

INCLUSION AND NON-DISCRIMINATION POLICIES FOR THE WESTERN PA CONTINUUM OF CARE

BACKGROUND

The Western PA Continuum of Care (CoC) works to foster a sense of collaboration and shared purpose among its participating members around the work to end homelessness throughout its 20- county region. As such, the CoC is committed to providing a client-centered, culturally aware service-delivery system in which all individuals, including people of color, LGBTQI persons, persons with disabilities, immigrant populations, and other historically marginalized populations, receive the assistance needed to end their homelessness. To this end, the CoC's Governing Board has: established a Diversity, Equity, Inclusion & Belonging (DEIB) Committee; participated in DEIB training over the last year; provided DEI-focused CoC training; and all Board members have signed the CoC's Truth and Values statement¹. To further this work, the Governing Board is now introducing the below non-discrimination and inclusion policies for CoC-wide implementation.

In addition to adhering to this policy, all homeless assistance providers must manage projects in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in the [Fair Housing Act](#), Section 504 of the [Rehabilitation Act](#), Title VI of the [Civil Rights Act](#), Titles II & III of the [Americans with Disabilities Act](#), HUD's [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity](#) (2012 Equal Access Rule), HUD's [Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs](#), and the Western PA CoC policy – [Acknowledgement of Compliance Requirements with HUD Regulations and Notices](#). Additionally, many local municipalities have relevant anti-discrimination ordinances by which to abide. For a comprehensive, current list of localized statutes, visit: <https://payoutcongress.org/localnondiscrimination/>.

NON-DISCRIMINATION & INCLUSIONARY POLICIES

The Western PA CoC's Non-discrimination and Inclusion Policies promote programming that provide the highest quality of services, without bias, and are delivered in an equitable, trauma-informed manner.

NON-DISCRIMINATION: Each provider must have a zero-tolerance policy prohibiting *intentional* discrimination regarding staff, clients, and the public based on actual or perceived disability, race, ethnicity, color, national origin, ancestry, religion, age, sex, sexual orientation, gender identity and expression, marital status, familial status, source of income, or domestic or sexual violence victim status, ensuring that all participants are afforded equal opportunities (See **Appendix A** for *Definitions of Prohibited Discrimination*). In instances where the discrimination was an *unintentional* first offense, the CoC supports using the isolated instance as a teachable moment, both for personal and organizational growth.

INCLUSION: Providers must not only have a policy against discrimination, but they must also take positive, concrete steps toward inclusion. To this end, providers must have

¹ Truth and Values Statement is provided as Appendix C

inclusionary policies related to general programming, housing and facilities (as applicable), and language (paperwork, names, and pronouns). The CoC recognizes that individuals have the right to be called by their chosen name and referred to by the gender pronoun that they designate and that matches their gender identity as they know themselves to be.

EQUAL ACCESS: Programs must affirmatively provide equal access to their housing and supportive services in a nondiscriminatory manner that ensures that all persons are afforded equal opportunities. The CoC acknowledges that additional services/support may be needed in order to provide equal access to housing opportunities. For example, some populations may need additional assistance locating housing and executing a lease.

APPLICABILITY

These policies promote the safety, dignity, and well-being of all individuals and families accessing and utilizing programs associated with the Western PA CoC. All recipients of Emergency Solutions Grant (ESG), Continuum of Care, Home4Good, or any other program which either requires the CoC as its applicant or seeks the support of the CoC, shall operate in accordance with these policies in addition to following all applicable law.

THE COC'S COMMITMENTS TO PROMOTE INCLUSION AND ADDRESS DISCRIMINATION

INCLUSIVE ENVIRONMENT: To create and foster an inclusive environment in venues in which CoC members join together to advance our collective work. As such, the Western PA CoC will not tolerate the use of hate speech, hate language or hate symbols by CoC members in the course of participating in or conducting work on behalf of or related to the CoC. Should a CoC member experience any form of discrimination, intolerance, physical harassment, sexual harassment, and/or verbal harassment while participating in CoC-related trainings, meetings and/or events, they should feel empowered to immediately report such a violation to the appropriate party (i.e., Executive Committee member present, Committee Chair, DCED, CoC Consultant, training facilitator, etc.), recognizing that the appropriate party may vary depending on the context of the violation and the setting. The violation will be brought to the attention of the CoC's Executive Committee which will respond accordingly on a case-by-case basis.

