



NON DISCRIMINATION AND INVOLUNTARY FAMILY SEPARATION POLICY GUIDANCE

Background

The Grand Rapids Area Coalition to End Homelessness, also known as the Grand Rapids/Wyoming/Kent County Continuum of Care entity and here forward referenced as the CoC, is committed to ending homelessness across Kent County.

In its approach to ending homelessness, the CoC is committed to treating all individuals and families with dignity and respect. The following sections, non-discrimination in service and involuntary family separation outline ways in which CoC member agencies can ensure any person seeking services is treated fairly and respectfully.

Applicability

The US Department of Housing and Urban Development (HUD) through the HEARTH Act, in section 578.93 Fair Housing and Equal Opportunity, outlines specifications with which housing projects funded through the HEARTH Act must in be compliance. Projects receiving HEARTH funding must comply with these specifications.

All Continuum of Care member agencies are encouraged to be in compliance with these best practices. Wherein the CoC does not have services adequate to prevent family separation or discrimination, the CoC shall work to secure these services to best meet the needs of individuals and families.

Non-Discrimination in Service

Federal guidance in the *Rule FR-5359 Equal Access to Housing in HUD Programs—Regardless of Sexual Orientation or Gender Identity* defines family as follows:

Family: A group of persons residing together, and such group includes, but is not limited to:

- A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
- An elderly family;
- A near-elderly family;
- A disabled family;
- A displaced family; and,
- The remaining member of a tenant family.

To comply with Rule FR-5359, a project shall not discriminate based on family composition.

Involuntary Family Separation

Within Section 578.93.e is the *Prohibition Against Involuntary Family Separation*. This prohibition states that the age and gender of a child under age 18 must not be used as a basis for denying any family's admission into a housing project. (See also Section 404 of the HEARTH Act)