



RESOLUTION NHA-4215-2012

**RESOLUTION OF THE BOARD OF COMMISSIONERS
OF THE NAVAJO HOUSING AUTHORITY**

**Approving the Navajo Housing Authority
Customer Complaint Policy and Procedure**

WHEREAS:

1. Pursuant to 6 N.N.C., Sections 605 and 616 (b) (14) the Board of Commissioners of the Navajo Housing Authority (“NHA”) is empowered with the authority to manage the affairs of the NHA including the power to establish and amend rules, regulations and policies in the operation and management of its programs; and

2. The Navajo Housing Authority (“NHA”) periodically receives complaints from its customers and members of the public regarding various concerns relating to the NHA, its services, and at times its employees; and

3. The members of the public also communicate their concerns and frustrations to members of the NHA Board of Commissioners; and

4. At times, some of the complaints and concerns are not acknowledged or addressed by the NHA for a variety of reasons; and

5. The NHA needs a policy and procedure that provides guidance to NHA employees and staff on how to address complaints and concerns as well as provide specific timelines on when there should be a response to the complaints or concerns raised; and

6. Attached hereto and made a part hereof as Exhibit “A” is the policy and procedure that addresses the receiving and processing of complaints by the NHA; and

7. The NHA Senior Management has reviewed and provided input to the development of the policy document and recommends that the NHA Board of Commissioners adopt the same.

NOW, THEREFORE, BE IT RESOLVED THAT:

A. The Board of Commissioners of the Navajo Housing Authority hereby approves the adoption of the Navajo Housing Authority Customer Complaint Policy and Procedure as shown in Exhibit “A” and made a part of this resolution.

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B. The Board of Commissioners of the Navajo Housing Authority hereby directs the Chief Executive Officer to immediately implement the Navajo Housing Authority Customer Complaint Policy and Procedure.

CERTIFICATION

Commissioner Shawnevan Dale, moves that the foregoing Resolution **NHA-4215-2012** be adopted and this was seconded by Commissioner Leila Help-Tulley.

Same was passed by the following vote:

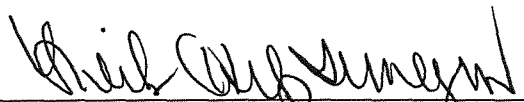
AYES: 5 NAYS: 0 ABSTAINED: 0

The Secretary, thereupon, declared said motion carried and said Resolution **NHA-4215-2012** was adopted this **12th** day of **January**, 2012.

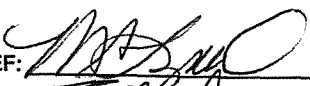

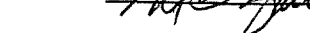


Edward T. Begay, Chairperson
NHA BOARD OF COMMISSIONERS

ATTEST:



Leila Help-Tulley, Secretary/Treasurer
NHA BOARD OF COMMISSIONERS

RESPECTIVE CHIEF: 
LEGAL REVIEW: 
CHIEF EXECUTIVE OFFICER: 

Navajo Housing Authority

Customer Complaint Policy and Procedure

I. PURPOSE:

A. The purpose of the policy is to:

1. Clarify how the public may make a complaint or an appeal
2. Define the standards the public can expect when they make a complaint
3. Recognize the importance of complaints in providing feedback about Navajo Housing Authority (NHA) services and performance
4. Set out how NHA will monitor complaints, and use that information to improve services and identify training needs

II. POLICY STATEMENTS

A. NHA's Customer Complaint Policy is based upon 4 key principles:

1. It will be responsive: NHA will offer those who complain a clear response to their complaint. Responses will be provided within clearly defined timescales and in a sensitive and sympathetic manner.
2. It will seek to improve service delivery: It will give us a second chance to achieve tenant and customer satisfaction prevent recurrence and thus help shape future improvements in service delivery.
3. It will be easy to access and be well publicized: NHA will accept complaints from tenants, or customers, or from those appointed to represent the complainant; either in person, by telephone, by letter or via the internet. NHA's Customer Complaint Policy will be made available on tape, in large print, or other formats, and, where required, in community languages. Assistance will be provided to service users with particular needs who wish to make a complaint; this may include the use of interpretation services where English is not the complainant's first language.
4. It will be well managed: Our complaints handling will aim to be objective and to resolve problems as soon as possible in a manner which respects confidentiality and privacy.

III. DEFINITION

A. For the purpose of this policy and procedure, a complaint is:

1. "an expression of dissatisfaction, by one or more members of the public, about the NHA's action or lack of action or about the standard of a service, whether the

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action was taken or the service provided by the NHA itself or by a person or body acting on behalf of the NHA (i.e., any NHA Division, Department, Program, subrecipient, or a member of its workforce).

