

Entry Point Inclusion / Non-discrimination Policy

Discrimination: Suburban Cook County Coordinated Entry (Entry Point) and its agencies do not discriminate in the course of assessment, matching, and referral for housing and other services on the sole basis of anyone's:

- Gender, gender status, or gender expression
- Being LGBTQ+
- Race, color, tribe, or ethnicity
- Immigration, refugee, or citizenship status
- Income level, or source of income
- Ability to read, write, or speak English
- Job status or education level
- Alcohol or drug use or addiction, or other addictions
- Health or mental health status, or having HIV or AIDS
- Age
- Marital, family, or partnership status
- Legal history
- Veteran or military discharge status
- Body size
- Participation in the street economy
- Religion or personal philosophy
- Not following a doctor's or therapist's medical treatment suggestions
- Physical, developmental, intellectual, or emotional ability

We seek to serve those who have been marginalized or previously rendered service-ineligible for these or any other reasons. Therefore, we do not tolerate any speech, language, or behavior that is abusive or demoralizing to anyone who might participate in our services. We expect staff, interns, and volunteers to be vigilant in enforcing this standard.

Some programs may be required to prioritize enrollment based on regulations imposed by their funding sources and/or state or federal law. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. Some programs are dedicated to veterans, youth, or survivors of domestic violence, etc. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

All aspects of Entry Point will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any particular housing facility or

neighborhood based on their race, color, national origin, religion, sex or gender identity, sexual orientation, disability, or the presence of children.

¹ In the case that a client presents at an access point who is the subject of a Protective Order held by another client also being served at that access point, Entry Point will prioritize right of service at that location to the client holding the order. The client prohibited from proximity or contact will be referred to another Entry Point access point for assessment and/or service. If, during the course of housing matching and referral, it comes to the attention of the Entry Point Lead Team that a client has experienced abuse by their partner who would otherwise be housed together with them, the wishes of the abuse survivor regarding cohabitation will be honored. If a perpetrator of abuse cannot then be housed with their partner, they will be housed separately as an individual.

The Entry Point Lead Agency conducts quarterly rotating training of staff on Coordinated Entry basic training, this Anti-Discrimination Policy and procedures, and on a wide array of cultural competency topics.

This Inclusion and Non-Discrimination policy pertains specifically to the client assessment, matching and referral processes, but it is assumed that each agency maintains an Inclusion and Non-Discrimination policy regarding their services and programs that substantially and materially echoes this policy, and this policy is not intended to circumvent or exempt an agency's own policies.

Discrimination Complaint Process: Participants will be shown / read the Inclusion and Non-Discrimination policy as part of the standard assessment, and will sign to indicate that they have had it presented. The policy will also be posted in a visible location at all access points. The policy page will inform participants of their right to file a verbal or written Discrimination Complaint, and will contain all information needed to file the complaint.

When a Discrimination Complaint about the Entry Point process is received in verbal or written form, the Entry Point Lead Agency will complete an investigation of the complaint within 30 calendar days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge about the circumstances surrounding the complaint, and by collecting any documents that are likely to be relevant to the investigation. If a complaint is determined to pertain to matters outside the realm of assessment, prioritization, matching and/or referral, but is related to housing, shelter or other services of a particular agency or program, or involved complaint of mistreatment or discriminatory behavior between clients, grievances will be directed back to the appropriate agency for resolution. Within 30 days after concluding the investigation, the Entry Point Lead Agency will write a report of the investigation's findings, including a proposed decision about whether inappropriate discrimination occurred, and any action(s) recommended to prevent discrimination from occurring in the future. The findings of the investigation will be shared with the Entry Point Committee at the next scheduled meeting to finalize the decision, and will thereafter be shared with the client as soon as practicable. If necessary, the Entry Point Lead Agency may recommend that the client be re-assessed or re-prioritized for housing or services. The report will be retained on file at the Alliance to End Homelessness in Suburban Cook County (Alliance) for two years. If the complainant or other parties continue to dispute the conclusion of the investigation and wish to appeal the decision, they may file an appeal through the Alliance with the Entry Point Committee within 30 calendar days after notice of the Entry Point Lead Team's determination. The Entry Point Committee will address the complaint appeal within 30 calendar days of its receipt by reviewing all relevant materials, notes and reports from the Entry Point Lead Team's investigation, and within 30 calendar days, will notify all parties of their disposition, which will be considered final.

