Exhibit 9

MASH's own grievance policy and procedure, as held in BSAS's files

Source

DPH public records production, request BSAS-2025-35, first production, pages 2 to 7.

Redactions

Redactions made by the producing agency are preserved as produced. In addition to those, the Vanderburgh Foundation has redacted email addresses and telephone numbers. Our redactions are solid black boxes. Nothing else has been altered; pages appear in their original order.

Massachusetts Alliance for Sober Housing

Grievance Policy

It is the policy of Massachusetts Alliance for Sober Housing (MASH) to ensure MASH certified sober homes and stakeholder grievances are handled respectfully, appropriately, and professionally. The formal grievance procedure includes, but is not limited to, the investigation, determination of the grievance, and recommendation of the Ethics Committee regarding the standing of MASH certified sober homes. Based on the nature of the grievance, the Ethics Committee may make recommendations to suspend or discontinue a sober home certification to the MASH Board of Directors who will make the final decision. Grievances reported to MASH must be submitted through the MASH website (Grievance Policy tab) by submitting a grievance form.

Please note:

- **MASH processes grievances for MASH certified sober homes only.**
- **The formal grievance procedure shall not be used for retribution or personal gain.**
- **All grievance submissions and reports are kept confidential and not available to the public. The identity of the complainant will not be disclosed to the sober home. In some circumstances, investigating the grievance itself may identify the complainant.**
- **Grievance investigations are limited to the elements of certification. MASH does not investigate grievances that may require legal enforcement.**
- **If your grievance requires further action by an outside agency, MASH will close the grievance, inform the complainant of the decision, and may forward the information to a local, state, federal, or judicial authority.**

If you have a question about any of this information, please do not hesitate to contact us.

Grievance Procedure

Please note: It is important to follow the grievance procedure carefully and to document all pertinent facts, dates and information when filing a grievance.

Step 1: Filing
A formal grievance should be filed within 30 days of when the complainant became aware of or suspected violation of the MASH Code of Ethics or MASH Standards. The complainant is required to file a grievance online through the MASH website. Under special circumstances where a complainant is unable to file a grievance on the website, a MASH staff member may assist.

Step 2: Submission
Upon submission, the completed MASH formal grievance form will be directed to the Recovery Homes Collaborative's designee (investigator) for prompt processing.

Step 3: Notification of Receipt
Upon receipt of a grievance, the investigator from Recovery Homes Collaborative (RHC) shall notify the respondent and complainant by email or telephone within 3 business days of the receipt of the grievance. The investigator will also forward a copy of the grievance to the MASH Executive Director and the MASH Ethics Committee upon receipt.

Step 4: Investigation
Within 14 days of receipt of the written grievance, the investigator will complete an investigation and report the findings in writing to the MASH Executive Director (ED) and the Ethics Committee. The investigation may include telephone or in-person interviews with the parties and witnesses, site visits to the sober home and review of written

records. Site visits may be unannounced. An extension of no more than 14 days may be granted for an investigation that takes longer than the initial 14-day time frame.

Step 5: Ethics Committee Review

The ED and the Ethics Committee Chair will review the report from RHC and determine if additional information from the parties involved is needed. During the Ethics Committee monthly meeting, the Committee will consider and discuss the RHC report and any supporting documentation and determine whether or not the grievance is substantiated. If the grievance is deemed substantiated by the Ethics Committee, the Committee will make recommendations for corrective action. When considering recommendations for corrective actions, the Ethics Committee will consider the concept of progressive discipline.

Within 30 days of receipt of the findings of the investigator, the Ethics Committee will record its findings and decision. An extension of no more than 30 days may be granted for assessments that take longer than the initial 30-day timeframe. No member of the Ethics Committee shall intentionally try to stall, prolong, or delay proceedings. The Ethics Committee may render its decision solely on the basis of the grievance and the investigator's report or may request the complainant or respondent to appear separately in front of the Ethics Committee to gather additional information. A complainant or respondent does not have the right to demand to appear in person before the Ethics Committee.

