkbox"/> | Stephanie Horten | JusticeLink | At-Large Representative, Invited | 10/2023 - 09/2025 |
| <input type="checkbox"/> | Richard Alexander | Tulsa Police Department | At-Large Representative, Invited | 05/2022 - 04/2024 |

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Proposed Language For 1.6.8 Grievance Procedures

1.6.8 Client Complaint Process

Overview

This section outlines:

1. The minimum requirements for internal complaint processes and procedures that A Way Home for Tulsa (AWH4T) Continuum of Care's (CoC) member agencies must meet.
2. How a participant can engage with AWH4T CoC's lead agency (Housing Solutions) to resolve complaints against member agencies that are not satisfactorily resolved by an agency's internal complaint process
3. AWH4T's process for handling complaints made by individuals against member agencies, the lead CoC agency, the Coordinated Entry System (CES), or the Homeless Management Information System (HMIS).

Scope

1. For the purposes of this policy, a "complaint" is a formal expression of dissatisfaction from a client/program participant, towards a CoC member agency.
2. Complaints may be filed regarding many issues that include, but are not limited to acts of:
 - a. Harassment;
 - b. Harm/Harmful acts;
 - c. Gross misconduct (examples: violence, sexual misconduct);
 - d. Fair Housing Act/Legal violations;
 - e. Neglect (examples: reduction or lack of access to necessary services and staff)

that are carried out by program or agency staff towards a participant.

PLEASE NOTE: This complaint process is not meant to address matters related to décor—such as wall color or carpeting—nor initial maintenance requests. These requests should be directed to the housing provider/landlord.

- f. In instances where maintenance requests have gone unanswered, a complaint may be filed.
3. A complaint may be filed by a program participant, resident, or their representative. A representative can be a case manager, family member, or other individual the participant designates as an advocate.

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- a. Any advocate doing advocacy in a non-legal capacity may disclose information for the individual who filed the complaint.
 - b. It is recommended to provide a verbal or written release of information if ongoing communication will be directed toward the representative on behalf of the client if a pre-existing one is not in place.
4. These policies cannot be used to delay removal/eviction from a program in extreme circumstances where there is the threat of harm to the health and safety of the client, staff, or another program participants/site residents. The grievance process is still available to the individual, though removal/eviction may continue.
- a. For programs that exist in scatter-site locations, if a lease lists a specific action that results in an immediate eviction - that's a legal issue that service providers might not be able to do anything about but they can and should meet with the client to walk them through their options.

Internal Complaint Policy and Procedure Requirements

All AWH4T partner agencies must have an internal written policy and procedure to address complaints.

Complaint procedures are focused on preventing the escalation of conflicts, resolving conflicts, and improving overall program environments for both clients and staff. To this end, programs must maximize the use of informal avenues for resolving disputes whenever possible.

The following outlines the minimum requirements for an agency's internal complaint policy and procedures:

1. Where appropriate, internal agency policy and procedures must be posted at program sites in plain view of participants, at a minimum in English and Spanish. In instances where a program is embedded in scatter-site housing, or other mixed program/non-program housing, this is not required.
2. Agencies must provide an explanation of the complaint process to participants upon program admission, upon receipt of any notice of need for corrective action, and upon receiving a warning of discharge notice—verbally and in written form in a language that they understand and is accessible to individuals with hearing or visual impairments. Written and verbal explanations of the complaint policy must be made available upon request to program participants.
 - a. **Additional Consideration:** Admission into a program involves a great deal of paperwork, and often a significant adjustment period. To that end, it is strongly recommended that agency/program staff have a dedicated meeting three weeks after a client has been admitted into a program to review the agency and CoC complaint policies with the client, where no other policies or paperwork will need to be reviewed and/or signed.

