

DEPARTMENT: PROGRAM OPERATIONS	SUB-DEPARTMENT: HMIS
CREATED DATE: September 2019	UPDATED DATE:
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EQUAL ACCESS TO HOUSING POLICY

Everyone deserves equal access to housing and to be free from discrimination in housing transactions such as renting, buying a home, securing a mortgage or insurance. Denying an individual or group the right to housing based on their protected status is illegal under federal, state, and local fair housing laws and ordinances.

The Coalition for the Homeless of Houston/Harris County (CFTH), is committed to complying with all requirements regarding the HUD Equal Access Rule and all other all federal, state and local non-discrimination and privacy laws. The intent of this policy is to standardize the quality of assistance persons experiencing homelessness can expect from CFTH and its staff. CFTH is required to comply with all applicable anti-discrimination and equal access regulations.

POLICY ACCESS AND AMENDMENT

The Coalition for the Homeless of Houston/Harris County will post this policy on its official website and provide a copy to any individual upon request. This policy is consistent with current non-discrimination standards issued by HUD.

EQUAL ACCESS POLICY

CFTH and its subrecipients shall not discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, age, or gender, nor on the basis of LGBTQ status or marital status.

CFTH and its subrecipients will ensure equal access to programs for all individuals and their families; provide housing, services, and/or accommodations in accordance with a clients' gender identity; and determine eligibility without regard to actual or perceived sexual orientation, gender identity, or marital status

ANTI-DISCRIMINATION REQUIREMENTS FOR CONTINUUM OF CARE (COC) PROGRAM RECIPIENTS AND EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM RECIPIENTS

Recipients and sub-recipients of CoC Program- and Emergency Solutions Grant (ESG) Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

- a) Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- b) Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- c) Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- d) Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, 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.
- e) Title III of the Americans with Disabilities Act 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.

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In addition, HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

POLICIES ON FAITH BASED ACTIVITIES

Coalition for the Homeless of Houston/Harris County, sub-recipients, and agency staff shall not, in providing program assistance, discriminate against a project participant or prospective project participant on the basis of religion or religious belief. In providing services supported in whole or in part with federal financial assistance, and in their outreach, activities related to such services, projects shall not discriminate against current or prospective project participants on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.