Step 6: Presentation to the Board

If the Ethics Committee determines that a house should be recommended for suspension, decertification, or denial of an operator's certification, they must present verbal and written documentation to the MASH Board of Directors for their determination. The presentation shall include the original grievance, the RHC investigation report, additional information as a direct result of the grievance, and the recommendation or action recommended.

Step 7: Board Decision / Recommendation (in the case of a recommendation of suspension, decertification, or denial)

The MASH Board of Directors will discuss and vote on the suspension, decertification, or denial of MASH certification. A report of the findings, voting results and corrective actions to be taken will be provided to the respondent via certified letter within 14 business days after the MASH Board Meeting. The proceedings will be recorded in the meeting minutes as an official record. If an operator wishes to appeal to the Board's decision, they will be given the opportunity to meet with the Board Directors at the next meeting. The operator must inform the MASH ED that they would like to appeal against the decision prior to the next meeting.

Approved 1/30/24

MASH POLICY 18-01
Grievance Procedure

Purpose: This policy is intended to provide guidance on the procedures for investigating and adjudicating grievances filed against MASH members, and to provide clarity for both the grievant and the operator.

Process:

I. The grievant is required to file a grievance online through the MASH website. Under special circumstances where a grievant is unable to physically file a grievance, a MASH staff member may assist;
II. Upon receipt of a grievance, the investigator from the Recovery Homes Collaborative (RHC) shall notify the MASH Executive Director (ED) and the MASH Ethics Committee Chair via email;
III. The Ethics Committee chair shall assign a committee member to reach out to the operator and discuss the grievance;
IV. Simultaneously, the RHC investigator will conduct an investigation on the grievance;
V. Upon completion, the RHC investigator will issue a report to the ED and the Ethics Committee;
VI. At its monthly meeting, the Ethics Committee will consider and discuss the report, and make recommendations for corrective action;
VII. If the corrective action includes suspension or revocation of the certification, the ED will prepare a report for consideration by the Board of Directors (BOD). The report will be shared with the operator who will have ample notice and opportunity to be heard at the next BOD meeting;
VIII. In considering recommendations for corrective actions, the Ethics Committee will consider the concept of progressive discipline;
IX. The Board of Directors will consider reports for discipline at its monthly meeting and will make a determination on each case. The ED will then issue a written report to the operator and also make it available to the grievant; and
X. Notice of the conclusion of the grievance will be provided to the Ethics Committee.

[redacted]
- [redacted]
- 1-Call [redacted] or Fax [redacted]

» Grievance Policy

Home [redacted] / Grievance Policy

It is the Massachusetts Alliance for Sober Housing's (MASH) policy to ensure MASH-certified sober homes and stakeholder grievances are handled respectfully, appropriately, and professionally. If you would like to file a grievance, please carefully read the following information about MASH's formal grievance procedure. **Also, please note all grievances are CONFIDENTIAL and your identity will not be disclosed to the sober home.** If you have a question about any of this information, please do not hesitate to contact us [redacted] Please note: MASH manages grievances only for MASH-certified sober homes. To learn more about the certification process and why you should certify your sober home, click here [redacted]

• The formal grievance procedure includes, but is not limited to, the investigation, validation of grievance, and recommendation of the Ethics Committee regarding the standing of MASH-certified sober homes. Based on the nature of the grievance, the Committee will make recommendations and/or disqualify a sober home certification.
• The formal grievance should be documented on the MASH formal grievance form, which is found on the File a Grievance [redacted] page.
• The formal grievance procedure should not be used for retribution or personal/agency gain.
• Please note: Your grievance may need to be forwarded to a local, state, federal, or judicial authority. The Massachusetts Alliance for Sober Housing does not address or enforce anything that would require legal enforcement. If your grievance requires further action by an outside agency, The Massachusetts Alliance for Sober Housing will close the grievance and inform the complainant of the decision.

