



Guilford County CoC Anti-Discrimination Policies (Appendix)

Guilford County Continuum of Care (NC-504) Greensboro/High Point

Policy regarding Equal Access in the Continuum of Care (CoC)

Effect Date: April 1, 2018; Last Reviewed: August 21, 2024

The Guilford CoC, represented by Guilford County Continuum of Care member agencies receiving CoC funding are 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.

This policy will be followed by the CoC, all CoC-funded agencies within the CoC and the Coordinated Assessment system (together, “CoC agencies”), and CoC agency and Coordinated Assessment staff, volunteers, and interns (referred to, jointly, as “agency staff” herein).

Equal Access Protections

Equal Access Policy

CoC-funded providers shall not discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, age, gender, LGBT status, or marital status. CoC-funded housing shall be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. The CoC and CoC agencies 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.

Equal Access Procedures for Guilford County CoC

- The CoC will provide annual and as needed training to CoC agencies and agency staff regarding the Equal Access Rule and related requirements.
- The CoC and CoC agencies will use appropriate, inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the CoC’s commitment to serving all eligible clients in adherence with the HUD Equal Access Rule.
- The CoC and CoC agencies will continue to develop partnerships with organizations that can provide expertise around the process of changing gender markers on identification and benefit applications or will ensures subject matter expertise among staff.

- The CoC and CoC agencies support all clients in understanding their privacy rights and the implication of releasing information.

Equal Access Procedures for Agencies

- CoC agencies will ensure that staff, volunteers and contractors understand that a client may not present as the way they identify.
- CoC agencies will ensure all staff, volunteers and contractors maintain the confidentiality of a client's legal name and gender at birth and understands the potential impact that disclosure can have on a client's progress to self-sufficiency.
- When possible, CoC agencies will ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping area, bathrooms, and showers.
- If a CoC program only offers congregate bathrooms or showers, all urinals/toilets and shower heads will have individual stalls to support client safety.
- CoC agencies will offer individual gender-neutral bathrooms and gender-neutral shower rooms, where feasible.
- CoC agencies will mediate and resolve conflicts between clients in a way that is respectful, fair and equitable.
- CoC agencies will take immediate action to resolve inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers, contractors or clients).

Equal Access Procedures for CoC Agency Staff

- Agency staff shall not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes and will serve all individuals that are eligible for the project/program.
- Agency staff shall not ask questions or seek information concerning a person's anatomy or medical history beyond elements necessary for the purpose of providing services.
- If a client needs to be moved for harassment and safety concerns, agency staff will have a preference to move the client with a bias (e.g., move the individual who is having concerns towards the person who may not conform to mainstream gender expression/identity.)
- Agency staff will honor the request of an individual for a private space to complete intake and data collection.
- Agency staff will honor the request of an individual for accommodations based on their personal safety and privacy concerns, whenever feasible. An "accommodation" will not be given as a "requirement."
- Gender identity is not required to match the gender listed on the ID or documents.

- Agency staff will assist the clients without identification documents to understand the resources available to obtain identification documents.
- Agency intake materials will allow for clients to indicate their legal name and the name they prefer to be called.
- Clients with prescribed hormones or other medications as part of their gender-affirming healthcare regime will have access to those medications.
- Agency staff and clients will use client's preferred gender and pronoun and support the client's gender identity.
- Agency staff will be alert to and correct any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their nonconforming gender identity/expression during risk-based conversations.
- Agency staff will keep a client's transgender status confidential, unless the client gives permission to share this information.
- Agency staff will ensure that only essential staff, identified by administrators, are told about a client's transgender status to ensure equal access and safety.
- Agency staff will ensure that when a client's gender identity and sex assigned at birth differ, that difference is treated as confidential medical information and may not be disclosed without specific, time-limited written client consent. Similarly, a client's legal name will be treated as confidential information.

Policies on Involuntary Family Separation

In compliance with CoC Program interim rule 24 CFR § 578.93(e), involuntary family separation is prohibited in CoC- and ESG- funded projects. CoC- and ESG- funded projects may not deny admission to any household on the basis of:

- Age and gender of a child under age 18, or
- Gender or marital status of a parent or parents.

The CoC will work with providers to ensure that placement efforts are coordinated to avoid involuntary family separation.

Any person who believes that they or a family member has experienced involuntary family separation may report the issue to the CoC. The CoC will investigate the claim and take remedial action when appropriate.

Policies on Faith Based Activities

CoC agencies and staff shall not, in providing program assistance, discriminate against a program participant or prospective program 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, programs shall not discriminate against current or prospective program beneficiaries 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.