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3. Internal complaint policy and procedures, and verbal and written explanations, must:
 - a. Specifically inform participants of their right to file a complaint via the agency's internal complaint process.
 - b. Provide participants with clear procedures to file a complaint using the agency's internal complaint process.
 - c. Clearly explain the participant's right to be represented by a third-party representative, including their case manager, family member, or other individual they wish to designate as an advocate.
 - d. Include a policy regarding the confidentiality of the complaint, noting that information regarding the complaint will only be shared with the participant and necessary staff in its resolution.
 - e. Include an anti-retaliation policy explaining that the participant will not receive punitive treatment as a result of filing a complaint.
 - f. Provide a timeline for resolution of internal complaints that does not exceed 14 days. In instances where client health, safety, or housing access is at risk, it is expected that this timeline will be accelerated to preserve client wellbeing.
 - g. Explicitly inform participants of their rights to engage in the external complaint process outlined later in this document if the client feels the agency's internal process did not adequately resolve their complaint.
4. Recordkeeping
 - a. Agencies must keep a record of all complaint forms and documentation relevant to individual complaints for a period no shorter than five (5) years.
5. Accessibility
 - a. Agencies must make every reasonable effort to ensure the internal and external complaint processes are accessible to their clients. This includes making accommodations for language and disability access.
 - b. Paper copies of the external CoC complaint form must be made available to clients upon resolution of the agency's internal complaint process, and on the request of the client.

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- c. Agencies needing assistance in meeting the above, or other, accessibility requirements can contact Housing Solutions for recommendations.

CoC Complaint Policy

If, after completing the internal complaint process for an agency, the individual filing the complaint would like additional review on the matter, they may file a complaint with the AWH4T CoC as outlined below:

1. *Filing of complaint*

- a. **How:** To file a complaint, the individual or their representative will need to complete and submit the A Way Home for Tulsa CoC Complaint form.
 - i. *Electronic:* The complaint form can be accessed at [web address for form TBD], via phone [QR code for phone].
 - ii. *Paper:* The complaint form can be printed off, filled out by hand, and can be submitted electronically to complaints@housingsolutionstulsa.org, or by mail to:

Housing Solutions
P.O. Box 4628
Tulsa, OK 74159

Please Note: Written complaints *not* submitted on the official form *will* be accepted. We ask that you include the best mode of contact so a CoC Lead Agency member can follow up with you to gather further information to start the complaint process.

- iii. *Telephonic:* If an individual needs assistance completing the complaint form, they may call Housing Solutions at (918)-322-9922. Housing Solutions staff or their representative will complete the form by telephone on the individual's behalf.
- iv. *No Wrong Door:* The above are just the most common ways to convey a desire to engage in the complaint process. There is no wrong way to start the complaint process so long as a member of the lead CoC agency can readily contact the person making the complaint.
- v. All complaints will be shared with a select team of reviewers tasked with investigating complaints (more information below), and any entities deemed necessary in the investigation and resolution processes.

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- b. **Transparency:** To ensure transparency and equity, all external CoC complaints will go to the designated members of A Way Home for Tulsa's investigation panel (see next section for panel members list).
 - i. *Electronic:* Complaints filed via the online form or QR code will be automatically forwarded to the parties listed above upon submission.
 - ii. *Paper:* Paper forms submitted via e-mail to complaints@housingsolutionstulsa.org will be automatically forwarded to the parties listed above upon receipt of email. Paper forms submitted by mail directly will be scanned in electronically and distributed to these entities within two (2) business days of receipt.
 - iii. Confirmation of receipt will be provided to the client and/or their representative via their preferred contact method as indicated on the complaint form.

2. *Investigation of complaints*

- a. **Investigation Panel:** Complaints filed using the external CoC complaint procedure will be investigated by an investigation panel convened by A Way Home for Tulsa. Members of this panel will include one designee from the lead CoC agency (Housing Solutions), as well as the following members of the A Way Home for Tulsa Leadership Council:
 - i. Chair
 - ii. Vice Chair
 - iii. Participant Advisory Group designee
 - iv. Youth Action Board designee
 - 1. **Conflict of Interest:** In instances where an AWH4T member that would normally be involved in the investigation or resolution process is a representative of, or is otherwise meaningfully involved with, the agency a complaint is filed against, they will recuse themselves. A replacement will be identified by the remaining stakeholders.
- b. **Timeline for Acknowledgement:** The investigators will acknowledge receipt of a complaint within three (3) business days of submission and start the investigation no later than five (5) business days after submission.
 - i. In instances where the investigators identify that the complaint is related to a health or safety issue (e.g., violence against a client, pest infestation), or the imminent loss of housing, the investigator will acknowledge receipt and begin

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the investigation within two (2) business days.