PROCESS:

I. The complainant is required to file a grievance online through the MASH website. Under special circumstances where a complainant is unable to physically file a grievance, a MASH staff member may assist;
II. Upon receipt of a grievance, the investigator from Recovery Homes Collaborative (RHC) shall notify the MASH Executive Director (ED) and the MASH Ethics Committee Chair via email;
III. The RHC investigator will conduct an investigation of the grievance and may do an in-person site visit. Site visits to a MASH-certified sober home may be unannounced and the investigator must be allowed to enter the home regardless of whether or not the owner/operator is present. These site visits may also incl member of the MASH staff although the staff has no input on whether or not a grievance is substanti
IV. Upon completion, the RHC investigator will issue a report to the ED and the Ethics Committee;

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V. The ED and the Ethics Committee Chair will review the report and determine whether or not the Ethics Committee Chair needs to reach out to the operator to gather additional information to present to the Ethics Committee for review;
VI. At its monthly meeting, the Ethics Committee will consider and discuss the RHC report and any supporting documentation, and determine whether or not the grievance is substantiated. If the grievance is substantiated the Ethics Committee will make recommendations for corrective action;
VII. If the corrective action includes suspension or revocation of the certification, the ED and Ethics Committee Chair will prepare documentation for consideration by the Board of Directors (BOD);
VIII. In considering recommendations for corrective actions, the Ethics Committee will consider the concept of progressive discipline;
IX. If the BOD votes to suspend or revoke certification, the operator will be sent a certified letter with the BOD decision (the letter will include the standards and/or ethics violated). The operator will be invited to contact the ED and let MASH know if they wish to appeal the decision. If the operator wishes to appeal the decision he/she will be invited to the next board meeting to meet with the BOD;
X. Notice of the conclusion of the grievance will be provided to the Ethics Committee.

FORMAL GRIEVANCE
It's important to follow the grievance procedure carefully and to document all pertinent facts, dates and information when filing a report or claim.

Step 1: Filing
A formal grievance should be filed within 30 days of when the complainant became aware of or suspected violation of MASH ethics or standards. The formal grievance should be documented on the MASH formal grievance form. Verbal grievances will not be acted upon.

Step 2: Submission
The completed MASH formal grievance form will be directed to the Recovery Homes Collaborative's designee (investigator) for prompt processing.

Step 3: Notification of Receipt
Respondent should be notified by email or telephone within 3 business days of the receipt of the grievance. The investigator will forward a copy of the grievance to the MASH Executive Director and the MASH Ethics Committee.

Step 4: Investigation
Within 14 days of receipt of the written grievance, the investigator will complete an investigation of the matter and report the findings in writing to the MASH Executive Director and Ethics Committee. The investigation may include telephone or in-person interviews with the parties and witnesses, site visits to the sober home and review of written records. Site visits to a MASH-certified sober home may be unannounced and the investigator must be allowed to enter the home regardless of whether or not the owner/operator is present. An extension of no more than 14 days may be granted for investigations that take longer than the initial 14-day timeframe.

Within 30 days of receipt of the findings of the investigator, the Ethics Committee will record its findings and decision. An extension of no more than 30 days may be granted for investigations that take longer than the initial 30-day timeframe. No member of the Ethics Committee shall intentionally try to stall, prolong, or delay proceedings. The Ethics Committee may render its decision solely on the basis of the grievance and the investigator's report or may request the complainant or respondent to appear separately in front of the Ethics Committee to gather additional information. A complainant or respondent does not have the r demand to appear in person before the Ethics Committee.

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Step 5: Presentation to the Board

If the Ethics Committee determines that a house should be recommended for suspension, decertification or denial of an operator's certification; they must present this to the MASH Board of Directors for their determination. The presentation shall include the original grievance; the RHC investigation report, additional information as a direct result of the grievance, and the recommendation or action recommended.

Step 6: Board Decision / Recommendation (in the case of a suspension, decertification or denial)

The MASH Board of Directors will discuss and vote on the suspension, decertification or denial of Certification. A report of the findings, voting results and corrective actions to be taken will be provided to the respondent via certified letter within 14 business days after the general meeting. The proceedings will be recorded in the meeting minutes as an official record. If an operator wishes to appeal the board's decision they will be given the opportunity to meet with the BOD at the next BOD meeting. The operator must inform the MASH ED that they would like to appeal the BOD's decision prior to the next BOD meeting.

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