



## Saint Louis MHB External Grievance Procedure

### Definitions

**MHB-Funded Organization** – An MHB-Funded Organization is any entity currently receiving grant funding through one or more Saint Louis MHB grants.

**Participant or Service Recipient** – A participant or service recipient is any individual who is, has, or is attempting to receive services or support from an MHB-Funded Organization.

**Participant or Service Recipient Grievance** – A Participant or Service Recipient Grievance is a grievance brought by a participant or service recipient, or on behalf of a participant or service recipient, related to an MHB-Funded Organization's failure to act in accordance with MHB's state statutes, federal grant guidelines, contract, or Community Investment Policies, or arising out of conduct that adversely affects an individual participant or service recipient's rights, welfare, or status. The grievance procedure is applicable only to discrete issues and should not be used as a forum for initiating policy changes at the Saint Louis MHB.

**Grievance** – A Grievance is defined as any dispute between an individual or organization and an MHB-Funded Organization, arising out of the MHB-Funded Organization's failure to act in accordance with the MHB's state statutes, federal grant guidelines, contract, or Community Investment Policies, or arising out of conduct that adversely affects an individual Participant or Service Recipient's rights, welfare, or status. The grievance procedure is applicable only to discrete issues and should not be used as a forum for initiating policy changes at the Saint Louis MHB.

**Non-MHB Funded Organizational Grievance** – A grievance against an organization that is not an MHB-Funded Organization.

**Non-Participant/Non-Service Recipient Grievance** – A Non-Participant/Non-Service Recipient Grievance is a grievance brought by any individual or entity arising out of an MHB-Funded Organization's conduct, which does not relate to the participant or service recipient's rights, welfare, or status.

This grievance procedure shall not apply to:

- Grievances not involving an MHB-Funded Organization
- Grievances related to an MHB-Funded Organization's compliance with the terms of its contract with Saint Louis MHB or other contractual obligations, unless the grievance is filed by or on behalf of a participant/service recipient

- Grievances filed by an employee or volunteer of an MHB-Funded Organization regarding the organization's actions or inactions related to the employee or volunteer
- Any issue that has been previously decided in another proceeding, including a proceeding filed and resolved grievance or an issue that has been decided through legal processes
- Any Grievance that is pending before a court of law

MHB is committed to providing a transparent process to address problems as they arise in MHB-Funded Organizations. All Participants/Service Recipients 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 MHB encourages resolution of problems through internal processes. All MHB-Funded Organizations are expected 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 organizations, MHB has established this policy to govern how grievances may be brought to MHB.

1. MHB will post this policy on MHB's website, along with a fillable Grievance form and information about how to submit Grievances through other methods.
2. All MHB-Funded Organizations must have an internal grievance policy in place that:
  - a. Provides for an initial response to all grievances within two working days,
  - b. Explicitly ensures that no retaliation or loss of services will result from filing a grievance, and
  - c. Notifies Participants/Service Recipients of their right to file a Grievance with the MHB. They must also have Grievance forms available for Participant/Service Recipient use.
3. All MHB-Funded Organizations must post Civil Right Enforcement Agency (CREA) and/or Equal Housing Opportunity Commission (EHOC) notices in locations where Participants/Service Recipients are likely to see them.

## **External Grievance Procedure**

1. Any person wishing to file a Grievance with MHB may do so by:
  - a. Filling out the fillable Grievance form at the following website: [www.stlmhb.org](http://www.stlmhb.org)
  - b. Obtaining a Grievance form from an MHB-Funded Organization and delivering it to the MHB Executive Director in-person, via mail, or via e-mail; or
  - c. Calling the MHB Executive Director. Unless it would be futile to do so, individuals must first attempt to resolve the Grievance internally with the MHB-Funded Organization against whom the Grievance is filed, as soon as possible after the event in question occurred.
    - i. Any MHB Trustee or staff member who is approached by someone wishing to file a Grievance should provide them with a Grievance form and refer them to MHB's Executive Director, as appropriate.

2. The MHB Executive Director or Deputy Director will contact the individual filing a Grievance within two (2) working days to acknowledge receipt of the Grievance and to document the basic facts. The MHB Executive Director or their designee will determine if the Grievance is appropriate to be resolved through MHB's External Grievance Process. If it is not, the MHB Executive Director or Deputy Director will assist in making a proper referral.
3. If the MHB Executive Director or Deputy Director determines that the Grievance is properly brought to Saint Louis MHB, the Executive Director or Deputy Director will gather relevant information from the individual filing the Grievance and the MHB-Funded Organization. Based on the facts and any supporting documentation, the MHB Executive Director or Deputy Director will take steps to resolve the Grievance, including but not limited to resolving the Grievance immediately; interviewing further people; arranging a meeting of the MHB Executive Director or Deputy Director, the person filing the Grievance, and the Organization against which the grievance was filed to attempt to reach a mutually agreeable resolution. If no mutually agreeable resolution is possible, the MHB Executive Director or Deputy Director will call a special meeting of the MHB Program Committee to determine a proper resolution to the Grievance. Matters may be resolved within the Program Committee or may require referral or reporting to the MHB Board of Trustees, or another outside party. At all times, the MHB Executive Director or Deputy Director will keep the individual filing the Grievance aware of the progress of the Grievance.
4. The MHB Executive Director or Deputy Director will inform the individual filing the Grievance of the resolution of the Grievance and will involve the individual in the resolution to the extent this is possible and appropriate. The MHB Executive Director or Deputy Director will advise the person filing the Grievance of their right to be free from retaliation and should advise them to report any retaliation they encounter.
5. If the individual filing the Grievance is not satisfied with the outcome of the Grievance, they may appeal to the MHB Board of Trustees by informing the Chair of the Program Committee, or the Chair of the Board. The MHB Board Chair or their designee shall contact the individual filing the appeal within five (5) working days of being notified of the appeal to acknowledge receipt and to document basic facts. The MHB Board Chair will determine the best course for resolving the appeal, including but not limited to forming a small ad hoc committee of Trustees to assist with processing the appeal. The appeal shall be made a part of the next Board of Trustees' meeting agenda and shall remain on the agenda until the appeal is resolved. The Board shall ensure that the appeal is timely resolved, and that the individual appealing the grievance is informed of the Board's findings and resolution.

## **Reporting External Grievances**

The MHB Executive Director or Deputy Director will provide the following information to the Program Committee and the Board of Trustees on an annual basis:

1. Number of Grievances received in that fiscal year;
2. MHB-Funded Organization(s) against whom the Grievances were filed;
3. General nature of the Grievance(s); and
4. Resolution of the Grievance(s).

The MHB Executive Director or Deputy Director will share only general, non-identifiable trends regarding grievances with the MHB Board of Trustees, except in the instance when a Grievance is appealed to the Board of Trustees. Board discussions regarding a Grievance should be held in a closed, executive session.

## *Training*

The MHB Executive Director or Deputy Director will propose further trainings or policies/procedures to address problems identified through Grievance process.



**What was the resolution of the grievance? Please provide written documentation if you have it.**

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ADDRESS: \_\_\_\_\_

TELEPHONE NUMBER: \_\_\_\_\_ E-MAIL: \_\_\_\_\_

COMPLAINANT'S REPRESENTATIVE, if any: \_\_\_\_\_

Submit to: [stlmhb@stlmhb.org](mailto:stlmhb@stlmhb.org) using the subject line "Grievance"