

BEST OF TIMES AND WORST OF TIMES:

POLICY BEST PRACTICES FOR PROGRAM
AGREEMENTS, GRIEVANCES, AND TERMINATION

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PROGRAM AGREEMENTS



**REQUIRED FOR
ALL HOUSING
PROGRAMS**



**MUST BE SIGNED
AND INCLUDED
IN EACH CLIENT
FILE**



**CLIENT SHOULD
UNDERSTAND
THE PROGRAM
RULES AND
POLICIES
BEFORE
RECEIVING
ASSISTANCE**



**CAN LOOK
DIFFERENT FOR
EACH
ORGANIZATION
AND PROGRAM**

WHY DO I NEED A PROGRAM AGREEMENT?

Setting Expectations

If everyone is informed of their responsibility at intake, there is less room for confusion when conflicts arise.

Program Compliance

If a program participant is not in compliance with the program, the signed agreement can be reviewed during case management.

Next Steps

When considering termination, your agency has a signed document that can show the participant was aware of the program rules and guidelines at intake.

KEEP IN MIND

- The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated **only** in the most severe cases.
- VAWA protections prohibit denial or termination of assistance **solely** because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking.

TERMINATION AND GRIEVANCE POLICY



Can be included in the Program Agreement



Must be reviewed with client BEFORE they receive assistance



Must be signed and kept in each client file for every program



Can be unique to the organization

Must include

- Written notice to the program participant containing a clear statement of the reasons for termination
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision
- Prompt written notice of the final decision to the program participant

SHELTER SPECIFICS

Shelters may have more specific rules and regulations that are program specific.

Clients staying at the shelter on site must abide by shelter rules and expectations, or they may face termination.

- **Post shelter rules in public spaces so they can be seen by all clients and referenced at anytime.**
- **Also post termination and grievance policies so that clients can have access.**



TERMINATION VS EVICTION

Termination and Eviction are NOT the same

- Termination from the program ends assistance to the client
- Eviction is a legal action taken by an owner for the removal of a tenant from housing due to a lease violation, which could include nonpayment of rent.

When a program participant is to be evicted from a unit, the recipient or subrecipient may continue to serve the program participant in another unit.





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THINKING ABOUT TERMINATING?

- All other options must be considered
- Troubleshoot with your team and consult your leadership
- Consider changes you can make to build a better relationship
- Reach out to IHCDa grants team



TIPS FOR TERMINATION

1

Follow your
organization's
Termination
Policy

2

Document
everything in
case notes

3

If you feel it
necessary,
notify the
IHCDA grants
team

4

If client files a
grievance,
follow your
grievance
policy

Permanent Supportive Housing Termination and Grievance Policy

██████████ respects the rights of clients to make a complaint about the service they receive, or the decisions made about their services. The termination and grievance policies are provided to participants at program entry and participant signs receipt of the policies.

To ensure fairness in decision making, staff involved in the initial concern/incident will not be involved in the grievance/appeal decision making process.

The following procedures will be followed:

Termination

Participants will be provided 30-days' notice of release from the program, this may be due to there being no more identified financial need or if the participant has violated program requirements. Termination does not bar the subrecipient from providing further assistance at a later date to the same individual or family.

Reasons for termination may include, but is not limited to, the following:

- Participant has consistently failed to meet at least monthly to address barriers to long-term housing stability
- Participant has been aggressive, abusive, or threatening to ████████ staff
- Participant has not provided requested evidence of income as required by the program
- Participant has provided false or misleading information
- Participant is no longer residing at the unit for which rental assistance is being provided, or has sublet the property/unit
- Participant has violated their lease or landlord/tenant agreement
- Participant has been non-compliant with the financial portion of the rental assistance, which can result in a direct violation of their lease
- Participant has reached the maximum number of months of assistance

In the event a participant violates the program requirements, or no longer meets the program eligibility guidelines, ████████ has the right to stop providing assistance to the participant. In terminating assistance to a participant, ████████ will take the following steps:

- 1) ████████ will attempt to provide verbal notice to the participant by telephone or meeting
- 2) ████████ written notice to the participant containing a clear statement of the reasons for termination
- 3) Provide opportunity to file a grievance (see below policy)
- 4) Provide written notice of final decision

Grievance Procedure:

1. Participants should provide a written summary of their grievance/concerns to [REDACTED] ESG Rapid Rehousing and Homeless Prevention within five (5) days of an incident. A concern/grievance form will be provided.
2. The Director will review the received concern, conduct any necessary follow-up with agency staff and meet with the program participant to discuss the issue in person no later than five (5) business days from receipt of the concern.
3. The Director will provide a written decision to the program participant(s) and all involved parties no later than ten (10) business days from the receipt of the concern.
4. If the program participant is dissatisfied with the decision of the Director, they have the option to submit the written grievance form to the Board of Directors within five (5) business days of the Director's written decision.
5. [REDACTED] Board of Directors will review the grievance/concern at the next scheduled board meeting.
6. The representative of the Board of Directors will provide the participant with a **final, written decision** no later than five (5) business days after the board meeting.
7. The concern/grievance form and outcome of the grievance should be documented in the program participant's file.

DISCUSSION TIME



- ✓ What termination prevention strategies have worked for you?
- ✓ What changes have you made to your agreements and policies?
- ✓ How do you collaborate with landlords to prevent eviction?
- ✓ If you have terminated, was the client surprised it was happening?

WHAT IF?

A client that has been terminated could make a complaint to IHCDA if they are unhappy with the results of their filed grievance.

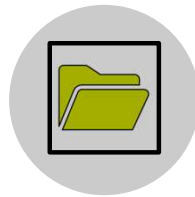
What happens next?

- ✓ Did you follow your own termination and grievance policy?
- ✓ Did you document every step of the process?
- ✓ Did you violate the rights of the client?
- ✓ Can you provide this evidence to IHCDA if an investigation occurs?

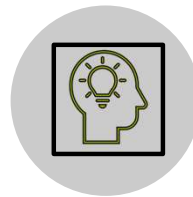
FINAL TIPS AND KEY TAKE AWAYS



REVIEW AND UPDATE
CURRENT POLICIES AND
PROCEDURES
**ARE THEY CLEAR? ARE THEY
FAIR?**



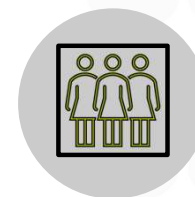
AUDIT YOUR CLIENT FILES
DOES EVERY CLIENT HAVE A
SIGNED PROGRAM
AGREEMENT WITH A
TERMINATION AND
GRIEVANCE SECTION?



REVIEW INTERVENTION AND
TERMINATION PREVENTION
STRATEGIES WITH YOUR TEAM
**IS THERE ROOM FOR
IMPROVEMENT?**



COMMUNICATE WITH IHCDA
IS THIS A CONSISTENT ISSUE?
DO YOU NEED GUIDANCE?



KEEP YOUR STAFF AND OTHERS
SAFE
**IS TERMINATION NECESSARY
TO ENSURE SAFETY?**

THANK YOU

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