

OUT-WAYNE COUNTY CONTINUUM OF CARE

FAIR HOUSING AND ANTI-DISCRIMINATION POLICY

July 2022

The Out-Wayne County Continuum of Care (the CoC) will work with persons experiencing homeless and those at-risk of homelessness to identify housing and service needs while providing access to both. Additionally, the CoC will collaborate with area service providers and partner organizations to illuminate the issues that contribute to homelessness and create solutions. Collectively the Out-Wayne County CoC (The CoC) contends that all persons have the right to equal opportunity, under local, state, and federal laws, in rental, sale, and financing of housing. As a result, the CoC will not deny assistance to any person based on their race, color, religion, sex (including gender identity and sexual orientation), familial status, national origin, and disability.

In our efforts to prevent and end homelessness in Out-Wayne County, the CoC adheres to the following principles, values and philosophies:

- **Housing First:** a housing assistance approach that prioritizes permanent housing as a basic necessity and foundation for self-sufficiency
- **Client-Centered Service:** a housing assistance approach that allows program participants to lead the process and make decisions about their housing goals and how to achieve them
- **Trauma-Informed Care:** a housing assistance approach that acknowledges the impact and intersectionality of trauma and avoids acts that could perpetuate that trauma

The CoC will administer programs based on applicable Federal, State, and Local laws, which include but are 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 of 1973, 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 of 1964, 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 of 1990, 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 of 1990, 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. The CoC strives to ensure appropriate services are matched based on client choice.

The CoC will work continuously to ensure its programs and services are accessible and beneficial to all. Regular program/service development, implementation, and evaluation, as well as direct feedback from program/service participants will help the CoC to determine if it is meeting the needs of its service area in ways that are effective, efficient, and equitable. Strategies the CoC will employ to achieve this objective include:

- Advocating for increased access to stable, safe, and affordable housing;
- Collecting demographic information and using data to ensure no disparities in program/service delivery;
- Offering a “no wrong door” approach to ensure that entrance into and navigation of our homeless response system is low-barrier;
- Engaging persons with lived experience and expertise in homeless in program/service design, implementation, and evaluation, and

Utilizing participatory research to engage clients in the process of program implementation, evaluation creation and data analysis.

To ensure equal access and anti-discrimination in our system, the CoC will utilize multiple avenues and mechanisms to ensure awareness of programs and services to the public at large, included and not limited to: hosting community forums, leveraging social media, circulating a brochure of programs and services. These actions will help the CoC to strengthen its network and build coalitions across service area. Indicators that we have achieved these objectives include:

- **Shifting Decision-Making Power:** all persons who receive services through our homeless response system are actively engaged and have equal opportunity to influence the design, implementation, and evaluation of the system. This can be achieved through voluntary participation in the CoC general membership, CoC board, committees, workgroups, and surveys.
- **Lived-Experience:** the CoC works to preserve the dignity and meet the needs of all persons who receive services through our homeless response system in a timely manner by actively involving all persons with lived experience in the CoC systems planning. All persons have the opportunity to impact the system through both formal and informal channels.
- **Quality Data:** all persons experiencing homelessness have access to the system, can request a copy of their records, and are known by name in real-time, or 2-3 business days. The CoC will also accurately collect data around race, color, religion, sex (including gender identity and sexual orientation), familial status, national origin, and disability.
- **System Outcomes:** the CoC will monitor by-names list data, systems performance measures, and other HMIS data points on a quarterly basis in the effort to track its progress in closing all disproportionality related to race, color, religion, sex (including gender identity and sexual orientation), familial status, national origin, and disability in housing placements, returns to homelessness, and the average length of time from identification to housing.

The CoC Diversity, Equity, and Inclusion (DEI) Committee will review this policy and its programs annually, at the end of the fiscal year, to ensure alignment with the specific needs of our service area and applicable Federal, State, and Local laws. Any violations of this policy will be immediately addressed through the CoC Grievance Procedure, the DEI Committee, and the CoC Board, as needed.