

Equal Opportunity /Affirmative Action/ Fair Housing (EO/AA/FH) Policy

January 25, 2006

The Public Housing Agency of the City of Saint Paul (PHA) recognizes the essential right of all persons to be treated equally and with dignity and respect. The PHA will not discriminate against or condone harassment because of race, creed, religion, color, gender, sexual or affectional orientation, national or ethnic origin or ancestry, age, the presence or perception of any physical, mental or sensory disability, use of a trained guide dog or service animal, marital status, citizenship status, familial status or status with regard to public assistance. The PHA will strive to ensure that all of its employment, housing and business practices are free from discrimination based on these protected status factors.

Through this policy statement the PHA affirms its commitment to provide equal opportunity and fairness to all employees, applicants for employment, residents, Section 8 Housing Choice Voucher Program (HCV) participants, applicants for public housing and Section 8 HCV, vendors and contractors in accordance with all applicable EO/AA/FH laws, directives and regulations of federal, state and local governing bodies and related agencies.

Employees and Applicants for Employment. The PHA acknowledges the right of all employees and applicants for employment to be treated fairly and equally, based on merit and ability, and free from discrimination including, but not limited to, the following employment practices:

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|---------------------|-----------------------------|
| recruitment | hiring |
| training | compensation |
| promotion | demotion |
| transfer | layoff |
| disciplinary action | termination |
| rates of pay | other forms of compensation |

The PHA's commitment to a diversified work force is exemplified by the active recruitment of all individuals including women, minorities, persons with disabilities and residents of public housing. In addition, the PHA evaluates the performance of its management and supervisory personnel on their efforts in achieving its EO/AA objectives, and this factor is included in their performance appraisals. Any PHA employee who does not comply with PHA's EO/AA/FH Policy and the Discrimination and Harassment Policy and Procedures will be subject to disciplinary action.

Residents and Applicants for Public Housing. The PHA acknowledges the right of all PHA residents, Section 8 HCV participants, applicants for public housing and Section 8 HCV to be treated fairly and equally and free from discrimination including, but not limited to, the following housing practices:

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|------------------------|--------------------------------------|
| right to apply | application process |
| waiting list placement | referrals to housing/rental programs |
| lease agreements | treatment |
| corrective actions | lease terminations |
| the appeals process | |

Business Vendors, Contractors and Bidders. The PHA acknowledges the right of all businesses vendors, contractors and bidders, business owners, managers and employees, to be treated fairly and equally, based on merit and ability, and free from discrimination based on the protected status factors listed above including, but not limited to, the following business practices:

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|---------------------|--|
| bidding process | award of contracts |
| terms of contracts | treatment of business owners and employees |
| procurement process | dispute resolution |

Affirmative Action. The PHA takes affirmative action, consistent with sound policies and applicable law, to ensure that business enterprises owned and controlled by minorities (MBE), women (WBE), and/or persons with disabilities (DBE) are afforded a maximum feasible opportunity to do business with the PHA. The PHA maintains the following goals for contract awards or purchases:

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|---------------------|---------|-----------|
| Modernization funds | 20% MBE | 10% W/DBE |
| Operating funds | 10% MBE | 5% W/DBE |
| Development funds | 10% MBE | 5% W/DBE |

The PHA's commitment to a equal opportunity and affirmative action in its business contracts is exemplified by the following requirements for all business contracts:

- PHA contractors, suppliers and vendors not discriminate against their employees, applicants for employment and any business organization.
- A nondiscrimination clause be written into all formal contracts
- Rules and regulations related to affirmative action are to be incorporated as required by federal law and the implementing regulations
- Any contractor not complying with all applicable equal employment opportunity/ affirmative action laws, directives and regulations of the federal, state and local governing bodies or agencies thereof, will be subject to appropriate legal sanctions.
- A PHA contractor's failure to make good faith efforts toward achieving stated work force and/or subcontracting goals on previous PHA contracts may be considered in determining whether the contractor is a responsible contractor/bidder on future contracts.
- If the PHA becomes aware of violations of the regulations of the Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of

Labor; Executive Order 11246, Equal Employment Opportunity; or the Civil Rights Act of 1964; a report will be made to HUD and the local OFCCP.

The PHA will commit the necessary time and resources to strive to achieve the goals of equal employment opportunity and affirmative action. The PHA has established an Equal Opportunity and Diversity Department (EOD). The EOD Director and staff develop and manage the equal employment opportunity and affirmative action (EO/AA) program. EOD responsibilities include monitoring all employment activities, reviewing and approving all hiring and employment actions, and investigating and resolving complaints of discrimination and harassment, preparing and developing the PHA's Affirmative Action Plan (AAP), reporting the effectiveness of the AAP, as required by federal, state and local agencies.

The PHA's Executive Director will receive and review reports on the progress of the EO/AA program and will provide an annual report to the Board of Commissioners.

Contact Information. Any PHA employee or applicant for employment who believes he/she has been discriminated against, should contact the EOD Director at (651) 292-6176.

Any PHA resident who believes he/she has been discriminated against, should contact their Housing Manager. If the Housing Manager is the cause of the complaint, residents should contact the Principal Manager, who is the supervisor for all Housing Management staff. Principal Managers can be reached at (651) 292-4263 for hi-rises, and (651) 292-4929 for family units.

Any applicant for public housing who believes he/she has been discriminated against, should contact the Rental Administrator at (651) 298-5111.

Any Section 8 HCV participant or applicant for Section 8 HCV programs who believes he/she has been discriminated against, should contact the Section 8 Programs Manager, who can be reached at (651) 298-5079 or the Assistant Section 8 Programs Manager, who can be reached at (651) 298-5080.

Any vendor, contractor or bidder, who believes he/she has been discriminated against, should contact the PHA Maintenance Contracts Manager at (651) 292-6092.

APPROVED BY: _____
Jon Gutzmann, Executive Director

DATE: January 25, 2006