2. Complaints under this policy may include:
 - A. Delays by NHA in delivering services;
 - B. Failure to follow NHA-approved policies and procedures;
 - C. Inadequate or unsatisfactory services by NHA;
 - D. Rudeness and inappropriate or offensive behavior
 - E. Unfair treatment and/or discrimination by NHA; or
 - F. Delays in or failure by NHA to make decisions which give rise to a statutory right of appeal.

3. The foregoing definition does not include complaints or appeals against, or objections to, decisions of NHA or the actions of any person or body acting on behalf of NHA, the subject-matter of which, would be generally governed by or pursued by way of any applicable law or any existing NHA-approved policies or procedures applicable to such type of complaint and/or appeals, including but not limited to employee/personnel grievances, "whistleblower" complaints, or NHA Code of Ethics violations. In these cases, a complainant can expect to be advised on how to pursue such complaint and/or appeal and about any deadlines and/or timelines that may apply.

IV. RECEIPT OF COMPLAINTS

- A. Complaints under this policy can be received from:
 1. any person or organization receiving, or seeking to receive, services from NHA or from any NHA subrecipient, subgrantee or contractor and subcontractor;
 2. with such foregoing person's consent, any organization, next of kin or other person acting on their behalf; or
 3. a member of the NHA Board of Commissioners.

- B. Complaints can be made in person, by phone, by email, on audiotape, in writing, in Braille and in languages other than English.

V. MINIMUM STANDARDS FOR HANDLING COMPLAINTS

- A. All Divisions, Departments, Programs and subrecipient staff and contractors shall meet the following minimum standards in dealing with complaints:
 1. Each complaint will be date-stamped and recorded upon receipt into NHA automated complaint tracking system;

2. Each complaint will be acknowledged within three (3) working days of receipt in an appropriate medium and language;
 3. Response standards will be set and customers will be told what they can expect to happen and when;
 4. Customers will be kept informed of progress in dealing with their complaints, and if it cannot be resolved within the agreed timescales; and,
 5. Where there is more than one stage in the process for dealing with a complaint, customers will be told at the end of each stage how they may pursue their complaint further.
- B. The outcome of each complaint will be monitored. Information obtained will be communicated to the relevant service provider and included in periodic complaints reports to the NHA management team and the NHA Board of Commissioners.
- C. Each complaint will have a designated complaints administrator with responsibility for ensuring that complaints are logged, tracking progress at each stage, and recording outcomes. For contract compliance complaints, the Grants Management Department will be responsible for monitoring its subrecipients' compliance with the NHA compliance and monitoring policy for subrecipients of NAHASDA funded programs.
- D. The NHA Executive Office Complaints Manager shall act as the NHA "ombudsman" under this policy and shall be responsible for:
1. Dealing with ombudsman cases arising under this policy
 2. Taking over conduct of stage 2 investigations where a NHA department has delayed in dealing with a complaint (for which an internal charge may be made by NHA) or it is not appropriate for the investigation to be carried out within the NHA department
 3. Developing procedures and guidance for handling complaints
 4. Developing and monitoring use of a NHA complaints database
 5. Giving guidance on the investigation of individual complaints, and ensuring cross-departmental complaints investigations are being coordinated by one of the NHA departments involved.
- E. Guidance notes and training on best practice in complaints handling will be offered to all staff involved in dealing with complaints. Complaints handling will be included as a core module in the customer services training program provided by NHA.

VI. COMPLAINTS REPORT

- F. The NHA management and the Board of Commissioners will receive an annual report from the Executive Office Complaints Manager on complaints activity in the previous year. The report may:

1. Identify improvements to service delivery introduced in response to complaints;
 2. Recommend action to minimize or avoid similar complaints in the future;
 3. Recommend procedural improvements for handling and resolving complaints;
 4. Identify training and information needs; and,
 5. Invite staff to make relevant recommendations to the Executive Office Complaints Manager or other NHA committees.
- A. The NHA Management Team will receive a quarterly statistical report on the number of complaints received, outcomes achieved, and trends which can be identified.

