

Nondiscrimination Policy

Purpose: Homeward has established a non-discrimination policy for actions of the Board of Directors, all programs funded by, or receiving letters of support from, Homeward as well as subrecipients of HUD funds within the Des Moines/Polk County Continuum of Care. This policy is in place regardless of the source of funding including Federal, State or private funds to comply with applicable civil rights, equal access and fair housing laws and requirements.

Policy: It shall be the policy of Homeward that actions and deliberations of the board will not discriminate against individuals or families seeking services within the geographic area served by the Des Moines/Polk County Continuum of Care (CoC). This policy applies to programs funded through actions of the board.

Application of Homeward’s Non-Discrimination Policy requires fair and equal access.

1. All people have fair and equal access programs regardless of race, color, creed, national origin, ethnicity, religion, sex, age, familial status, physical or mental disability, actual or perceived sexual orientation, gender identity, or marital status as well as where or how individuals present for services.
3. Programs will ensure their physical locations are accessible to people with disabilities.
4. Programs will make every effort to serve individuals or families who speak languages commonly spoken in the community and take reasonable steps to offer program materials and participant instruction in multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency.
5. Programs will make every effort to ensure effective communication with individuals with disabilities including the provision of appropriate auxiliary aids and services necessary to ensure effective communication (e.g. Braille, large type, assistive listening devices, and sign language interpreters).
6. The age and gender of a child under age 18 must not be used as a basis for denying any family’s admission to a program.
7. CoC, ESG, Street Outreach Services, Safe Haven and Rapid Rehousing programs shall be open to immigrants without restrictions. Non-profit organizations can’t inquire of persons regarding their immigration status for these programs and therefore can’t discriminate against them.

Nondiscrimination and equal opportunity provisions include the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability or familial status
- 24 CFR Part 5 2016 Equal Access in Accordance with an Individual’s Gender Identity in Community Development and Planning.



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- 24 CFR Parts 5, 200, 203, 236, 400, 570, 574, 882, 891, and 982 Equal Access to Housing in HUD Programs - Regardless of Sexual Orientation or Gender Identity
 - CoC FAQs, Date Published: July 2014, FAQ ID: 1529 “How is the definition of ‘family’ that was included in the *Equal Access to Housing in HUD Programs – Regardless of Sexual Orientation or Gender Identity* apply to recipients and subrecipients of ESG and CoC Program funds?”
 - Section 401(b)(1)(D) of The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) explicitly declares that programs necessary to protect life and safety are to remain open to all persons without regard to immigration status. Programs open to immigrants without restrictions are CoC, ESG, Street Outreach, Safe Haven and Rapid Rehousing programs.
 - Section 504 of the Rehabilitation Act of 1973, as amended by the ADA Amendment Act of 2008, prohibits discrimination on the basis of disability under any program or activity receiving Federal assistance.
 - Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance.
 - Title II of the Americans with Disabilities Act prohibits public entities, which includes State and local governments, and special purpose districts, 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 includes shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