TRAINING: To provide access to trainings so that as a CoC we can:

- Better understand, identify, challenge and control our own implicit bias
- Build cultural awareness to improve our service delivery and to avoid barriers to communication
- Develop a shared language (see **Appendix B**)

DATA: To collect, evaluate, and report system and program performance data using an equity lens:

- Utilize data to identify disparities and increase awareness
- Provide data to the Board and applicable Committees for disparities to be addressed
- Reevaluate data to monitor impact of strategies implemented to promote equity

RESOURCES: Align the necessary resources to continue our work towards a more just and equitable homeless service system. This will include adjustments within the system to address

data findings that point to disparities within the CoC's service delivery. This may include changes to the coordinated entry process, prioritization of resources, service delivery and other elements of the CoC system.

REPRESENTATION: Develop authentic partnerships with community members who have experienced homelessness, as they are best informed to create and/or inform service delivery and program design. In an effort to intentionally diversify the CoC's leadership, those with lived experience, people of color and other marginalized groups will be encouraged to hold seats on the Governing Board, with voting rights and decision-making power, as well as participate in and/or lead CoC Committees.

Moreover, each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided with CoC funding.²

TEMPLATES: Provide program-level policy and paperwork language around inclusionary and nondiscriminatory practices.

PERFORMANCE MEASURES: Additional measures will be added to the renewal project scoring criteria, linking permanent housing placement to equitable service delivery.

This policy is effective as of September 30, 2022 and was approved by the Western PA CoC Board on September XX, 2022.

CoC grantees are required to adopt an organizational or project-level Non-Discrimination Policy by the time they submit their FY2023 renewal application to the Western PA CoC.

ESG grantees are required to adopt an organizational or project-level Non-Discrimination Policy by the time they execute their FY2023 ESG contract with the Pennsylvania Department of Community and Economic Development (DCED).

² This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

APPENDIX A - DEFINITIONS OF PROHIBITED DISCRIMINATIONⁱⁱ

AGE DISCRIMINATION refers to situations in which how old an individual is determines whether or not the person has access to certain terms, conditions or services.

ANCESTRY refers to the nation, country, tribe or other identifiable group of people from which a person descends. It also can refer to the physical, cultural or linguistic characteristics of the person's ancestors. Ancestry discrimination may often overlap with, but is not always synonymous with, national origin discrimination.

COLOR DISCRIMINATION refers to discrimination based on shade or hue of skin, such as Light-skinned or Dark-skinned. A variety of hues exist in every ethnic and racial group; therefore, color discrimination is not always synonymous with race discrimination and can even occur within a single racial group.

DISABILITY refers to a physical or mental impairment that substantially limits an individual's ability to perform a major life activity. The protections against disability discrimination cover (1) individuals who currently have a physical or mental impairment that substantially limits one or more major life activities; (2) persons who previously had a physical or mental impairment that substantially limits one or more major life activities; and (3) persons who are believed to have a physical or mental impairment that substantially limits one or more major life activities, regardless of whether that belief is correct. The protection against disability discrimination includes a duty to provide reasonable accommodations that would allow an individual with a physical or mental disability to access and obtain full enjoyment of employment, public accommodations or housing and real property.

DOMESTIC OR SEXUAL VIOLENCE refers to any act of domestic violence, sexual assault or stalking as defined in sections of the Pennsylvania Code related to rape, incest, sexual abuse of children, unlawful contact with a minor, sexual exploitation of children, statutory sexual assault, involuntary deviate sexual intercourse, sexual assault, aggravated indecent assault or indecent assault.

ETHNICITY refers to membership in a particular cultural group. It is defined by shared cultural practices, including but not limited to holidays, food, language, and customs. Ethnicity may often overlap with ancestry, and like ancestry discrimination, ethnic discrimination may often overlap with, but is not always synonymous with, national origin discrimination.

FAMILY includes, regardless of actual or perceived sexual orientation, gender identity, or marital status: (1) A single person or (2) A group of persons residing together. Federal and local laws prohibit discrimination based on familial status (i.e., one cannot discriminate against households consisting of one or more individuals under 21 years of age and (1) a parent or other person having legal custody of the minor(s) or (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person). The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

Projects funded under the CoC Program may limit housing to families with children, according to 24 CFR 578.93(b)(3). 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 project that receives CoC funds (24CFR 578.93(e)).

GENDER EXPRESSION A person's expression of their gender identity (i.e., appearance, dress, mannerisms, speech, social interactions.).ⁱⁱⁱ

GENDER IDENTITY is a person's inner sense of being male, female, both or neither, regardless of the sex assigned to that person at birth, based on visual biological markers^{iv}, and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents. Programs must not ask participants to provide anatomical information or documentary (ID), physical, or medical evidence of gender identity.

MARITAL STATUS refers to the state of being one of the following: Single, Married, Separated, Divorced, Widowed, Life Partner. Marital status discrimination includes discrimination based on assumed characteristics of people in particular marital status groups.