- ii. In the above timeframe, the investigators will notify the following individuals of the receipt of a complaint and the beginning of the investigation process:
 - 1. The client that has filed the complaint and/or their representative;
 - 2. The AWH4T representative of the agency the complaint has been filed against.

- c. **Investigation Process:** Investigations will entail document review, interviews, and meetings. This may include but is not limited to review of internal complaint documents submitted to the partner agency by the participant, interviews and/or meetings with program staff, the participant and/or their representatives, and other parties deemed relevant to the investigation by the investigator.
 - i. Participants and their representatives are asked to make every effort to engage with the investigators during their investigation. The investigators will make every reasonable accommodation to ensure full participation of the participant and/or their representative.
 - 1. If during the investigation, the individual who filed the complaint is unresponsive to outreach for more than 10 business days, the complaint will be considered closed.
 - 2. The investigators will make at least four (4) attempts to contact the individual using their preferred form of contact as indicated on the complaint form.
 - 3. At any time, the individual who filed the complaint can re-engage the investigators and re-open a complaint that was closed mid-way through the investigation process.
 - ii. CoC member programs are expected to cooperate with all reasonable requests for documentation and participation from the investigators.

- d. **Resolution:** The investigators will review the collected information and issue the recommendation(s) for resolving the complaint within 30 business days of submission.
 - i. Complaints regarding health and safety, or where loss of housing is imminent, will be prioritized and may be resolved on a faster timeline
 - ii. Resolutions may include, but are not limited to recommendations for:

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1. Direct resolution between the agency and the participant;
 2. Participant re-assessment or re-prioritization for housing services;
 3. Development of a corrective plan between the agency and A Way Home for Tulsa;
 4. Adjustments to internal agency policies.
- iii. Before the recommended resolution(s) finalization, the investigators will review the recommendations with the program participant and/or their representative for approval.

3. Confidentiality

- a. All AWH4T Leadership Council members and other CoC stakeholders involved in the filing and resolution of complaints will keep participant and program information learned through the complaint proceedings confidential.

4. Recordkeeping and Accountability

- a. The lead CoC agency will keep complaint records on file for a minimum of two (2) years.
- b. The lead CoC agency will track and report on complaint trends to the A Way Home for Tulsa Leadership Council annually to inform system improvement opportunities. Complaint trends may include:
 - i. Complaint types;
 - ii. Complaints pending resolution;
 - iii. Corrective actions plans between the CoC and partner agencies;
 - iv. Needs for system-wide trainings or activities.
- c. The lead CoC agency or their representative will follow up with program participants who have completed the complaint process to ensure satisfactory resolution. This will occur twice in the 30 days following the issuance of recommendations.

Accommodations

Individuals needing accommodations or other assistance with the complaint process should contact Housing Solutions at (918)-322-9922 or at complaints@housingsolutionstulsa.org.

Anti-retaliation Policy

A Way Home for Tulsa is dedicated to providing program participants with the opportunity to file complaints without fear of retaliation from the party accused or their representatives.

Retaliation includes, but is not limited to:

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- Harassment
- Intimidation
- Program dismissal
- Reduction in or refusal to provide services
- Violence

Complaint Process Overview

| 1 | 2 | 3 | 4 |
|---|---|--|---|
| Complete Internal Agency Process | Submit CoC Complaint | Investigation | Resolution |
| Program participant or representative completes the internal complaint process for the agency they are complaining against. | Program participant or representative submits CoC complaint via electronic or written form. | AWH4T Investigation Panel initiates the investigation process. | Investigators will present proposed resolution(s) to the participant and for approval. Upon approval, recommended resolution(s) are issued to the agency the complaint was filed against. |