

FL-515 Continuum of Care Bay, Calhoun, Gulf, Holmes, Jackson & Washington Counties

Anti-Discrimination Policies

Overview

FL-515 Continuum of Care is committed to ending homelessness within its 6-county geographic area. FL-515 has adopted these policies and procedures to ensure that all individuals and families experiencing homelessness have equal access, without discrimination, to all necessary housing and supportive services. These policies and procedures provide guidance to all service providers to prevent discrimination in their policies and in their interaction with homeless and at-risk clients. Through these policies and procedures, FL-515 CoC will comply with all applicable civil rights and fair housing laws and regulations, including HUD's Equal Access and Gender Identity Rules.

Equal Access Protections

Equal Access Policy:

All service providers in the FL-515 CoC region are prohibited from discriminating against anyone seeking homeless services based on race, color, national origin, religion, sex, disability, age, gender, LGBTQ status, or marital status. This includes but is not limited to, the CoC Lead Agency, agencies funded through the Continuum of Care and Emergency Solutions Grants (ESG) programs, and service providers funded by other federal and state programs.

FL-515 CoC operates a coordinated entry system that provides equal access to all persons, especially those least likely to seek or receive services. This system allows all participating agencies to comply with all applicable civil rights and fair housing laws and regulations, including HUD's Equal Access and Gender Identity Rules.

Equal Access Procedures:

FL-515 CoC will:

- Provide annual and as-needed training to service providers and others regarding the HUD Equal Access and Gender Identity Rules and related requirements.
- Use appropriate and inclusive language in communications, publications, training events, personnel handbooks, and other policy documents that affirm the CoC's commitment to serving all eligible clients in adherence with the HUD Equal Access and Gender Identity Rules.
- Support all clients in understanding their privacy rights and the implications of releasing information.
- Regularly monitor CoC-funded and ESG-funded agencies and regional coordinated entry systems to ensure compliance with HUD's Equal Access and Gender Identity Rules, other applicable civil rights, and fair housing laws and regulations.

All service providers will:

- Make sure that staff and volunteers understand that a client may present their gender differently than the way staff and volunteers identify their gender.
- Ensure that all staff and volunteers maintain the confidentiality of a client's legal name and sex at birth and understand the potential impact that disclosure can have on a client's progress toward self-sufficiency.
- When possible, ensure that new construction and rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
- Take prompt action to resolve inappropriate behavior, treatment, harassment, or any other equal access issues by staff, volunteers, or clients.
- Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure that all persons have equal access to the agency's services.

Service provider staff will:

- Do their best to ensure client safety and prevent harassment.
- Not consider a client or potential client to be ineligible for services because their appearance or behavior that does not conform to gender stereotypes.
- Not ask questions or seek information concerning a person's anatomy or medical history beyond that necessary to determine program eligibility.
- Not require a person's gender identity to match the gender listed on an ID or other documents.
- Help clients understand the resources available to help them obtain legal identification documents.
- Use the client's preferred gender and pronoun.
- Keep clients' transgender status confidential, unless the client wants to share this information.

- Treat clients' gender identity and sex at birth as confidential medical information that will not be disclosed without written time-limited consent.

Involuntary Family Separation Policy

In accordance with HUD's CoC and ESG program regulations, involuntary family separation is prohibited in CoC-funded and ESG-funded projects. CoC-funded and ESG-funded projects may not deny admission to any household on the basis of:

- The age or gender of a child under age 18; or
- The gender of a parent or parents; or
- The marital status of a parent or parents.

Faith-Based Activities Policy

Service providers and their staff shall not discriminate against any client or prospective client on the basis of religion, religious beliefs, a refusal to hold a religious belief, or a refusal to attend or participate in religious activities.