



POLICY AND PROCEDURE NOTICE: PPPN-054 GRIEVANCE POLICY AND PROCEDURES

Summary and Purpose of PPN: To establish and codify a system of conflict/dispute resolution related to the Ryan White CARE Act Part A delivery system and for appealing decisions of the recipient.

Please note: these procedures govern the procedures for filing a grievance against a subrecipient (agencies funded by the Fulton County Ryan White Part A Program) regarding client services. Grievance against the recipient and the recipient's processes (e.g., RFP Process, vendor selection process, etc.) are governed by **FCRW RPPN-020 Recipient Grievance Policies and Procedures**. Grievances against the Metropolitan Atlanta HIV Health Services Planning Council are governed by Article XI. Grievance Procedures of the Metropolitan Atlanta HIV Health Services Planning Council By-Laws and in accordance with the process set forth in the Planning Council's Standard Operating Procedures.

Authority:

- HRSA Part A Manual
- Fulton County Ryan White Part A Contract/Agreement

Purpose

The purpose of this grievance process is to establish and codify a system of conflict resolution/dispute resolution that will give clients (and potential clients) and subrecipients an equitable mechanism for resolving complaints and grievances within the Ryan White CARE Act Part A delivery system.

These processes do not cover violations or perceived violations of Title VI, HIPAA, the Americans with Disabilities Act or other relevant federal regulations which should be aggrieved through the guidelines and in the manner set forth by the regulations.

Policy and Procedure:

Each Part A subrecipient shall have a grievance process by which client complaints against the agency with respect to Ryan White funded services might be addressed.

1. Each Part A subrecipient shall develop and implement a grievance process by which client complaints against the agency with respect to Ryan White funded services might be addressed.
 - A. The subrecipient's grievance procedures must include reference to **RPPN-021 Recipient Grievance Policy and Procedures: Client v Part A Subrecipient** which govern the process for a client/potential client to follow after exhausting all options under the subrecipient's grievance procedures. **RPPN-021 Recipient Grievance Policy and Procedures: Client v Part A Subrecipient** is available at: www.ryanwhiteatl.org
 - B. A copy of the subrecipient's grievance procedures must be submitted to the Part A Program Office with the first Expenditure Report.
2. Clients must be made aware of the availability of the subrecipient's grievance procedures.
 - A. Upon admission to services, every client is provided (at no cost) a copy of the agency grievance procedure, which is explained to the client in an understandable language and format.
 - B. The agency must document in the client record that client received agency procedures by means of a statement signed or initialed by the client indicating that these have been provided and explained. This statement may be included on the agency's consent for services form or a separate form.
3. Any individual who is potentially eligible for Ryan White Part A services who has been denied enrollment in the subrecipient's Part A funded programs must be provided, at no cost, with a copy of the subrecipient's grievance procedures.
 - A. The agency must document in the client record that client received agency procedures by means of a statement signed or initialed by the client indicating that these have been provided and explained. This statement may be included on the agency's consent for services form or a separate form.
4. The subrecipient will not terminate, suspend, reduce or alter any service provided to a client filing a complaint or considering filing with the agency or the Fulton County Ryan White Part A Program Office, unless the client actions put the agency, staff, or other clients at risk.

Documented supervisory review is required when a client is terminated or suspended from services due to behavioral issues. It is expected that the agency will

follow its own policies and procedures should a client need to be expelled from agency premises.

5. The subrecipient will not intimidate, threaten or decrease service offerings in any way to a client filing a complaint or considering filing a complaint.
6. The subrecipient will maintain a file of all complaints received and their corresponding resolutions. The subrecipient must document the complaint/grievance on a standardized form available in a language and format understandable to the client. The resolution of each grievance/complaint is also documented on the standardized form and a copy given to the client
7. Subrecipients must include, with each monthly expenditure report, a summary of any complaint filed under this process as well as current status of, and final disposition of, any such complaint.

Verification:

- Review of subrecipient policies and procedures.
- Review of client files.
- Review of expenditure reports.

Approved: May 2016

Reviewed: January 2021