



POLICY MEMO

DATE: March 17, 2026
TO: CCSD Employees, Contractors
FROM: CCSD Policy Unit
SUBJECT: Contractor Grievances

This Policy Memorandum provides clarifying guidance regarding grievances in CCSD programs administered by contractors and subcontractors. Programs subject to this guidance include Community Services Block Grant (CSBG), State Eviction Prevention Funds (SEPF), Neighbors Helping Neighbors (NHN), and Short-Term Crisis Services (STCS).

While there is some variation in CCSD program policy, the following standards generally apply and shall be observed when interpreting CCSD policy, the terms and conditions of any applicable contract, and other guidance related to contractor grievances. For the purposes of this Policy Memorandum, a 'Client' refers to an applicant for or recipient of CCSD program benefits and services.

Contractor Grievance Standards

Contractors administering CCSD programs shall create program grievance policies and procedures to resolve client disputes at the local level.

Clients shall first follow the contractor's grievance process for grievance resolution.

If the client's grievance is not resolved in full, the client may request administrative review of the contractor's decision by CCSD.

Administrative review is a process whereby CCSD determines if the contractor's final action or benefits decision was appropriate.

An administrative review determination by CCSD is based upon an examination of the following factors:

- Whether the contractor accurately and properly applied CCSD program policy to the adverse action or benefits decision;
- The contractor's compliance with the terms of any applicable contract; and
- If the contractor's established grievance procedures were followed prior to escalation to CCSD.

Administrative review is available only after the client has exhausted the local grievance process.

If the action/decision was made by a subcontractor, the subcontractor's grievance process must be exhausted before elevating to the contractor.

Contractor-administered program grievances are not subject to appeal beyond CCSD administrative review, with the following exception:

- Short-Term Crisis Services decisions may be subject to DES administrative review and appeal under [A.R.S. 46-241.03](#).

CCSD may issue corrective action to a contractor based upon administrative review findings, in accordance with all applicable contractual requirements.

Contractor Grievance Procedures

Contractors administering CCSD programs shall submit program grievance policies and procedures to CCSD for review and approval. Subcontractors shall submit grievance policies and procedures through the DES-contracted agency.

Contractor grievance policies and procedures shall inform clients of the following:

- The client's right to file a grievance for any adverse action or benefits decision made by the contractor regarding a CCSD program;
- The specific procedures for filing a grievance;
- The duties and responsibilities of the contractor in processing a grievance; and
- The client's right to request administrative review of the contractor's decision by CCSD when the grievance is not resolved in full.

Contractors and subcontractors shall provide grievance policies and procedures to clients or members of the public:

- At the time of application;
- With any program decision notice;
- On any website available to the public about the program; and
- Upon request, such as via email or physical copy.

A client must be provided no fewer than 10 calendar days to file a grievance with the local agency.

A client shall submit a request for CCSD administrative review in writing within 10 calendar days from the date of the final adverse action or benefits decision following exhaustion of the local grievance process.

CCSD shall conduct an administrative review of escalated grievances and issue a decision letter in writing within 30 calendar days of receipt of the request. The decision will, in whole or in part, uphold the prior decision or return the decision back to the contractor for re-determination.

CCSD may contact the contractor or the client directly to request additional information necessary to complete the administrative review.

References

[Arizona Revised Statutes, Title 46 - Welfare](#)

[CCSD Grievances Policy](#)

Community Action IGA Scope of Work, *Sections (5) and (19)*