

VT-500 BoS CoC Policy on Family Composition and Equal Access to Housing

In accordance with HUD's Equal Access Rule, a recipient or subrecipient receiving funds under the ESG or CoC Programs cannot discriminate against;

- a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults);
- the age of any members of the family;
- the disability status of any member of the family;
- marital status;
- actual or perceived sexual orientation, or gender identity; or
- a child who is temporarily away from the home because of placement in foster care, up to the moment of officially terminating parental rights, is also considered a member of the family.

Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served as such. For example, an emergency shelter, transitional housing project, or permanent housing projects that serve families with children, may not limit assistance to only women with children. Further, the age or gender of a child under age 18 must not be used as a basis for denying any family's admission to a CoC funded project.

Under HUD's Equal Access rule, the aforementioned projects must serve the following family types:

- Single female head of households with minor child(ren);
- Single male head of household with minor child(ren); and
- Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

Two adults presenting together as a family will not be required to provide proof of marriage to enroll in ESG and CoC funded projects. This policy applies to any recipients or sub-recipients of funding under ESG or the CoC program, including faith-based organizations.

Complaints related to involuntary family separation may be reported to the CoC Program Director at mshimko@hhav.org and may also be submitted to HUD's Office of Fair Housing by either submitting an online form at <https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action> or calling 1-800-669-9777. Complaints may also be directed to the State of VT Human Rights Commission at <https://hrc.vermont.gov/how-to-file>.