NATIONAL ORIGIN refers to "the country where a person was born, or, more broadly, the country from which their ancestors came." National origin discrimination includes discrimination based on place of origin or on the physical, cultural, or linguistic characteristics of a national origin group. National origin discrimination includes discrimination on the basis of accent, manner of speaking, or language fluency.

RACE DISCRIMINATION includes discrimination on the basis of physical characteristics associated with a particular race, such as hair texture, facial features and hair color. Individuals of Hispanic or Latino ethnicity, or any ethnicity, may belong to one or more racial group. Race may be related to color but is not synonymous with color. Race is associated with the following groups:

- American Indian/Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment
- Asian: Persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
- Black/African American: A person having origins in any of the Black racial groups of Africa
- Native Hawaiian/Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands
- White: A person having origins in any of the original peoples of Europe and the Middle East
- Bi-racial or Multi-racial: All persons who identify with more than one of the five above races

RELIGIOUS DISCRIMINATION refers to discrimination based on an individual's religious observances, practices or beliefs. It also includes discrimination based on moral or ethical beliefs as to what is right and wrong that are sincerely held with the strength of traditional religious views, regardless of how widespread the particular beliefs or practices are. Religious discrimination may manifest itself as a preference for or against members of a particular religious group. It may also be evidenced as intolerance for observation of religious laws regarding dress, dietary habits, and work schedules.

SEX encompasses both the biological differences between men and women and the cultural and social aspects associated with masculinity and femininity (i.e., gender). Sex assigned at birth is a label usually based on visible genital anatomy, or perhaps on biological information such as DNA or chromosomes.^v Sex discrimination refers to discrimination based on one of the following categories: male/female; pregnancy, childbirth or related medical conditions; sex stereotyping; or change in sex. Sex-specific programs are acceptable only limiting access on the basis of sex is only acceptable in programs for pregnancy, childbirth or related medical conditions. In these types of programs, it is acceptable to limit participation to individuals who were assigned female sex at birth.

SEXUAL ORIENTATION A person's attraction to others based on their gender. Being Gay, Lesbian, Bisexual, or Straight are examples of one's sexual orientation.^{vi} Sexual orientation discrimination includes discrimination based on perception of an individual's sexual orientation, whether that perception is correct or not.

SOURCE OF INCOME refers to any lawful income, subsidy or benefit with which an individual supports themselves and their dependents, including, but not limited to, child support, maintenance, and any federal, state or local public assistance, medical assistance, or rental assistance program.

APPENDIX B - GLOSSARY FOR A SHARED LANGUAGE ACROSS THE COC

ASEXUAL Indicates people who do not feel sexual attraction. Some people say Ace. ^{vii}

BIAS Occurs when rather than being neutral, we have a preference for (or aversion to) a person or group of people. ^{viii}

CISGENDER A term used to describe people who are not transgender and are comfortable with the gender they were assigned at birth. ^{ix}

CULTURAL DIVERSITY Differences in orientation to the world based on the traditions, customs and collective consciousness of the cultural group of which the person is a member. ^x

DIVERSITY Differences due to demographic composition ^{xi}

EQUALITY Everyone gets the same thing. It is a one-size fits all approach. ^{xii}

EQUITY The fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups.^{xiii} Equity means everyone gets what they need. It results in better outcomes for everyone.^{xiv}

GENDER ASSIGNED AT BIRTH The pronouncement of “male” or “female” gender at birth based on visual biological markers. ^{xv}

GENDER EXPRESSION A person’s expression of their gender identity (i.e., appearance, dress, mannerisms, speech, social interactions.).^{xvi}

GENDER IDENTITY is a person’s inner sense of being male, female, both or neither, regardless of the sex assigned to that person at birth, based on visual biological markers^{xvii}, and regardless of the person’s perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person’s appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents. Programs must not ask participants to provide anatomical information or documentary (ID), physical, or medical evidence of gender identity. ^{xviii}

GENDER NON-CONFORMING A term used to describe some people whose gender expression is different from conventional expectations of masculinity and femininity. Not all gender nonconforming people identify as transgender; nor are all transgender people gender nonconforming. ^{xix}

IMPLICIT BIAS Thoughts and feelings are “implicit” if we are unaware of them or mistaken about their nature. This term is used to describe when we have attitudes towards people or associate stereotypes with them without our conscious knowledge. ^{xx}

INCLUSION Involves both being fully ourselves and allowing others to be fully themselves in the context of engaging in common pursuits. It means collaborating in a way which all parties can be fully engaged and subsumed, and yet, paradoxically, at the same time believe that they have not compromised, hidden, or given up any part of themselves. ^{xxi}

INTERSECTIONALITY simply denotes the interconnected nature of social categorizations such as race, class, and gender as they apply to a given individual or group. ^{xxii}