Discrimination complaints can also be directed to the Department of Housing and Urban Development: Chicago Regional Office: (800) 765-9372; or online at: https://www.portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/online-complaint

Equal Access and Inclusion Regardless of Family Composition: Clients' designation of their familial relationships will be honored and respected, regardless of marital status, gender identity or expression, sexual or romantic orientation, age, disability, proof of legal guardianship, or any other feature of identity or circumstance. Family members will not be denied access or separated based upon these reasons, and will be accommodated together, when possible, within space limits of available shelter or housing stock.

Equal Access and Inclusion of Transgender (“trans*”) and Gender Non-conforming Clients: In accordance with federal guidelines and pursuant to standard best practices, we recognize that trans* and gender non-conforming clients are among the most vulnerable who will enter our service spaces and programs. We respect the gender self-identification of all of our clients, use people’s preferred names and pronouns, and invite trans* clients to consider and indicate what would be the safest arrangement for them for sleeping quarters and bathroom use. We do not consider gender markers on people’s IDs, people’s appearance, the gender assigned to someone at birth, or anything other than or over the person’s self-identity. (In other words, regardless of how a client’s gender features are read by staff or others or what her ID might say, if the client identifies as female, she may use the women’s bathroom and shower and sleep in the women’s section if she feels that is safest for her.) We do not ask intrusive questions about a clients’ anatomy or medical business, or seek “proof” of anyone’s gender status, and do not allow gossip or speculation about these things. We do not single out trans* clients for different treatment, but consider their comfort and safety to be paramount above the comfort level of cisgender (non-trans) clients, staff and volunteers. If a client feels more privacy is needed, we discreetly provide individual private shower or bathroom time for the client as much as possible. We do not, however, prescribe or demand more privacy or modesty from trans* clients than from their cisgender peers.

Access for people with disabilities: Appropriate auxiliary aids and services will be available for individuals with disabilities to ensure effective communication. The Suburban Cook Call Center has a TDD number, and each agency will utilize a TDD service as necessary to serve people who are Deaf or hard of hearing. Large type (and ability to enlarge text) versions of documents will be made available for people with visual impairments. Picture communication cards are available for those who are non-verbal. Staff will offer to assist clients in reading any forms, policies or written correspondence, and will offer to write on forms as needed.

Entry Point will ensure that individuals with disabilities, including individuals who use wheelchairs are able to access the Entry Point Assessment process by providing ADA accessible Access Points or arranging reasonable accommodations for mobility-impaired individuals such as assigning a Street Outreach worker or Housing Navigator to provide mobile assessment services. Marketing materials will clearly convey ADA accessible Access Points and processes.

Access for clients with limited English language literacy or proficiency: Forms and policies are to be made available in Spanish. Translation services are secured when needed to communicate with anyone whose primary language cannot be engaged by staff. Entry Point will take reasonable steps to offer process materials and participant instructions in multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency. Staff will offer to assist clients in reading any forms, policies or written correspondence, and will offer to write on forms as needed. The Inclusion and Non-Discrimination Policy and all other important policies and forms will be screened for literacy level using widely accepted best practices.

Cultural and Linguistic Competence: Staff use identity language chosen by clients, and do not select identity descriptors for clients during assessment. Assessments use culturally and linguistically competent questions for all persons that reduce cultural or linguistic barriers to housing and services for special populations, including LGBTQI people and families, youth, immigrants or refugees, devotees of minority religions, etc.