



## Metro West Housing Solutions Anti-Discrimination Policy

Metro West Housing Solutions is committed to providing high quality, safe, affordable and sustainable housing and services to thousands of people in metro Denver that earn a range of incomes and embody the community's strengths, culture and diversity.

### Scope:

This policy applies to all employees, volunteers, contractors, clients, and visitors of Metro West Housing Solutions, regardless of their position or status within the organization.

### Notice of Anti-Discrimination:

Metro West Housing Solutions prohibits discrimination, harassment, retaliation, and intimidation based on race, color, religion, sex, national origin, age, marital status, disability, or any other characteristic protected by law. This includes, but is not limited to, discrimination, harassment, intimidation or retaliation in hiring, compensation, promotion, termination, and all other aspects of employment or participation in organizational activities.

This policy is based on rights protected by 40 C.F.R Parts 5 and 7 (Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including:

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d *et seq.*, 40 C.F.R. Part 7; Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 *et seq.*, 40 C.F.R. Part 5; Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794, 40 C.F.R. Part 7; the Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 *et seq.*, 40 C.F.R. Part 7, Subpart F, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500 § 13, 86 Stat. 903 (codified as amended at 33 U.S.C. § 1251 *et seq.* (1972)), 40 C.F.R. Part 7.

### Prohibited Conduct:

- Making derogatory or offensive remarks, jokes, or gestures related to a person's protected characteristic.
- Displaying or distributing materials that promote stereotypes or prejudices.
- Denying opportunities for advancement or participation based on a person's protected characteristic.
- Engaging in retaliation against any individual who reports discrimination or harassment or participates in an investigation of such complaints.
- Engaging in other discriminatory acts through program activities.

#### Responsibilities:

- Metro West Housing Solutions Management: Management is responsible for promoting a culture of diversity and inclusion, enforcing this policy, and taking appropriate action in response to reports of discrimination or harassment.
- Employees: All employees are expected to treat others with respect and refrain from engaging in discriminatory or harassing behavior.

#### Notice of Policy:

Metro West Housing Solutions will prominently display this anti-discrimination policy notice in all relevant locations, including but not limited to offices, websites, and program materials.

Procedure: This non-discrimination policy will be posted in the organization office (if applicable), on the website (under the Policy Statements section), and distributed to the public as part of general organizational information.

#### Designated Non-Discrimination Coordinator:

Metro West Housing Solutions will designate an individual to serve as the Non-Discrimination Coordinator responsible for overseeing compliance with anti-discrimination laws and addressing any complaints or concerns related to discrimination or accessibility.

Procedure: The Non-Discrimination Coordinator (as of 1/09/2025) is Brendalee Connors, Chief Real Estate Officer, who can be contacted at [fairhousing@mwhs.org](mailto:fairhousing@mwhs.org) or 303-987-7580.

#### Reporting a Grievance:

Any staff person or volunteer who believes they have been subjected to discrimination or harassment, or who has witnessed such behavior, should report it according to the MWHS Employee Handbook. If a member of the public or attendee of an event believes they have been subjected to discrimination or harassment, they should report it to the Non-

Discrimination Coordinator. Filing a grievance should be carried out in writing to the Non-Discrimination Coordinator, who will take necessary steps to remedy the situation and circumstances to assure the prompt and fair resolution of complaints.

Procedure: The complaint shall be in writing and contain information about the complainant and the alleged discrimination such as:

1. The name, address, and phone number of complainant;
2. The location, date, and description of the alleged violation; and
3. The signature of the complainant or his or her designee.

If the complainant is unable to submit the complaint in writing, they may call the Non-Discrimination Coordinator to submit a verbal complaint. The complaint shall be submitted by the complainant or his or her designee as soon as possible but no later than 180 calendar days after the alleged violation to:

Brendalee Connors, Chief Real Estate Officer  
Non-Discrimination Coordinator  
575 Union Boulevard, Suite 100  
Lakewood, CO 80228  
fairhousing@mwhs.org/303-987-7580

#### Investigation and Resolution:

Metro West Housing Solutions will promptly and thoroughly investigate all reports of discrimination or harassment. Investigations will be conducted in a fair and impartial manner, and appropriate corrective action will be taken against individuals found to have violated this policy. Confidentiality will be maintained to the extent possible, consistent with the need to conduct a thorough investigation.

Procedure: Within 10 calendar days after receipt of the complaint, the Non-Discrimination Coordinator will make a determination of whether Metro West Housing Solutions has jurisdiction over the complaint and send the complainant an acknowledgment letter informing them whether the complaint will be investigated. This letter will also inform the complainant of their right to file directly with the appropriate federal agency. An investigation of the complaint may include interviews of the complainant, employees, contractors, subcontractors, subgrantees, and witnesses to the alleged discrimination, as well as review of any physical or written evidence.

The Non-Discrimination Coordinator may attempt to conciliate and resolve the complaint through a mutually agreeable solution. Any such informal resolution must be signed by both the Non-Discrimination Coordinator and the complainant. Absent extenuating circumstances, the Non-Discrimination Coordinator will complete their investigation and resolution efforts within 30 days after beginning the investigation.

