

# ST. CLAIR HOUSING COMMISSION EQUAL HOUSING OPPORTUNITY/FAIR HOUSING POLICY CIVIL RIGHTS COMPLIANCE

This policy has been incorporated by reference into the Public Housing Admissions and Continued Occupancy as well as the Section 8 Administrative Plan.

## NONDISCRIMINATION

It is the policy of the Commission to fully comply with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and any legislation protecting the individual rights of residents, applicants or staff which may be subsequently enacted.

The St. Clair Housing Commission follows Michigan Law in that it prohibits discrimination in employment, education, housing, public accommodation, law enforcement, or public service based on religion, race, color, national origin, age, sex, marital status, height, weight, arrest record, sexual orientation and/or gender identity, or handicap.

No inquires shall be made about a person's sexual orientation or gender identity. However, the St. Clair Housing Commission may inquire about a person's sex in order to determine the number of bedrooms a household may be eligible for under the occupancy/subsidy standards or to accurately complete HUDs 50058.

The Commission shall not discriminate because of race, color, sex, religion, familial status (in non-elderly designated housing), disability, handicap, age, marital status, height, weight, arrest record, sexual orientation and/or gender identity, or national origin in the leasing, rental, or other disposition of housing or related facilities, including land, included in any development under its jurisdiction.

The Commission shall not take any of the following actions on account of race, color, sex, religion, familial status, disability, handicap, age, marital status, height, weight, arrest record, sexual orientation and/or gender identity, or national origin:

1. Deny to any family the opportunity to apply for housing or deny to any eligible applicant the opportunity to lease housing suitable to its needs.
2. Provide housing which is different than that provided other.
3. Subject a person to segregation or disparate treatment.
4. Restrict a person's access to any benefit enjoyed by others in connection with any program operated by the Commission.

5. Treat a person differently in determining eligibility or other requirements for admission.
6. Deny a person access to the same level of services.
7. Deny a person the opportunity to participate in a planning or advisory group which is an integral part of the public housing or tenant-based housing programs.

The Commission shall not automatically deny admission to a particular group or category of otherwise eligible applicant (e.g., families with children born to unmarried parents or elderly pet owners). Each applicant in a particular group or category will be treated on an individual basis in the normal processing routine.

The Commission will seek to identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504 of the Rehabilitation Act of 1973, the Commission will make such physical or procedural changes as will reasonably accommodate people with disabilities.

The Commission records with respect to applications for admission shall indicate for each application the date of receipt; the determination of eligibility or non-eligibility; the preference rating, if any; and the date, location, identification and circumstances of each vacancy offered and whether that vacancy was accepted or rejected.

## FAIR HOUSING

It is the policy of the St. Clair Housing Commission to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. The St. Clair Housing Commission shall affirmatively further fair housing in the administration of its public housing program.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, sexual orientation and/or gender identity, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the St. Clair Housing Commission's programs.

To further its commitment to full compliance with applicable Civil Rights laws, the St. Clair Housing Commission will provide Federal/State/local information to applicants/tenants of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of

discrimination. Such information will be made available with the applications, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the St. Clair Housing Commission office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The St. Clair Housing Commission will assist any family that believes they have suffered illegal discrimination by providing them copies of the appropriate housing discrimination forms. The St. Clair Housing Commission will also assist them in completing the forms if requested, and will provide them with the address of the nearest HUD office of Fair Housing and Equal Opportunity.

## AFFIRMATIVE MARKETING

As conditions may be required, the Commission will post notices of housing availability in particular cities to encourage fuller participation. The Commission may issue public announcements of availability to encourage applications for assistance. Among the marketing efforts the commission may engage in depending on the situation are the following:

1. Send informational spots to local media outlets such as radio stations, cable TV, newspapers, or other periodicals for broadcast or publication;
2. Special outreaches to minorities, persons with disabilities and very low-income families;
3. Distribute pamphlets and brochures.
4. Post notices in places of employment, unemployment offices, welfare offices, post offices, grocery stores, churches, community halls. Buses and other public transportation centers;
5. Outreach to organizations which assist people with disabilities, the elderly, students, immigrants, homeless people and victims of domestic violence.

The Commission will monitor the benefits received, as a result of the above activities, and will increase or decrease the outreach activities accordingly.

To reach minority groups, it may be necessary to canvas neighbors or make mass mailings to areas with a heavy concentration of minority citizens. If language is a problem, brochures may be printed in Spanish, or other languages as required.

## OPERATIONS

Title: Equal Housing-Fair Housing-Civil Rights Compliance Policy  
Introduced: 03-15-2022  
Adopted: 07-01-2022  
Res. No.: 2022-06

In order to further the objectives of nondiscrimination the Commission shall:

1. Include in the admissions briefing for all Commission programs a section on compliance Civil Rights laws. The briefing shall carefully explain to all participants what should be done if they believe they have been discriminated against.
2. Prominently display a Fair Housing Poster and Civil Rights Poster in every development Community Building owned by the Commission and in the Main Office and in every location where employees report to work.
3. Use the Equal Housing Opportunity logo and/or statement in all advertising and in all marketing publications of the Commission. The Commission shall be particularly conscious of human models used in its publications so as to avoid signaling any sense of discrimination.
4. The Commission shall maintain a TDD Machine or an acceptable alternative for the use of the hearing impaired the Management Main Office.
5. As many publications as feasible shall be printed in both English and Spanish or any other language commonly spoken in the locality.

## DESIGNATION OF PERSON IN CHARGE OF COMPLIANCE

1. The Executive Director of the St. Clair Housing Commission is designated as the person in charge of overseeing that the Civil Rights Compliance and Equal Housing Opportunity policies are adhered to at all times.

Human resource employee is designated as the person in charge to maintain all required and up-to-date postings with regard to these policies.

## COMPLAINTS TO SCHC

Upon receipt of a complaint from an applicant or participant alleging a violation, the SCHC will determine if a program violation occurred and implement appropriate corrective action(s) if necessary. The SCHC may seek assistance from the HUD Field Office of Public Housing in order to make this determination. In all cases the SCHC may advise the family to file a fair housing complaint if the family feels they have been discriminated against under the Fair Housing Act.

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The SCHC will provide written notice of receipt of the complaint to those alleged to have violated and the complainant will be informed that this notice was made. Following an investigation of the allegations, the SCHC will provide the complainant and those alleged to have violated with findings from the investigation and either a proposed corrective action to resolve any violation or an explanation as to why corrective action is not warranted.

The SCHC will keep records of all complaints, investigations, notices and corrective actions for the length of time consistent with its current record-keeping obligations.