INTERSEX People who possess both male and female biological attributes to a varying degree. They may include sexual organs, DNA, chromosomes, hormones, or a combination. Intersex is always biological. ^{xxiii}

NON-BINARY AND/OR GENDERQUEER Terms used by some people who experience their gender identity and/or gender expression as falling outside the categories of man and woman. They may define their gender as falling somewhere in between man and woman, or they may define it as wholly different from these terms. Not a synonym for transgender and should only be used if someone self-identifies as non-binary and/or genderqueer. ^{xxiv}

QUEER Is considered by many as an all-inclusive and mainstream term to denote the extended LGBTQ+ community. However, some LGBT people find it offensive or that it denies individual identities. Note that it is unacceptable to use the word Queer in a negative way that demeans the LGBTQ community and it is best not to use the word Queer in any conversation with an LGBTQ person unless they use it in an inclusive positive way, first. ^{xxv}

RACE Refers to physical differences that groups and cultures consider socially significant. ^{xxvi}

RACIAL EQUITY The condition that would be achieved if one's racial identity no longer predicted, in a statistical sense, how one fares. When we use the term, we are thinking about racial equity as one part of racial justice, and thus we also include work to address root causes of inequities, not just their manifestation. This includes elimination of policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race or fail to eliminate them. ^{xxvii}

RACISM The belief that a particular race is superior or inferior to another. ^{xxviii}

SEX ASSIGNED AT BIRTH This label is usually based on visible genital anatomy, or perhaps on biological information such as DNA or chromosomes. ^{xxix}

SEXUAL ORIENTATION A person's attraction to others based on their gender. Being Gay, Lesbian, Bisexual, or Straight are examples of one's sexual orientation. ^{xxx} Sexual orientation discrimination includes discrimination based on perception of an individual's sexual orientation, whether that perception is correct or not. ^{xxxi}

SOGI Acronym standing for Sexual Orientation and Gender Identity ^{xxxii}

TRANSGENDER Broad term describing people whose gender expression is non-conforming and/or whose gender identity is different from their gender assigned at birth. It applies to all gender-variant people, including those who choose to identify with neither or both of the two (binary) sexes. This is an adjective that describes a state of being. ^{xxxiii}

TRANSITIONING (GENDER TRANSITION) The process of changing one’s gender expression from one’s birth assigned gender to one’s gender identity. ^{xxxiv} A complex process that occurs over a long period of time and can include various personal, medical, and legal steps. Transitioning does not require medical treatment. Avoid the phrase "sex change."

SYSTEMIC RACISM Racism applied to our social and/or political institutions (rather than “just” interpersonal). ^{xxxv}

- I CFR § 578.75 General operations
- ii Adapted from Philadelphia CoC’s Non-discrimination Policy, unless where otherwise noted.
- lii Bradbury-Sullivan LGBT Community Center Training Institute
- lv Bradbury-Sullivan LGBT Community Center Training Institute
- v Bradbury-Sullivan LGBT Community Center Training Institute
- vi Bradbury-Sullivan LGBT Community Center Training Institute
- vii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- viii Perception Institute
- ix Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- x Ferdman, 2010
- xi Ferdman, 2010
- xii ICW Consulting Group, 2020
- xiii Independent Sector, Why Diversity, Equity and Inclusion Matter
- xiv ICW Consulting Group, 2020
- xv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xvi Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xvii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xviii Philadelphia CoC’s Non-discrimination Policy
- xix Philadelphia CoC’s Non-discrimination Policy
- xx Perception Institute
- xxi Ferdman, 2010
- xxii Merriam-Webster
- xxiii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxiv Philadelphia CoC’s Non-discrimination Policy
- xxv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxvi American Sociological Association
- xxvii Center for Assessment and Policy Development, <http://www.capd.org>
- xxviii American Defamation League
- xxix Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxx Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxi Philadelphia CoC’s Non-discrimination Policy
- xxxii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxiii Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxiv Bradbury-Sullivan LGBT Community Center Training Institute, 2020
- xxxv ICW Consulting Group, 2020

APPENDIX C – WESTERN PA COC DEI VALUES AND TRUTH STATEMENTS

Values Statements (We will . . .)