An appropriate, prompt, and impartial investigation of any allegations filed under federal non-discrimination statutes will be conducted. A preponderance of the evidence standard will be applied during the analysis of the complaint.

When the Non-Discrimination Coordinator determines that discrimination has occurred, and an informal resolution is not reached, they shall determine any necessary remedial actions.

Absent extenuating circumstances, the Non-Discrimination Coordinator will provide a written response to the complaint within 45 calendar days after beginning the investigation. The Coordinator will issue one of three letters:

1. A closure letter summarizing the allegations and stating that there was not a violation and that the case will be closed; or
2. A letter of resolution summarizing the allegations and describing the informal resolution mutually agreed to by the complainant and Metro West Housing Solutions about which the complaint was submitted; or
3. A letter of finding ("LOF") summarizing the allegations and the investigation of the alleged complaint and explaining any remedial action to be taken by Metro West Housing Solutions.

If the complainant wishes to appeal the decision, they have ten (10) days after the date of the closure letter or the LOF to do so. A written appeal would be sent to the Metro West Housing Solutions Chief Executive Officer at 575 Union Boulevard, Suite 100, Lakewood, CO 80228.

If at any time a delay is expected, the Non-Discrimination Coordinator will notify the complainant in writing of the reasons(s) for the delay and the expected date for a response.

The Non-Discrimination Coordinator shall maintain records of complaints received, informal resolutions, investigation findings, appeals, and appeal decisions. The Non-

Discrimination Coordinator shall document actions taken to resolve each complaint, communicate complaint activity to the appropriate federal agency as required, and maintain copies of complaints and documentation of their resolution for a period of not less than two (2) years.

#### Data Collection:

Metro West Housing Solutions will maintain demographic data on the race, color, national origin, sex, age, or disability status of the population it serves, where required for Federal contract reporting purposes and in compliance with applicable laws and regulations. If demographic information is required, it will be utilized to understand the special communication and participation needs of the community being engaged to ensure public involvement is available to all persons regardless of race, color, national origin, disability, age, sex, or prior exercise of rights or opposition to actions protected under federal non-discrimination laws. Demographic classifications set forth in CFR 7.25 will be used for categorization. All demographic data collected for federal grants will be maintained for at least (3) three years after grant close out.

Procedure: Metro West Housing Solutions' will request demographic data from applicants and document responses in Yardi.

#### Accessibility:

Metro West Housing Solutions will make reasonable accommodations to ensure that individuals with impaired vision or hearing or limited English proficiency can participate fully in our program activities. This includes providing auxiliary aids and services as needed at no cost to the individual.

Procedure:

#### Virtual Activities:

This notice will be included on registration information for virtual events.

If you are a person with a disability or limited English proficiency and want to request special accommodations to participate in a Metro West Housing Solutions virtual activity, please contact Brendalee Connors, Chief Real Estate Officer at [fairhousing@mwhs.org](mailto:fairhousing@mwhs.org) or 303-987-7580 during business hours of 9 a.m. to 4 p.m. to discuss reasonable accommodations five days prior to the event.

For activities that are virtual Metro West Housing Solutions will incorporate real-time captioning or transcription services for those with hearing impairments.

#### In-Person Events:

This notification will be included on registration information for in-person events.

If you are a person with a disability or limited English proficiency and desire any assistive devices, services, or other accommodations to participate in a Metro West Housing Solutions activity, please contact Brendalee Connors, Chief Real Estate Officer at [fairhousing.org](http://fairhousing.org) or 303-987-7580 during business hours of 9 a.m. to 4 p.m. to discuss reasonable accommodations five days prior to the event.

Metro West Housing Solutions will ensure that the location of public meetings will include accessibility for individuals with physical disabilities and will consider access to public transportation when making decisions about event location. For in-person activities providing food, we will provide the means for individuals to indicate allergy/special needs on our registration forms and provide reasonable accommodations. We will provide, if necessary, reasonable accommodations for individuals who are deaf or hard of hearing and to other individuals who need additional assistance for effective communication and participation.

#### Language Access:

Metro West Housing Solutions will provide reasonable accommodations to assure meaningful access to services for persons with limited English proficiency. This includes providing translation and interpretation services as needed to ensure effective communication at no cost to the individual.

Procedure: We will provide, if necessary, reasonable accommodations for limited English proficient participants, including on-site translator services, to ensure effective communication and participation.

#### Non-Retaliation or Intimidation:

Retaliation or intimidation against any individual who reports discrimination or harassment, participates in an investigation, or otherwise opposes discriminatory practices is strictly prohibited and will result in disciplinary action, up to and including termination of employment or participation in organizational activities.

#### Training and Education:

Metro West Housing Solutions will provide periodic training and education to employees, volunteers, and contractors on the principles of equal opportunity, diversity, and inclusion, as well as the procedures for reporting and addressing discrimination and harassment.

**Review and Revision:**

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.