VII. PROCEDURE:

- A. The purpose of this procedure is to ensure that:
1. As many complaints as possible are resolved at the initial point of contact without the need for the customer to pursue the matter further
 2. Any faults are acknowledged and an apology is offered
 3. The customer is given a clear and relevant explanation whenever such explanation is requested
 4. Acknowledged deficiencies in NHA's services are identified and remedied as quickly as possible
 5. Effective action is taken to avoid similar complaints in future
 6. Best practice in dealing with complaints is shared across NHA
- B. Operation of the procedure:
1. Informal Resolution of Complaint
 - a. In most cases, service delivery problems reported by customers are resolved satisfactorily by the member of NHA staff they contact first, without any need for further action. If the customer is not satisfied with the response given at this informal stage, they are entitled to ask for their complaint to be dealt with formally under the NHA Customer Complaint Policy and Procedure. All formal complaints will be recorded under the procedure outlined in this policy, and that information is regularly analyzed to identify patterns of complaints and possible service improvements.
 2. The NHA Customer Complaint Procedure has three formal stages:

NOTE: At each formal stage, correspondence will be acknowledged in writing within three (3) working days of receipt.

Stage 1

Complaints can be made in writing or orally to the manager of the NHA section/program/department responsible for the service. If a customer has difficulties in making a written complaint at any stage of the procedure, they can request assistance or submit their complaint in an alternative form.

The customer will get a written response from the NHA section/program/department manager within 10 working days of receipt of the complaint. The response will tell them that they can ask for an investigation at stage 2 of the procedure if they are not satisfied with the response.

Stage 2

A request for a stage 2 review should be made in writing to the designated complaints officer (DCO) of the NHA Division concerned and should include an explanation of the customer's reasons for dissatisfaction with the Stage 1 response. If relevant reasons are given a review of the stage 1 investigation and response will be carried out under the supervision of the Division Director and re-investigated, if appropriate. The aim of the review is to ensure that all matters raised in the original complaint have been comprehensively and accurately addressed and, if not, to ensure that this now happens. The Division Director will then make a recommendation and reply to the complainant, or if he disagrees with it, instruct the section/program/department director to review the investigation or to make further inquiries .

The Stage 2 review will be completed within 10 working days of receipt of the Stage 2 complaint. In exceptional circumstances, the review may take longer than 10 working days. If so, the customer will be informed by the 7th day of the reason for the delay and given a target date for a final response. The final response will tell the customer how to complain further to the Executive complaints manager.

Stage 3

A request for a stage 3 review should be made in writing to the designated Executive Office Complaints Manager, and should include an explanation of the customer's reasons for dissatisfaction with the Stages 1 & 2 response. If relevant reasons are given a review of the stages 1 & 2 investigation and response will be carried out by the Executive Office Complaints Manager, and re-investigated if appropriate. The aim of the review is to ensure that all matters raised in the original complaint have

been comprehensively and accurately addressed and, if not, to ensure that this now happens. The Executive Office Complaints Manager will then make a recommendation and reply to the complainant, or if he/she disagrees with it, instruct the NHA Division Director to review the investigation or to make further inquiries.

The Stage 3 review will be completed within 10 working days of receipt of the Stage 2 complaint. In exceptional circumstances, the review may take longer than 10 working days. If so, the customer will be informed by the 7th day of the reason for the delay and given a target date for a final response.

1. NHA Board of Commissioner Inquiries
 - a. NHA Board of Commission (BOC) members may make inquiries to the NHA about a range of matters raised with them by constituents. The general purpose of these inquiries is to obtain information in order to respond to the constituent.
 - b. If the constituent wishes to make a complaint about the delivery of a service, the BOC Member can refer the matter to be dealt with under the NHA Customer Complaints Procedure. This will avoid the BOC Member acting as an intermediary and enables a board member to represent their constituent if they feel this is appropriate. If the matter is not within the scope of this policy and there is a statutory or other appeal process available, the BOC Member will be advised promptly to ensure that the constituent does not miss the opportunity of exercising a statutory right by using an inappropriate complaint channel.
 - c. There are two routes used by a BOC Member to make inquiries:
 - i. direct the inquiry to the NHA section/department/program supervisor who deals with the subject of the complaint; or
 - ii. to the relevant designated complaint administrator (DCA)The DCA will ensure the BOC Member and/or their constituent receives a full response from NHA within the response period provided below.
 - d. The NHA aims to respond to BOC Members' inquiries within 10 working days of receipt, whichever route is used. Where the matter is urgent, the response time will be reduced, as appropriate. If the inquiry concerns a complaint about an NHA service that has not been referred previously to the NHA complaints procedure, it may take longer to provide a full response.

VIII. AMENDMENT

- A. This policy may be amended from time to time by the NHA Board of Commissioners upon recommendation of management.

Adopted January 12, 2012
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