1. Create and support an inclusive and affirming environment and culture
2. Use respectful language that validates individuals' lived experience
 - * Do ask folks how they identify in terms of disability (e.g. person first or identity first language; race; ethnicity; age; and sexual identity, expression and orientation)
 - * Do ask which pronouns people use; don't assume or guess
 - * Do say, "people experiencing homelessness"; don't say, "homeless people or youth"
 - * Don't say that people experiencing homelessness are "lazy," "homeless by choice"
3. Understand that the Western PA CoC is not a "charity"
 - * We are here to serve, not to save
 - * Recognize and respect the experience, expertise and insights of our clients and our colleagues
4. Understand that all people could have trauma that we're not aware of
 - * Recognize that the experience of homelessness is often a traumatic experience, regardless of quality of/extent of resources
 - * Part of our work is to be responsive to the diverse circumstances that might contribute to experiences of homelessness
 - * Understand that for some, the experience of homelessness or home insecurity might be normalized and respond accordingly

Truth Statements (We believe...)

1. Everyone deserves a home
2. Homelessness is often a consequence of systems of oppression and require an ongoing and sustained commitment to understanding how structural and intersectional oppression and structural privilege contribute to and sustain experiences of homelessness
3. We are an open, inclusive organization that seeks to build and support diversity and belonging

Board member signature: _____

Board member printed name: _____

Date: _____

ORGANIZATIONAL AND PROGRAMATIC POLICY LANGUAGE AND RESOURCES TO PROMOTE NON-DISCRIMINATION & INCLUSION THROUGHOUT THE WESTERN PA COC

INTRODUCTION

This packet contains sample policy language, encouraged practices and tools that can help set a standard of inclusion and safety for all families and individuals who might access services or resources at a given organization throughout the Western PA CoC.

There are two layers of policy which must be considered: one for your organization, its employees, etc.; and another to guide interactions between the organization/program and the client. The majority of the policy samples herein are focused on promoting positive interactions with the CoC's end-user, the person who is either experiencing homelessness or who is about to become homeless. That said, the first set of sample policy language and resources can be used by the organization to foster its own internal interactions and culture; and much of the program/client-level language cited in the second set of sample policy language can also be adapted to guide internal organizational policy since the principles are similar for both policy types.

The sample language herein begins where the [CoC's Non-Discrimination and Inclusion Policies](#) leave off, providing a greater level of detail and nuance. ***Once any policy(ies) is/are drafted, they should be signed by all employees and the organization's executive director, affirming their commitment to equal opportunity, non-discrimination and inclusion.***

Practical organizational next steps, encouraged programmatic practices as well as wording templates are also included.

FOR INTERNAL ORGANIZATIONAL USE

NON-DISCRIMINATION & INCLUSION LANGUAGE

A positive practice is developing organization-wide Equity and Values Statements which promote inclusion and nondiscrimination. To this end, a sample of each is provided which can be used in their entirety, or some portions thereof, so as to create new or enhance existing statements that organizations may abide by.

SAMPLE EQUITY STATEMENT: “ _____ is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and organization’s achievement as well.

We embrace and encourage our employees’ differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

_____ diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees’ varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of _____ have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative." ⁱ ¹

SAMPLE VALUES STATEMENT: "Fundamentally, _____'s work to advance racial justice is embedded in the following core values:

- People of Color: We value the voices, experiences, cultures, intellect and multidimensionality of people of color.
- Justice: We value fairness, the best foundation for unity among all people.
- Transformation: We value the ability of individuals and systems to change in ways that make racial justice possible. We recognize the importance of struggle in fueling transformation.
- Bridging: We value the insights, relationships and holistic understandings that are deepened when divergent paths come together.
- Expression: We value voicing and sharing our viewpoints with integrity even when difficult, unpopular or risky.
- Adaptability: We value relevance and resourcefulness in the face of changing social, economic, political and ideological environments.
- Delight: We value making space for laughter, beauty, and joy in the work of social change." ⁱⁱ

PRACTICAL ORGANIZATIONAL NEXT STEPS

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination from within the organization itself. Additional examples can be found in the [CoC's Non-Discrimination and Equity Policies](#) under the *CoC's Commitments to Promote Inclusion and Address Discrimination*.

- Regularly promote racial and other equities throughout communication platforms. ⁱⁱⁱ
- Maintain a topic-area webpage on racial equity in homelessness and housing that includes up-to-date research and information for funders and the general public. ^{iv}
- Add non-discrimination and inclusive language to all contracts and MOUs, holding all parties to the same standards.
- Hire minority contractors when there are opportunities to do so. ^v
- Commit to diversity of speakers in all in-person and virtual presentations, panels, public talks, and other programs. ^{vi}
- Intentionally consider and select members from underrepresented and priority populations for the board of directors and staff (African-American, Native American, Latin(x), and the LGBTQI community). ^{vii} The diverse board of directors should reflect

¹ Should you choose to use this statement, or a portion thereof, the statement must be cited as it is in the footnotes.

the community it serves. It should be ensured that minorities are not just employed in direct-service positions, but also hold leadership/decision-making positions. ^{viii}

