

Document Type:¹

☒ Policy & Procedure ☐ Process Guideline
☐ Plan ☐ System Description

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Document Scope: (applies to Policy & Procedure only)

- The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
- The requirements herein apply, verbatim, to GCBH BH-ASO and its subcontractors¹
- ☒ The requirements herein apply both to GCBH BH-ASO and its subcontractors¹. Additionally, subcontractors must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which subcontractors are responsible.

PURPOSE: To outline the grievance process specific to the Community Behavioral Health Rental Assistance (CBRA) Program consistent with the Department of Commerce's CBRA guidelines.

DEFINITIONS:

- I. Community Behavioral Health Rental Assistance (CBRA): Program to provide a rental subsidy for high-risk individuals with behavioral health conditions.
- II. Lead Grantee: Greater Columbia Behavioral Health, LLC (GCBH BH-ASO), contracted with the Department of Commerce for the provision of the CBRA program.
- III. Subgrantee: An organization with which GCBH BH-ASO is subcontracted with for the provision of the CBRA program.
- IV. Service Recipients: Individuals or families receiving services from lead or subgrantees.
- V. Grievance: An expression of dissatisfaction with the services or a decision made regarding the CBRA program or any CBRA staff members conduct. This includes, but is not limited to, the quality of care or services received, aspects of interpersonal relationships such as rudeness of a subgrantee's employee, or failure to respect the service recipients' rights regardless of whether remedial action is taken.

POLICY

- A. Ensure GCBH BH-ASO and its subgrantees are following the CBRA guidelines related to the grievance procedure for households seeking or receiving subsidies from the CBRA program.

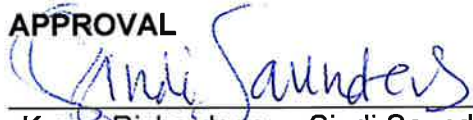
PROCEDURE

1. GCBH BH-ASO's Community Behavioral Health Programs Administrator will ensure that all subgrantees have a written grievance procedure that will include the program participant's right to review decisions and present concerns to program staff not involved in the grievance. The procedure shall clearly describe how a household can request a review and report concerns, as well as be accessible to all service recipients seeking or receiving subsidies.

2. Individuals filing a complaint shall be provided with access to translation and accessibility accommodation as needed. The entity that the complaint is filed with shall be responsible for ensuring access to translation and accessibility accommodation as appropriate.
3. Complaints may be filed anonymously, and at any point may be escalated to the lead grantee and/or to the Department of Commerce.
4. Service recipients submit complaints directly to the service provider (usually the subgrantee) following their established complaint procedure. If the complaint is not resolved to their satisfaction through the subgrantee it shall be escalated to the Lead grantee within two (2) business days of unsuccessful resolution.
 - 4.1. If still unresolved, or if the service recipient is afraid of repercussions due to lead and/or subgrantee retaliation, the complaint shall be escalated to the Department of Commerce in one of the following ways:
 - 4.1.1. Completion of the online complaint submission form found at <https://forms.office.com/g/qi63JqFCbr>
 - 4.1.2. Emailing the CBRA Program Manager at CBRAADMIN@commerce.wa.gov
 - 4.1.3. Emailing the HD Quality Assurance Manager at HDComplaints@commerce.wa.gov
 - 4.2. Lead Grantees are responsible for addressing all complaints about their services or supports and/or unresolved complaints about services or supports provided by subgrantees. If a complaint involves but has not been addressed by a subgrantee, the Lead Grantee forwards the complaint to the subgrantee via their complaint process to first be addressed at the lowest level. If a complaint involving a subgrantee is not resolved at the subgrantee level, it is addressed at the Lead Grantee level. If a complaint is not resolved at the Lead Grantee level, the Lead Grantee will assist, where appropriate and necessary, in escalating the complaint to the Department of Commerce. All complaints not resolved to the satisfaction of the complainant are considered unresolved.
5. Lead Grantees and subgrantees must maintain complaint logs which may be reviewed during monitoring or upon request by the Department of Commerce.
6. GCBH BH-ASO prohibits any form of retaliation via fines, fees, or other strictly enforced terms.
7. If a complaint is filed with a subgrantee, subgrantee(s) shall notify GCBH BH-ASO within two (2) business days in writing to Sindi Saunders, Corporate Compliance Officer at SindiS@gcbh.org. The written notification should include:
 - 7.1. The reason for the grievance;
 - 7.2. Steps taken to resolve the grievance;
 - 7.3. If the household is satisfied with the resolution.
8. GCBH BH-ASO shall acknowledge receipt of each grievance, submitted by either a subgrantee or directly from a service recipient, either orally or in writing within two (2) business days. If unresolved, GCBH BH-ASO shall attempt to resolve the reported grievance within 14 days of the original receipt. Unresolved grievances shall follow the timelines and escalation procedure described above.

9. This policy and the policies of the subgrantees shall be accessible to all employees working with CBRA funds, posted at the facilities, available on the agencies' website, and included or referenced in the recipients materials, including client handbooks or signatory paperwork, verbalized to the awardees during intake, and available to the public upon request.

APPROVAL



Karen Richardson or Sindi Saunders, Co-Directors



Date