



## Equal Access Rule Policy

The Community Action Center (CAC) aims to ensure HUD-funded housing and emergency shelter programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. Effective in October 2022, in accordance to HUD's established 24 CFR Part 5 Equal Access Rule regarding Gender Identity in Community Planning and Development Programs, CAC will adopt the following policies:

- The Equal Access Notice from HUD will be posted publicly in all offices and throughout CAC.
- CAC's housing and emergency shelter programs are inclusive. Therefore, it does not have policies that involve special accommodations related to gender.
- Participants and potential participants will be offered a private space to complete intake paperwork and data collection.
- In alignment with person-centered practices, participants will not be asked to provide anatomical information or documentation (physical or medical) of their gender identity.
- Participants will self-report their gender identity, and their answers will be reflected in intake paperwork and other agency documentation.
- CAC will keep a participant's transgender status confidential and ensure only the essential staff, identified by administrators, are told about a participant's transgender status unless the participant gives permission otherwise.
- CAC is committed to and complies with federal, state, and local privacy laws.



## Community Action Center

- CAC has a grievance procedure to address complaints. This includes CAC's internal grievance procedure, filing a complaint with HUD, or seeking services with Southern Minnesota Regional Legal Services.
- CAC has a procedure to correct misinformation or inaccurate ideas about the supposed threat that transgender participants pose to the health or safety of other participants solely based on their non-conforming gender expression.
- CAC has identified harassment as a range of behaviors that are experienced as offensive, aggressive, or intimidating regardless of physical location or proximity to the project. For LGBTQ clients, this can include: consistently or maliciously refusing to use the participant's preferred name or affirmed gender pronoun, asking any questions about a participant's body or appearance, disclosing that a client is transgender or gender non-conforming, or physical intimidation.