- Select staff and members for board service whose values include racial equity and social justice. ^{ix}
- Provide regular learning and training for board and staff to build capacity around racial and other inequities; including explicit training on structural and historic racism and its impact on systems and policies. ^x
- Ensure that all programs and policy priorities are developed using a racial equity lens. ^{xi}
- Use an intersectional lens and analysis to understand how experiences of systemic racism and homelessness are also shaped by gender and gender identity, socio-economic status, sexual orientation, and other factors, so that our analysis and strategies respond to the diverse experiences of people served. ^{xii}
- Ensure that policies in governance and organizational administration are conducted using a racial equity lens. ^{xiii}
- When looking at policy/ies, mission and/or vision statements, make sure they include language affirming your commitment to inclusion, not just non-discrimination language. ^{xiv}
- Adopt a shared language, such as what was provided in Appendix B of the [CoC's Non-Discrimination and Inclusion Policies](#).
- Include a Race Equity Impact Assessment in your internal evaluations. These questions can help you begin your race equity impact assessment:
 1. Are all racial and ethnic groups that are affected by the policy, practice or decision at the table?
 2. How will the proposed policy, practice or decision affect each group?
 3. How will the proposed policy, practice or decision be perceived by each group?
 4. Does the policy, practice or decision worsen or ignore existing disparities?
 5. Based on the above responses, what revisions are needed in the policy, practice or decision under discussion? ^{xv}
- Allocate prevention funding based on a *Selected Group Strategy* ^{xvi}.
GOAL: Keep marginalized populations housed targeting assistance to those who likely face significant structural barriers that make loss of housing more likely. If correctly designed, adequately resourced, and informed by people most impacted, these strategies will reduce racial disparities in who experiences homelessness (sample budget available in footnoted hyperlink)

TARGET POPULATION: Groups or populations with a particularly high risk of homelessness as members of a protected class.

KEY PARTNERSHIPS: People with lived experience, Civil Legal Aid/Eviction Courts, Advocacy organizations and Non-profits primarily led by people of color and primarily serving the selected target population(s)

Not sure how your organization measures up in terms of promoting equitable practices? Check out CommunityWise Resource Centre's publication: [Anti-Racist Organizational Change: Resources & Tools for Nonprofits](#). Pages 35-43 will be especially helpful in terms of performing an organizational self-assessment; examining existing policies, hiring practices, and mission statements; as well as learning from their processes, step-by-step, with some real tangible and practical advice in creating a more inclusive organizational culture.

FOR PROGRAMMATIC/ CLIENT-LEVEL USE

SAMPLE POLICY LANGUAGE

Many of the policy samples below have already been adapted for more general use due to the CoC's broad service delivery base, however individual programs can certainly tailor the language to be more specific to better suit their needs (i.e., to specify youth, etc.). To formulate your policies, begin with relevant language from the [CoC's Non-Discrimination and Inclusion Policies](#) and add as much specificity as you need to with the suggestions provided.

REGARDING NON-DISCRIMINATION & INCLUSION

SAMPLE: "Recognizing that prejudice, discrimination and stereotyping are prevalent throughout society and dedicated to the creation of a safe, secure space for those seeking services with us, it shall be the policy of _____ to maintain and promote a facility that provides the highest quality of services to youth regardless of their actual or perceived sexual orientation and/or gender identity. Individuals receiving services at _____ shall receive fair and equal treatment, without bias, and shall be treated in a professional manner." ^{xvii}

SAMPLE: "Employees, volunteers and other individuals involved in providing services shall immediately report any evidence of discrimination, physical or sexual harassment, and verbal harassment to their supervisor." ^{xviii}

SAMPLE: "_____ is committed to providing all individuals and families served by _____ and our contracted provider agencies a safe, healthy, inclusive, affirming and discrimination-free environment." ^{xix}

SAMPLE: "We serve many types of individuals/women/youth here: individuals/women/youth of different races, religions, sexual orientations, gender expressions, and gender identities." ^{xx}

SAMPLE: "_____ empowers people to live healthy and successful lives. _____ celebrates our diversity and advocates for justice and opportunity." ^{xxi}

REGARDING GENERAL PROGRAMMING

SAMPLE: "_____ will take all reasonable steps within its control to meet the diverse needs of the individuals we serve and provide an environment in which clients are treated with respect and dignity, regardless of sexual orientation, gender identity or expression, or other protected categories." ^{xxii}

SAMPLE: "Under no circumstances is any staff member of _____ or its provider agencies to attempt to convince a transgender or gender nonconforming individual to reject or modify their gender identity or gender expression." ^{xxiii}

SAMPLE: "Staff must be able to recognize the signs of distress, support disclosure when appropriate, and follow appropriate protocols for reporting." ^{xxiv}

