State of Nevada

Department of Business & Industry
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PROGRAM NOTICE

EMERGENCY SOLUTIONS GRANT PROGRAM

Client Termination and Grievance Policies (Version 1.0)

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HUD requires Grantees to develop formal Termination and Grievance Policies and to instruct agencies providing Emergency Solutions Grant (ESG) Program funds to do the same. Agency Termination and Grievance Policies will be reviewed as part of the Division's ESG monitoring site visit.

The following is the Division's policies regarding both termination of ESG assistance and the process for clients to pursue challenges to an agency's decision to deny ESG assistance as reflected in the ESG Policies and Procedures manual. *ESG sub-recipients must adopt a similar policy that shall be provided to members of the public if requesting assistance with ESG funds, regardless of whether or not the applicant is accepted into the ESG program*:

Termination Policy: Sub-recipients may terminate assistance to a program participant who violates program requirements. Sub-recipients may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-recipient must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. The process, at a minimum, should consist of:

- 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; and
- Prompt written notice of the final decision to the program participant.

Sub-recipients must also make every effort to ensure that clients discharged from ESG assistance, either due to termination due to violation of program requirements or because a program participant has reached the maximum number of

months that they are eligible for assistance, are not discharged into the streets or into an unstable housing situation.

Grievance Policy: Each sub-recipient is required to establish a formal process, in writing and available to potential clients, that includes necessary steps needed to challenge an agency's decision to deny ESG assistance. The procedure should contact information at the local agency, Division if funds were allocated from the State, and the HUD contact in San Francisco.

Denial of assistance may include, but is not limited to, the individual or household's ineligibility for the program or failure to provide verifiable evidence of eligibility, etc. Sub-recipients must have a procedure that governs applicant denial and grievance processes. These procedures should describe the program requirements and how an applicant did not qualify or was denied. The grievance procedure could be the same as a program participant terminated. This would include, for example, allowing applicants to request a hearing regarding the termination of their denial. The termination, denial, and grievance procedures should be readily available to participants either in written information or by posting the in a public place. It is critical to the nature of ESG and transparency to effectively communicate these procedures to program participants and ensure that the procedures are fully understood.

Staff members of the Division and its sub-recipient service providers, including employees, volunteers, affiliates, contractors and associates, are required to comply with this grievance policy. Each staff member must receive and acknowledge received of a copy of this notice. The original copy shall be maintained in the sub-recipients ESG Program File.

Received and acknowledged by:

_____
Signature

_____   _____
Printed Name/Title   Date