

St. Paul / Ramsey County Continuum of Care (CoC) (MN-501) Nondiscrimination Policy

Background

Heading Home Ramsey is committed to providing housing and services in an environment in which all individuals are treated with respect and dignity and with equal treatment and opportunity.

Heading Home Ramsey's Nondiscrimination Policy applies to staff, volunteers, and contractors at all partner agencies, including agencies that receive CoC and ESG funding. We strongly encourage all partners, regardless of funding source, to adopt this policy.

Policy

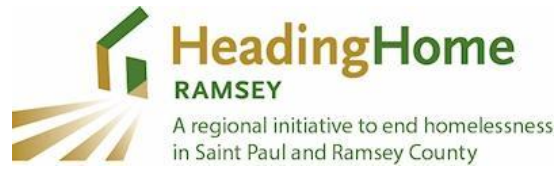
The policy of Heading Home Ramsey (MN-501) is to provide equal opportunity and equal consideration to all peoples without regard to race, religion, ancestry, national origin, color, creed, sex or gender identity, age, disability (including physical, mental or cognitive), marital status, sexual orientation, or public assistance status.

The CoC, its member agencies, its recipients of CoC, ESG, or HOPWA funds, and its Coordinated Entry System agents and partners shall not discriminate or treat unequally or unfairly in the delivery of services any person because of race, religion, ancestry, national origin, sexual orientation, or sex; and will comply with all federal, state, and local anti-discrimination laws.

This policy affirms the CoC's commitment to upholding the following laws that protect all people from discrimination while seeking shelter and housing:

- **Fair Housing Act** prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, and disability.
- **HUD's Equal Access Rule** 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.
- **The CoC Program interim rule** 24 CFR 578.93(c) requires recipients of CoC Program funds to affirmatively 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 and maintain records of those marketing activities. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR

Adopted by the Heading Home Ramsey (HHR) Governing Board on July 26, 2023, effective immediately.



5.105 (a)(2). Nondiscrimination and affirmative outreach requirements for the ESG program are located at 24 CFR § 576.407(a) and (b)

- **The Violence Against Women Act (VAWA) protects** applicants, tenants, and program participants from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.
- **Section 504 of the Rehabilitation Act** prohibits discrimination based on disability under any program or activity receiving Federal financial assistance.
- **Title VI of the Civil Rights Act** prohibits discrimination based on race, color, or national origin under any program receiving Federal financial assistance.
- **Title II of the Americans with Disabilities Act** 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** 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 based on disability.
- **The Minnesota Human Rights Act** is the state's civil rights law that prohibits discrimination in business, credit, education, employment, housing, public accommodations, and public services.

Reasonable Accommodation

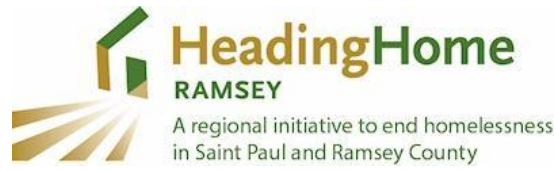
Under the Americans with Disabilities Act, the Fair Housing Act, and the Minnesota Human Rights Act, recipients of CoC Program and ESG funds must make reasonable accommodations to rules, policies and procedures where necessary to ensure that residents with physical, mental or cognitive disabilities are able to benefit from funded programs to the same extent as residents without disabilities.

Obligation to Inform

The CoC, its member agencies, its recipients of CoC Program, ESG, or HOPWA funds, and its Coordinated Entry System agents and partners shall inform in plain writing all persons seeking services of these policies, the process for requesting a reasonable accommodation, and the process for filing a nondiscrimination complaint.

Reporting a Nondiscrimination Complaint

At any time during the coordinated entry process, applicants for housing or services have the right to file a complaint, should they feel that the nondiscrimination principle has been violated.



All Applicants, whether individuals or families, will be provided with the process for filing a complaint. All complaints will be addressed and resolved in a timely and fair manner.

- For nondiscrimination complaints, contact the Department of Housing & Urban Development, Chicago Regional Office: (800) 765-9372 or <https://www.hud.gov/fairhousing/fileacomplaint>
- Minnesota Department of Human Rights: 651-539-1100 or Toll Free at 1-800-657-3704
- For complaints with Heading Home Ramsey Continuum of Care (CoC) Coordinated Entry policies or procedures including the assessment or referral processes contact: leigh.ahmed@co.ramsey.mn.us
- For housing program related complaints, grievances will be directed to the appropriate housing provider for resolution.

Retaliation

Heading Home Ramsey, the St. Paul/Ramsey County Continuum of Care policy is that the Continuum of Care, its member agencies and its Coordinated Entry System agents and partners shall not retaliate against a person who files a charge of discrimination, participates in a discrimination proceeding, or otherwise opposes an unlawful practice.