SAMPLE: “Staff must set a good example and make clients aware that any threats of violence, disrespectful and/or suggestive comments, or gestures toward any individual will not be tolerated. Staff also shall not engage in these behaviors.” ^{xxv}

REGARDING HOUSING AND FACILITIES

SAMPLE: “Individuals shall not automatically be housed according to their birth sex. Decisions shall be made based on individualized needs and should prioritize emotional and physical safety taking into account the individual’s perception of where they will be most secure, as well as any recommendations from the individual’s health care provider. It is most appropriate to house individuals based on their gender identity. If necessary to ensure their privacy and safety, individuals shall be provided a single room, if available.” ^{xxvi}

SAMPLE: “Decisions on housing for a transgender individual must be based on the transgender individual’s needs and must prioritize their emotional and physical safety. It is critical to include the transgender individual in the decision-making process.” ^{xxvii}

SAMPLE: “All individuals receiving services and placement have a right to safety and privacy. In instances when safety or privacy concerns are brought forth, programs and organizations must demonstrate non-discriminatory applied response. Fair and open use of a program and facilities space and features is a right of all. Any client’s discomfort with transgender and /or gender non-conforming identity is not cause for limiting the transgender or gender non- conforming person’s enjoyment and use of the facility and its features, either physically or programmatically.” ^{xxviii}

SAMPLE: “All individuals seeking services have the right to placement and services that align with their gender identity. This right is never contingent upon having received any medical treatment to physically change the body. Likewise, those who do not identify as male or female have a right to placement and services that best supports their own personal safety. No person’s placement or acceptance for service in a sex-segregated facility can be refused based upon a determination that their appearance or behavior does not conform to gender stereotypes. Facilities that legally separate participants by sex must serve all who identify with that gender, without requiring documentation.” ^{xxix}

SAMPLE: “All families, regardless of composition or gender identities within the family, have the right to placement and services in accordance with their needs, including placement in congregate facilities. Perceived non-congruence of gender identity or expression of any family member does not constitute an acceptable reason for refusal of services/placement.” ^{xxx}

SAMPLE: “Facility restrooms/bathrooms/showers and personal care areas must be open for use consistent with gender identity by all program participants. No barriers to the use and availability of restrooms/ bathrooms/showers and personal care areas can be imposed due to appearance or bodily/ physical/biological characteristics. No participant can be required to produce legal documentation of gender identity to determine appropriate use of facilities. It is a violation of the Equal Access Rule to institute specific provisions such as schedules by which transgender program participants can use bathrooms/showers and personal care areas separate from cisgender program participant.” ^{xxxi}

REGARDING LANGUAGE: Paperwork, Names, Pronouns

SAMPLE: “Employees, volunteers, and contractors, when working with clients at _____ shall use respectful language and terminology that does not further stereotypes. ^{xxxii}

SAMPLE: “Employees, volunteers, and contractors of _____, in the course of their work, shall not refer to any individual by using derogatory language in a manner that conveys bias towards or hatred of LGBT people. In particular, employees of _____ shall not imply to or tell LGBT individuals that they are abnormal, deviant, or sinful, or that they can or should change their sexual orientation or gender identity. ^{xxxiii}

SAMPLE: “Employees shall not disclose an individual’s sexual orientation or gender identity to other individuals or agencies, such as healthcare or social service providers or family and friends, without the individual’s permission, unless such disclosure is necessary to comply with state or federal law. ^{xxxiv}

SAMPLE: “All staff must clarify with clients which name and pronouns should be used in which settings—including in conversations with the young person’s family, other providers, etc. ^{xxxv}

SAMPLE: “Personnel should be aware of cultural and generational differences in language related to SOGIE, and should defer to the individual about the language they use to describe their identity, regardless of the name on the individual’s identity documents. ^{xxxvi}

SAMPLE: With respect to gender questions in Homeless Management Information System (HMIS) collection system, program participants must be given all gender response choices and have their selection recorded accordingly. ^{xxxvii}

ENCOURAGED PROGRAMMATIC PRACTICES

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination at the programmatic level. Additional examples can be found in the [CoC’s Non-Discrimination and Equity Policies](#) under the *CoC’s Commitments to Promote Inclusion and Address Discrimination*.

