# STOCKBRIDGE HOUSING AUTHORITY

# EQUAL OPPORTUNITY, AFFIRMATIVE ACTION and FAIR HOUSING PLAN

### I. Purpose

The purpose of this plan is to promote equality of opportunity and to prevent discrimination based on race, creed, color, gender, **gender identification**, sexual orientation, handicap, or national origin in all aspects of the Stockbridge Housing Authority programs, activities, and employment practices. The plan contains both Policies and Procedures.

### II. Equal Opportunity/Affirmative Action Policy

The Stockbridge Housing Authority (hereafter referred to as the Authority) promotes equal opportunity for all and does not discriminate against any employee, tenant, or applicant for employment or tenancy because of race, creed, color, gender, **gender identification**, sexual orientation, handicap, or national origin. Procedures to ensure compliance with this Policy address the following: employment, compensation, and benefits; tenant selection, unit assignment and occupancy standards.

The Authority names the Executive Director as its Equal Opportunity Officer, with responsibility for implementing this Policy and Procedures.

## III. Implementation Procedures

- A. Employment (Also, see Personnel Policies)
  - 1. The phrase "Equal Opportunity/Affirmative Action Employer" is used in recruiting, employment publications, and all other advertisements.
  - 2. All recruitment sources are advised in writing of the Authority's commitment to equal opportunity.
  - 3. The advertisement will be posted at least once in newspapers, such as the Berkshire Eagle, or other papers that serve the county's metropolitan area.
  - 4. When the Authority participates in work/study programs or internship programs, the equal opportunity employment goals are clearly stated.
  - 5. All employment applicants are treated equally in the application process and are given assistance as necessary, including assistance necessitated by language barriers.
  - 6. Specific goals for minority representation in each employment category are impossible to establish due to the small number of employees in each category, (2 maintenance; 1 clerical; 1 professional and 1 or more resident services coordinators) and the area's low concentration of

- minorities (1.9 % minority from the 2014-2019 American Community Survey US Census Bureau; 1.15% Vietnam Vet; 4.54% Disabled, per 1990 Census)
- 7. If there are no current employees representing minority, Vietnam Vet, or disabled categories, every effort is made to hire a qualified candidate from one of these categories for the next available opening.
- 8. All employees are treated equally, in compliance with the requirements of the specific position and the Personnel Policies.

#### B. Compensation

1. All employees compensated appropriately according to the Personnel Polices without regard to race, creed, color, gender, **gender identification**, sexual orientation, handicap, or national origin.

#### C. Benefits

- All employees are granted benefits appropriately according to the Personnel Policies without regard to race, creed, color, gender, gender identification, sexual orientation, handicap or national origin.
- 2. Employees may use Personal Leave to celebrate special religious or ethnic/cultural observances.

#### D. Tenant Selection

- 1. When and if a decline in the waiting list necessitates marketing strategies all such efforts reflect the equal opportunity and affirmative action plan.

  All advertisements carry the phrase, "Equal Housing Opportunity" and are published in the Berkshire Eagle or other papers that serve the county's metropolitan area.
- 2. In order to maintain equality of opportunity, rigorous attention is given to the Eligibility and Selection Criteria, as defined in 760 CMR 5.00. When and if the percentage of units occupied by disabled persons falls below 13.5%, or seven (7) units, then one eligible and qualified disabled household is placed for each eligible and qualified elderly household placed, until such time that the number of handicapped households equals seven.
- 3. In order to maintain affirmative action and equality of opportunity, the Authority establishes a goal of 1.9% (as consistent with the newly released guidance PHN 2021-05 and data received from the 2014-2019 American Community Survey US Census Bureau) OR at least one (1) unit for a member of a minority. The affirmative action preference precedes all other preferences until such time that the goal is achieved.

The affirmative action preference does not limit the placement of a minority household which would otherwise be due to the next unit offer.

### E. Unit Assignment

 Units are assigned as they become available, without regard to race, creed, color, gender, gender identification, sexual orientation, handicap, age or national origin.

#### F. Occupancy Standards

1. All occupancy standards in accordance with 760 CMR 6.00 are applied equally to all, without regard to race, creed, color, gender, **gender identification**, sexual orientation, handicap, age or national origin.

Adopted by the Board of Commissioners July 6, 2021.

Renamed by the BOC January 11, 2022.