Policy Title	Detroit CoC Non--Discrimination, Equal Access to Housing, and Preventing Family Separation Policy
Date Developed/Revised	June 8, 2018
Date Adopted by Detroit CoC Board of Directors	August 17, 2018
Signed (Detroit CoC Board Chair	
	Curtis Smith

All Detroit Continuum of Care (CoC) Program recipients must complying with all federal, state, and local laws, regulations and guidance. This policy intends to ensure that the homelessness response system is following all applicable laws, regulations and guidance that has been provided on Fair Housing, Equal Access to Housing, and Preventing Family Separation. Additionally, ensuring that consumers accessing housing and services are treated with dignity and respect.

In addition to CoC Program recipients, the regulations and guidance referenced in this policy apply to recipients funded under ESG and CDBG. This policy applies to all staff, volunteers, interns working for CoC Program recipients; ESG and CDBG recipients and sub-recipients; Coordinated Entry Implementers; CoC Lead Agency; Collaborative Applicant, HMIS Lead and all other applicable individuals in service to those experiencing homelessness in the Detroit CoC.

Non-Discrimination and Equal Access Policy

All housing and services coordinated through the Continuum of Care must be available to all eligible persons, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, gender expression, marital status, height, or weight. The CoC and its partners will take all necessary steps to ensure that housing and services are administered in accordance with all applicable Federal and State civil rights laws, including, but not limited to:

- Fair Housing Act, a Federal law which prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Section 504 of the Rehabilitation Act, a Federal law which prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, or national origin under any program receiving Federal financial assistance.
- Title II of the Americans with Disabilities Act, which prohibits public entities, which including State and local governments, from discriminating against individuals with disabilities in all

their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance.
- Title III of the Americans with Disabilities Act, which prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.
- HUD's Equal Access in Accordance with Gender Identity Rule, which prohibits discrimination based on sexual orientation, gender identity, and marital status.
- Michigan's Elliott-Larsen Civil Rights Act, which prohibits discrimination based upon religion, race, color, national origin, age, sex, height, weight, familial status, or marital status.

All clients shall be informed of their right to access housing and services without discrimination, and of their right to initiate a grievance if they believe they have been discriminated against.

Preventing Family Separation Policy

Families experiencing homelessness should not be separated when receiving services unless the health and well-being of children are at immediate risk. The age and gender of a child under the age of 18 shall not be used as a basis for denying a family's admission to any housing services. In addition, a broad definition of family must be used that allows for single parent households of any gender identity, two parent households including same sex parents and LGBT parents, and extended families to be served together with their children.

Furthermore, in compliance with HUD's Equal Access in Accordance with Gender Identity Rule, all households that present as a family must be served together as a family, whether that family includes adults and children, or just adults, and regardless of the age, disability, marital status, actual or perceived sexual orientation, or gender identity of any member of the family.

Procedures

It is the responsibility of the Detroit CoC Program recipients, Coordinated Entry Implementers, ESG and CDBG recipients and sub-recipients, to understand and follow all applicable laws, regulations, and guidance. This includes, but not limited to, reviewing internal policies and procedures and screening procedures, and ensuring all staff interacting with clients understand the various regulations/guidance.

All Coordinated Entry Access Points, CoC Program recipients, and ESG and CDBG recipients and sub-recipients must post related HUD Equal Access Fact Sheets in locations accessed by clients. The CoC Lead Agency will provide Fact Sheets if needed.

The CoC Lead Agency will coordinate an annual training to the Detroit CoC to inform CoC Program recipients of the laws, regulations, and guidance and strategies to meet requirements. Additional training and technical assistance can be requested to the CoC Lead Agency and will provided as time and resources are available.

The CoC Body will use appropriate and inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that consistently affirms the Detroit CoC's commitment to serving all eligible clients in adherence with the HUD Equal Access Rule.

Clients who feel that they have been a victim of discrimination and/or has experienced family separation by a local provider within the Detroit CoC may file a grievance with the Detroit CoC Lead Agency (click here) and HUD's Office of Fair Housing (click here). If the complaint involves an ESG or CDBG funded program, the complaint will be referred to the City of Detroit. The CoC (as applicable and appropriate) will take immediate action to resolve inappropriate behavior and harassment by any person (staff, volunteers, contractors or clients).The CoC will investigate claims and will work with HUD to stop and prevent discrimination. These steps may include, but are not limited to:

- Technical Assistance
- Complying with a Corrective Action Plan (CAP)
- Sharing with CoC Board
- Written report of Equal Access Rule violation to HUD.
- Potential discontinued funding