- Personnel are prohibited from using language that demeans, ridicules or condemns LGBT individuals. Personnel should also avoid words that convey common misconceptions about sexual orientation, gender identity and expression (SOGIE), such as referring to LGBT status as a ‘lifestyle’ or ‘preference.’ ^{xxxviii}
- Personnel should avoid making assumptions about the SOGIE of individuals or using heteronormative language – meaning language that assumes that everyone is heterosexual or that heterosexuality is preferable or superior to any other identity. An example is asking a boy, “Do you have a girlfriend?” A neutral alternative is, “Are you dating anyone?” ^{xxxix}
- Staff working with youth must identify and become familiar with community resources to support LGBTQ clients. ^{xl}

- Personnel should signal openness and acceptance through nonverbal and environmental cues. An example is displaying LGBT-affirming images, symbols or quotations, such as the equal sign or rainbow flag.^{xli}
- Include magazines and materials in your waiting room which promote inclusion (i.e.,LGBTQ-affirming, representation of minority populations). Where possible, employees shall display materials, such as “safe zone” or “hate-free zone” posters that convey to youth that the facility maintains an inclusive, affirming environment.
- Employees should model positive behavior when interacting with clients.^{xlii} A great way to show LGBTQ individuals and others that your organization will be respectful of them is to model the respectful use of names and pronouns. Have staff wear name tags/use business cards with pronouns. When staff introduce themselves to young people, ask them to say their names and pronouns. For example: “Hi, my name is Aaron! I use the pronouns he, him, his and they, them, theirs.”^{xliii}
- Ask as few questions as possible that might be seen as invasive. For example, sex at birth may not need to be known, in which case it can be omitted from the form. However, if you ask questions about a person’s sex, you should also ask about their gender identity.^{xliv}
- Adapt intake form to include: committed partner relationship status, and non-binary gender identity, intersex, transgender MtoF, FtoM options^{xlv}

WORDING TEMPLATES

Following are two examples of how information can be collected in a way which lets the participant know that staff are taking their preferences into account.

NAME^{xlvi}

Legal Name*: _____ Chosen Name: _____

*Although we will only ever refer to you using the name you use, we are required for insurance purposes to collect your legal name (if applicable).

PRONOUNS/CONTACT INFO^{xlvii}

Home phone: _____ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? _____

Work phone: _____ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? _____

Cell phone: _____ Is it ok to leave a message/voicemail at this number? Y/N

What name and pronouns should we use when calling this number? _____

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ii Race Forward: The Center for Racial Justice Innovations

iii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

iv Funders Together to End Homelessness: [Commitment to Racial Equity](#)

v Opening Doors Fairfield County (ODFC) CoC’s Statement on Equity

vi Funders Together to End Homelessness: [Commitment to Racial Equity](#)

vii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

viii The School District of Philadelphia: Office of Strategic Partnerships (2020) Racial Equity Guidance

ix Funders Together to End Homelessness: [Commitment to Racial Equity](#)

x Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xi Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xiii Funders Together to End Homelessness: [Commitment to Racial Equity](#)

xiv CommunityWise Resource Centre (2017) [Anti-Racist Organizational Change: Resources & Tools for Nonprofits](#)

xv Annie. E. Casey Foundation (2014) [Race Equity and Inclusion Action Guide](#)

xvi HUD Exchange, Training (2020) [Targeting Homeless Prevention in the Midst of Covid-19](#)

xvii Adapted from Virginia Anti Violence Project

xviii Virginia Anti Violence Project

xix Adapted from NYC Administration for Children Services

xx Adapted from True Colors Fund

xxi Adapted from True Colors Fund

xxii Adapted from National Center for Lesbian Rights

xxiii Adapted from NYC Administration for Children Services

xxiv NYC Administration for Children Services

xxv Adapted from NYC Administration for Children Services

xxvi Adapted from the National Center for Lesbian Rights

xxvii Adapted from NYC Administration for Children Services

xxviii Philadelphia CoC’s Non-discrimination Policy

xxix Philadelphia CoC’s Non-discrimination Policy

xxx Philadelphia CoC’s Non-discrimination Policy

xxxi Philadelphia CoC’s Non-discrimination Policy

xxxii Adapted from National Center for Lesbian Rights

xxxiii National Center for Lesbian Rights

xxxiv Adapted from National Center for Lesbian Rights

xxxv NYC Administration for Children Services

xxxvi Adapted from National Center for Lesbian Rights

xxxvii Philadelphia CoC’s Non-discrimination Policy

xxxviii Adapted from National Center for Lesbian Rights

xxxix Adapted from National Center for Lesbian Rights

xl NYC Administration for Children Services

xli Adapted from the National Center for Lesbian Rights

xlii Adapted from the National Center for Lesbian Rights

xliiii True Colors Fund, [Inclusive Paperwork Guidance](#)

xliiv True Colors Fund, [Inclusive Paperwork Guidance](#)

xlv Bradbury-Sullivan LGBT Community Center Training Institute

xlvi Adapted from True Colors Fund, [Inclusive Paperwork Guidance](#)

xlvii True Colors Fund, [Inclusive Paperwork Guidance](#)