

Chester County Partnership To End Homelessness Anti-Discrimination, Equal Access, and Fair Housing Policies

The Chester County Partnership To End Homelessness (PA-505 CoC) is committed to fair, equal, and equitable access to housing and services for all residents experiencing homelessness in Chester County, Pennsylvania. All Chester County Partnership to End Homelessness member organizations are expected to comply with the following Governance Board-approved anti-discrimination, equal access, and fair housing policies.

In addition, all U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Grant and Emergency Solutions Grant (ESG) funded service providers are required to comply with all federal and state laws, statutes, and regulations related to anti-discrimination, equal access, and fair housing, including but not limited to the following laws and regulatory citations:

- The Americans With Disabilities Act.
- The Civil Rights Act.
- The Fair Housing Act.
- The McKinney-Vento Homeless Assistance Act.
- 24 CFR § 5.105 (a) - Nondiscrimination and equal opportunity.
- 24 CFR§ 5.105 (b) - Equal access to HUD-assisted or -insured housing.
- 24 CFR § 5.106 - Equal access in accordance with the individual's gender identity in community planning and development programs.
- 24 CFR § 100.202 – Prohibitions against discrimination because of handicap.
- 24 CFR § 100.203 – Reasonable modifications of existing premises.
- 24 CFR § 576.407(b) - Affirmative outreach.
- 24 § 576.500 (S) (1) - Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under § 576.407(a) and the affirmative outreach requirements in § 576.407(b).
- 24 CFR § 578.93 - CoC Program Interim Rule - Fair Housing and Equal Opportunity.
- 24 CFR § 578.103 (a) (15) - Affirmatively Furthering Fair Housing.
- Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency."
- Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System.

Anti-Discrimination Policy.

Chester County Partnership To End Homelessness member organizations shall not discriminate based on any protected characteristic, including race, color, national origin,

Chester County Partnership To End Homelessness Anti-Discrimination, Equal Access, and Fair Housing Policies

religion, sex, familial status, disability, age, or gender, nor based on LGBTQIA status or marital status.

In addition, Chester County Partnership To End Homelessness member organizations must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Title II of the Americans with Disabilities Act prohibits public entities 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 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.

Definition of Family Policy.

The Chester County Partnership To End Homelessness definition of family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG or CoC Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

Chester County Partnership To End Homelessness Anti-Discrimination, Equal Access, and Fair Housing Policies

Equal Access Based on Gender, LBGQTQIA Status, or Marital Status Policy.

Chester County Partnership To End Homelessness member organizations shall make housing available to all eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. Providers will provide housing, services, and/or accommodations in accordance with the client's gender identity, determine eligibility without regard to actual or perceived sexual orientation, gender identity, or marital status, and will serve all persons regardless of actual or perceived barriers to services.

In addition, member organizations cannot discriminate based on the composition of the family (e.g., adults and children or just adults), the age of any members of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. A child temporarily away from the home because of placement in foster care is considered a member of the family.

Fair Housing Policy.

Chester County Partnership To End Homelessness member organizations must implement projects in a manner that affirmatively furthers fair housing. While affirmative marketing is incorporated into the Partnership's Coordinated Entry System, this does not preclude member organizations from their responsibilities to affirmatively market housing and supportive services, including to:

- Market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach.
- Provide participants with information on rights and remedies available under applicable federal, State, and local fair housing and civil rights laws.

Reporting Discrimination Policy.

A participant or potential participant who believes their rights were violated should contact the Chester County Department of Community Development (DCD), which serves as the Chester County Partnership To End Homelessness and the PA-504 CoC Collaborative Applicant. DCD can be reached by phone at 610-344-6900 or by email at ccdcd@chesco.org. A DCD staff member will walk the participant or potential participant through the process for submitting a formal complaint.