



Alabama Rural Coalition for the Homeless (ARCH)

Alabama Balance of State Continuum of Care (AL-507)

FY 2026 Applicant Rights and Grievance Policy

Policy Approval Date: November 6, 2025 • Effective Date: November 6, 2025

Approved By: ARCH Board of Directors

Purpose

The Alabama Rural Coalition for the Homeless (ARCH), as the Collaborative Applicant for the Alabama Balance of State Continuum of Care (AL-507), is committed to administering the Continuum of Care (CoC) Program Local Competition in a fair, transparent, consistent, and impartial manner. This Applicant Rights and Grievance Policy establishes the process by which applicants may raise concerns regarding the administration of the local competition when they believe the published Local Competition Policies and Procedures were not followed or were applied inconsistently.

The purpose of this policy is to:

- Ensure all applicants receive equal treatment and a reasonable opportunity to participate in the local competition.
- Promote accountability, transparency, and consistency throughout the review, scoring, ranking, and selection process.
- Provide applicants with a structured process to request review of alleged procedural errors, mathematical or scoring calculation errors, undisclosed conflicts of interest, or other administrative errors that may have materially affected the administration of the competition.
- Resolve grievances in a timely, fair, objective, and impartial manner while maintaining the integrity of the Continuum of Care competition.

This policy supplements the ARCH Local Competition Policies and Procedures and does not alter HUD regulations, the Continuum of Care Notice of Funding Opportunity (NOFO), or any applicable federal requirements.

Applicant Rights

Applicants have the right to:

- Be treated fairly and consistently throughout the local competition.
- Be evaluated using the published scoring criteria and competition procedures.
- Receive written notification of the local competition outcome.
- Submit a written grievance regarding the administration of the local competition in accordance with this policy.
- Receive a timely written response to a properly submitted grievance.

Grounds for a Grievance

A grievance may be submitted only for one or more of the following:

- Failure to follow the published Local Competition Policies and Procedures.
- Mathematical or scoring calculation errors.
- Procedural errors that may have materially affected the administration of the competition.
- Undisclosed conflicts of interest.
- Reliance on inaccurate factual information during the review process.
- Other documented administrative errors that materially affected the applicant's evaluation.

Matters Not Subject to Grievance

The following are not grounds for a grievance:

- Disagreement with reviewer opinions or professional judgment.
- HUD regulations, funding priorities, or NOFO requirements.
- Ranking decisions based upon the published scoring methodology.
- Requests to submit new or revised application materials after the published deadline.
- Requests to submit a new project, Expansion project, replacement application, or materially modify an application after the published deadline.

- Changes resulting from an applicant's interpretation of HUD guidance issued after the local competition closes, unless ARCH determines such changes are required for all similarly situated applicants.
- HUD funding decisions.

A grievance shall not be used as a mechanism to revise, supplement, or materially modify an application after the published local competition deadline.

Filing a Grievance

Grievances must:

- Be submitted using the ARCH Applicant Rights and Grievance Form.
- Be submitted within three (3) business days after ARCH issues written notification of the applicant's local competition outcome.
- Clearly identify the policy or procedure being challenged.
- Describe the facts supporting the grievance.
- Include any supporting documentation.
- Identify the requested resolution.

Completed grievances shall be submitted electronically to the Executive Director of ARCH.

Review Process

ARCH will review each grievance to determine whether it was timely submitted and meets the requirements of this policy.

When appropriate, grievances will be reviewed by individuals who did not participate in scoring or ranking the application.

Corrective action, if warranted, will be limited to addressing verified procedural or administrative errors. A grievance shall not be used to reopen the competition or permit submission of a new or materially revised application after the published deadline.

Final Determination

ARCH will provide a written determination whenever practicable within five (5) business days after receipt of a complete grievance.

The determination shall constitute the final decision of the ARCH local grievance process.

Nothing in this policy limits any rights provided under applicable HUD regulations.

Effect on the Competition

The filing of a grievance shall not delay or suspend the local competition timeline, the work of the Ranking and Review Committee, Board approval of the Priority Listing, or submission of the CoC Consolidated Application to HUD unless corrective action is determined to be necessary.

Records Retention

ARCH will maintain all grievance records in accordance with applicable federal record retention requirements and ARCH policies.