

Client Grievance Policy and Procedures

SUMMARY

Background: The Ryan White HIV/AIDS Program (RWHAP) includes the Part A, Minority AIDS Initiative (MAI), and Ending the HIV Epidemic (EHE) programs. These programs require that medical and support services are provided without discrimination and regardless of a person's ability to pay or their current or past health condition.

Miami-Dade County's Office of Management and Budget (OMB) manages these programs and works to make sure people with HIV who qualify for the program (called *clients*) receive needed medical care and support services.

This policy explains how clients can raise concerns or complaints about their services. It sets clear, fair steps for resolving problems and ensures that all complaints are handled in an open and respectful way.

Purpose: The purpose of this policy is to provide clients with a process to report complaints or grievances about Ryan White Program services. It ensures that all concerns are handled quickly, fairly, and consistently, and encourages service providers to take preventive steps to reduce future complaints.

SCOPE

This policy applies to all clients who receive services paid for by the Miami-Dade County Ryan White Program (Part A, MAI, and EHE). It also applies to their authorized representatives and any organizations or individuals involved in providing or overseeing these services.

LEGISLATIVE BASIS

Under Section 2602(c)(2) of the Ryan White Treatment Modernization Act, Part A grantees (also called Recipients) must have clear grievance procedures that follow the guidance of the U.S. Health Resources and Services Administration (HRSA). This requirement ensures that all client complaints or grievances are handled fairly and consistently across all funded programs.

DEFINITIONS

See Appendix A for definitions of important terms used in this policy, including words such as Client, Complaint, Contracted Service Provider, Subrecipient, Recipient, and Grievance. These definitions are intended to follow applicable federal guidance, including HRSA/HAB National Monitoring Standards, as well as the local Ryan White Program policies and procedures.

WHO MAY FILE A GRIEVANCE

Any client receiving Ryan White Part A, MAI, or EHE services in Miami-Dade County who believes they have had a problem with a service or interaction with a Contracted Service Provider (Subrecipient) has the right to file a grievance.

ELIGIBLE GRIEVANCES

Any problem, complaint, or dispute between a client and a Subrecipient related to Ryan White Part A, MAI, or EHE-funded services can be addressed through this policy.

Examples include, but are not limited to:

- Client being told they are **not eligible** for the program
- **Denial** of medical or support services
- **Poor quality** of care or services
- **Dissatisfaction** with how services are provided

(See Appendix C for additional details)

PROCEDURES

Step 1:

Communication and Distribution of Client Grievance Policy and Procedures

- Each Subrecipient must have a grievance policy and procedures for clients that follow the same requirements in this Miami-Dade County Ryan White Program policy. If a Subrecipient already has an internal grievance policy that includes all the same required provisions, that policy may be used to fulfill this requirement.
- Clients must receive a copy of the Miami-Dade County Ryan White Program Client Grievance Policy and Procedures when they first register for services (during intake or enrollment).
 - Clients can also access this policy on the County's Ryan White Program website: <https://www.miamidade.gov/global/management/ryan-white-program.page>
 - See Attachment 1: Client Grievance Policy and Procedures Acknowledgment Receipt Form.
- Each service site must clearly display information on how clients can make a complaint or file a grievance. Posting the County-approved "Know Your Grievance Rights" flyer is sufficient to meet this requirement. (See Attachment 6.)
- Questions about this policy should be directed to the appropriate Subrecipient representative or to County (Recipient) staff as soon as possible - preferably within two (2) business days. (See the "Contact Information" section for details).

Step 2:

Initial Report of Informal Complaint or Formal Grievance (Submission to Subrecipient):

Clients are encouraged to first try to resolve any concerns directly with the Subrecipient - either informally or formally, depending on the situation. (See Attachment 2: How to Resolve a Concern or File a Grievance)

