

## Equal Access to Housing/Anti-Discrimination Policy

All Snow Belt Housing Company, Inc. (SBHCI) programs and projects, to include Continuum of Care (CoC) and ESG Program-funded projects managed by SBHCI, shall market to and serve all 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 or accommodation and without regard to actual or perceived sexual orientation, gender identity, or marital status.

It shall be the policy of SBHCI to maintain and promote a safe environment for all persons in all programs managed by said company. All staff, volunteers, and contract providers are prohibited from engaging in any form of discrimination against or harassment of persons on the basis of actual or perceived race, ethnicity, immigration status, familial status, national origin, sex, disability, sexual orientation, gender identity, or gender expression. Any discrimination against or harassment of staff or clients within SBHCI programs will not be tolerated. SBHCI programs shall recognize and address the individual needs of each client and shall apply policies and practices fairly to all clients. If you have experienced harassment or discrimination in violation of this policy, please file a grievance according to facility policy. All grievances will be reviewed and investigated immediately.

All SBHCI programs and projects shall also comply with all State of New York and Federal statutes relating to nondiscrimination. These include but are not limited to:

- Fair Housing Act (Title VIII of the Civil Rights Act of 1968), which prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Title VI of the Civil Rights Act of 1968, (P.L. 88-352, 42 U.S.C. § 2000d, and implementing regulations) which prohibits discrimination on the grounds of race, creed, color, sex, religion, ancestry, age, condition of physical handicap, marital status, political affiliation, or national origin in programs and activities receiving federal financial assistance.
- 24 CFR 5.105(a)(2) – Equal Access to HUD-Assisted or -Insured Housing, which states housing assisted by HUD or subject to a mortgage insured by HUD shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule (2012), which ensures that HUD programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
- Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs Final Rule (2016), which ensures equal access for individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD).
- Sections 503 and 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794, 45 C.F.R. Part 84), which prohibits discrimination on the basis of handicaps.
- Americans with Disabilities Act
- Title II, which prohibits public entities, which includes states 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, which prohibits private entities that own, lease, and operate places of public accommodation, including shelters, social service establishments, and other public accommodations providing housing, from discrimination on the basis of disability.

- NYS Sexual Orientation Non-Discrimination Act (SONDA) (2012), which prohibits discrimination on the basis of actual or perceived sexual orientation in employment, housing, public accommodations, education, credit and the exercise of civil rights in NYS.
- NYS Gender Expression Non-Discrimination Act (GENDA) (2019), which prohibits discrimination, harassments, and retaliation on the basis of gender identity or expression, including a persons' actual or perceived gender-related identity, appearance, behavior, expression, or other gender- related characteristic regardless of the sex assigned to that person at birth.
- Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made.

Board approval was given at the Snow Board meeting on December 17, 2020.