



North Carolina Balance of State Continuum of Care

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NC Balance of State Continuum of Care Anti-Discrimination Policies

Overview

The North Carolina Balance of State Continuum of Care (NC BoS CoC) is committed to ending homelessness across its entire 79-county geographic region. To provide all individuals and families equal access to necessary housing and services to meet this goal, the NC BoS CoC has adopted these policies and procedures to ensure no one seeking services from the CoC is discriminated against. All agencies in the CoC including, but not limited to, the CoC lead agency (the North Carolina Coalition to End Homelessness), agencies funded through Continuum of Care (CoC) and Emergency Solutions Grants (ESG) programs, and homeless service agencies funded by other federal and state programs commit not to discriminate against anyone seeking homeless services based on race, color, national origin, religion, sex, familial status, disability, age, gender, LGBTQIA status, or marital status.

These policies and procedures provide guidance to staff and volunteers of all CoC agencies to prevent discrimination in agency policies and during any interactions with clients. Through these policies and procedures, the NC BoS CoC will comply with all applicable civil rights and fair housing laws and requirements, including HUD's Equal Access Rule.

Equal Access Protections

Equal Access Policy

Providers of housing and services in the NC BoS CoC shall not discriminate on the basis of race, color, national origin, religion, sex, familial status, disability, age, gender, LGBTQIA (lesbian, gay, bisexual, transgender, queer/questioning, intersex, allies) status, or marital status. Providers shall make housing available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. The CoC and all participating agencies will provide housing, services, and/or accommodations in accordance with a clients' 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.

The CoC and agencies in the CoC will develop and operate a coordinated assessment system that provides equal access to all persons, especially those least likely to seek or receive services, and that permits all agencies to comply with applicable civil rights and fair housing laws and requirements.

Equal Access Procedures

The NC BoS CoC will:

- Provide annual and as-needed training to agencies and agency staff regarding the Equal Access Rule and related requirements.
- 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.

- Continue to develop partnerships with organizations that can provide expertise around the process of changing gender markers on identification and benefit applications or can ensure subject matter expertise among staff.
- Support all clients in understanding their privacy rights and the implication of releasing information.
- Regularly monitor CoC and ESG-funded agencies and coordinated assessment systems to ensure compliance with the Equal Access Rule and other applicable fair housing and civil rights laws and related requirements.

Agencies will:

- Ensure staff, volunteers, and contractors understand that a client may present their gender differently than the way they identify.
- Ensure all staff, volunteers, and contractors 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 to self-sufficiency.
- When possible, ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
- Offer individual stalls in congregate bathrooms, urinals/toilets, and shower heads to support client safety whenever possible.
- Offer individual gender-neutral bathrooms and gender-neutral shower rooms, where feasible.
- Mediate and resolve conflicts between clients in a way that respects clients and treats them fairly and equally.
- Take immediate action to resolve inappropriate behavior, treatment, harassment, or equal access issues by any person (staff, volunteers, contractors, or clients). Follow the prescribed agency grievance policy as with any other grievance.
- Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure equal access to all groups to the agency's services.

Agency staff will:

- Not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes and will serve all individuals eligible for the program.
- Not ask questions or seek information concerning a person's anatomy or medical history beyond elements necessary for the purpose of providing services.
- Try to ensure client safety and prevent harassment. If at all possible, staff will remove perpetrators of harassment before asking victims to move.
- Honor the request of an individual for a private space to complete intake and data collection.
- Honor all requests, to the extent possible, for special accommodations for anyone who feels discriminated against or unsafe.
- 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."
- Not require an individual's gender identity to match the gender listed on an ID or other documents.
- Assist clients without identification documents to understand the resources available to obtain identification. Make available intake materials that allow individuals to indicate both their legal name and the name they prefer to be called.
- Give clients with prescribed hormones and other medications as part of their gender-affirming healthcare regime full access to those medications.
- Use the client's preferred gender and pronoun.
- Correct any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their non-conforming gender identity/expression during risk-based conversations.



- Keep client's transgender status confidential, unless the client gives permission to share this information.
- Tell only essential staff, identified by administrators, regarding a client's transgender status to ensure equal access and safety.
- Treat a client's gender identity and sex assigned at birth as confidential medical information that will not be disclosed without specific, time-limited client consent. Similarly, a client's legal name shall be treated as confidential information.

Involuntary Family Separation Policy

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

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

The NC BoS CoC will work with providers to ensure shelter placement efforts are coordinated to avoid involuntary family separation. CoC programs should publicly post in their place of business notification that any person who believes that they or a family member has experienced involuntary family separation may report the issue to CoC staff at bos@nceh.org. The CoC will investigate the claim and take remedial action when appropriate.

Faith Based Activities Policy

CoC agencies and staff shall not, in providing program assistance, discriminate against a program participant or prospective participant on the basis of religion or religious belief. In providing services supported in whole or 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.