- Subrecipients must document and track all informal complaints and formal grievances they receive. At a minimum, documentation must include:
 - The client's **Computer Identification System (CIS) number**
 - The **type** of issue (informal complaint or formal grievance)
 - The **date** of the incident
 - A **detailed description** of what happened
 - The **status or outcome** (for example: not started, pending, resolved to client's satisfaction, referred to County grievance process, etc.)
 - The **incident closure date**, when applicable
- Subrecipients must acknowledge receipt of the grievance with three (3) business days. Grievance must be addressed in a timely manner, not to exceed thirty (30) calendar days.
- Subrecipients must notify the Miami-Dade County Ryan White Program Administrator about any formal grievance related to Ryan White Program services.
 - WHEN to Notify:
 - If the grievance involves a client being found **ineligible or denied services**, it must be reported **immediately**.
 - **All other** grievances must be reported **within three (3) business days**.
 - HOW to Notify:
 - Send the notification to the Ryan White Program Administrator by encrypted email or through the Secure Message feature in the program's data management system, Provide® Enterprise Miami.
 - See Contact Information section of this policy for details.
 - WHAT to Include:
 - Client's CIS#, date of birth, incident date, and a short description of the issue.
 - **Do not include any client identifying information (such as name or address) in the message.**

Step 3:

Formal Grievance Process (Submission to Recipient):

- **Submission of Grievance:** If a client's concern or grievance reported to the Subrecipient is not resolved to their satisfaction, the client may file a formal grievance with the County (Recipient).

- A **Miami-Dade County Ryan White Program (Part A, MAI, EHE) Client Grievance Form** (see Attachment 3) must be completed and submitted to the Ryan White Program Administrator **within ten (10) business days** of the decision or issue in question.
- **Receipt and Acknowledgment:** The Ryan White Program Administrator will confirm receipt in writing and provide the client with a summary of the grievance review process and expected timeline, **within two (2) business days** of receiving the grievance.
- **Investigation and Resolution:** The Ryan White Program Administrator or designee will review and investigate the grievance.
 - A written response outlining the findings and any recommended resolution will be provided to the client **within thirty (30) calendar days** of receiving the grievance.

Step 4 (if needed):

Appeals Process

- **If Dissatisfied:** If the client is not satisfied with the decision made by the County (Recipient), they may file a **written appeal** within **ten (10) business days** of receiving the decision.
 - The appeal must clearly explain why the client disagrees with the decision and includes any supporting documents.
 - See Attachment 4 for the Miami-Dade County Ryan White Program (Part A, MAI, EHE) Client Grievance Appeal Form.
- **Final Decision:** An independent review panel will examine the appeal and issue a final written decision **within ten (10) business days** after receiving it.

Step 5 (if needed):

Escalation to assigned HRSA Project Officer

- If the client has completed all the steps in this process and still feels their grievance has not been resolved, the County (Recipient) can give the client the contact information to take their concern to the program's funder - the U.S. Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA), HIV/AIDS Bureau (HAB).
 - The Recipient will also notify the HRSA Project Officer assigned to Miami-Dade County about the escalation.
- When a grievance is escalated to HRSA, the Subrecipient involved will be informed.

REPORTING AND DOCUMENTATION

All complaints, grievances, decisions, and appeals must be documented and handled respectfully and professionally, in accordance with all applicable laws, regulations, and program standards.

The total number and status of all Ryan White Program-related complaints and grievances must also be reported to the County (Recipient) as part of the Annual Progress Report, during monitoring site visits, or upon request from authorized Recipient staff.

Each Subrecipient must keep a centralized log and file (see sample, Attachment 5) for all client complaints and grievances related to Ryan White Program (Part A, MAI, and EHE) services.

Log Requirements:

The log must list each complaint or grievance in order by date and include:

- The **date** the complaint or grievance was filed
- **Identify** if the incident is related to a **complaint (C)** or a **grievance (G)**
- The **client's name**
- The **client's Computer Identification System (CIS) number**
- A **summary** of the issue or concern
 - Clearly note if the issue involved a **"refusal of services"**
- The **status or outcome** (for example: open, pending, resolved, or referred to the County)
- The **closure date**, if applicable

Complaint or Grievance File Requirements:

For each complaint or grievance, the Subrecipient must keep a separate file that includes:

- A note clearly stating if the issue involved a **"refusal of services"**
- All **original documents**, such as:
 - Completed complaint or grievance forms
 - Letters, emails, or notes from the client
 - Agency response letters, memos, or documentation showing how the issue was handled and resolved

PROSPECTIVE IMPLEMENTATION OF DECISIONS OR SETTLEMENTS

Any decision or settlement that is reached may require future (prospective) changes, but it does not require reversing past decisions.

For example, if a settlement results in updates to a Subrecipient's internal procedures, the Subrecipient must apply those changes going forward but does not need to reopen or change any previous decisions.

DISPUTE PREVENTION AND EARLY RESOLUTION

The Miami-Dade County Ryan White Program (Part A, MAI, and EHE) understands that the best way to handle grievances is to prevent them whenever possible.

Each Subrecipient is responsible for finding and addressing potential issues early, following internal procedures. Recipient staff are available to offer guidance or help when needed to prevent these issues from becoming formal grievances.

Subrecipients are expected to inform appropriate staff on all relevant Ryan White Program's Policies and Procedures, including but not limited to this *Client Grievance Policy and Procedures*. Staff must understand these policies, know how to follow them in daily work, and be able to explain them to clients. Training should be provided at hire, annually, and whenever policies are updated.

CONTACT INFORMATION

For questions about this *Client Grievance Policy and Procedures*, or to bring an unresolved formal grievance to the attention of Miami-Dade County Ryan White Program, please contact:

Miami-Dade County Office of Management and Budget
Grants Coordination / Ryan White Program
111 NW 1st Street, 22nd Floor
Miami, FL 33128
305-375-4742
RyanWhiteProgram@miamidade.gov

IMPORTANT: Subrecipients and clients should **never** include any personal protected health information (PHI) in email subject lines, email body content, or voicemail messages.

REVIEW AND UPDATES

This policy will be **reviewed every year** to ensure it continues to meet all **federal requirements** and remains effective in resolving client grievances.

Updates will be made as needed to:

- Clarify procedures
- Reflect changes in laws, regulations, or program operations
- Incorporate new best practices that improve fairness and efficiency in handling grievances

APPENDICES

- **Appendix A:** Definitions
- **Appendix B:** Contract and Monitoring Site Visit Language Related to Client Grievances
- **Appendix C:** Excerpts from the *Miami-Dade County Ryan White Program Service Delivery Manual*, including Service Definitions, *Client Rights and Responsibilities*, and *Involuntary Disenrollment of Clients*

ATTACHMENTS

- **Attachment 1:** Client Grievance Policy and Procedures Acknowledgment of Receipt Form
- **Attachment 2:** How to Resolve a Concern or File a Grievance (flowchart)
- **Attachment 3a:** Client Grievance Form (English)
- **Attachment 3b:** Client Grievance Form (Spanish) – [Translation Pending]
- **Attachment 3c:** Client Grievance Form (Haitian Creole) – [Translation Pending]
- **Attachment 4a:** Client Grievance Appeal Form (English)
- **Attachment 4b:** Client Grievance Appeal Form (Spanish) – [Translation Pending]
- **Attachment 4c:** Client Grievance Appeal Form (Haitian Creole) – [Translation Pending]
- **Attachment 5:** Sample Agency Complaint and Grievance Log
- **Attachment 6:** Know Your Grievance Rights (fillable flyer for posting)

REFERENCES

1. **Miami-Dade County Policies and Procedures**
2. **Miami-Dade County Office of Management and Budget – Grants Coordination/Ryan White Program (OMB) Professional Services Agreement**, most current
3. **U.S. Department of Health and Human Services (HHS), Health Resources and Services Administration, HIV/AIDS Bureau (HRSA/HAB) National Monitoring Standards**, most current
4. **Ryan White HIV/AIDS Treatment Extension Act of 2009** (Public Law 111-87), as codified at Title XXVI of the Public Health Service Act (Chapter 6A)
5. **2 CFR Parts 200 and 300:** Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (federal OMB Uniform Guidance), most current
6. **HHS Grants Policy Statement**, Version 2.0, October 1, 2025, as may be amended
7. **Miami-Dade County OMB Ryan White Program Comprehensive Monitoring Instrument**, most current

RESPONSIBLE OFFICE (Department/Division/Unit)

Office of Management and Budget/Grants Coordination/Ryan White Program