**STOCKBRIDGE HOUSING AUTHORITY**

**EQUAL OPPORTUNITY, AFFIRMATIVE ACTION and FAIR HOUSING PLAN**

1. **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.

1. **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.

1. **Implementation Procedures**
2. Employment (Also, see Personnel Policies)
3. The phrase “Equal Opportunity/Affirmative Action Employer” is used in recruiting, employment publications, and all other advertisements.
4. All recruitment sources are advised in writing of the Authority’s commitment to equal opportunity.
5. 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.
6. When the Authority participates in work/study programs or internship programs, the equal opportunity employment goals are clearly stated.
7. All employment applicants are treated equally in the application process and are given assistance as necessary, including assistance necessitated by language barriers.
8. Specific goals for minority representation in each employment category are **challenging** to establish due to the small number of employees in each category, (**2-3** maintenance; 1 clerical; 1 professional and **1-3** resident services coordinators) and the area’s low concentration of minorities **(The census data for the Town of Stockbridge residents is a total of 9.7% with minority race/ethnicity designation. This information has been collected** from the 2014-2019 American Community Survey US Census Bureau; **24% of this minority population is under age 55 and 1.9%is age 55 or older. In the Pittsfield Metro Area 9.4% of the total population are minority race/ethnicity. 13.3% under age 55 and 4% age 55 or older with a minority race/ethnicity. Additionally, information was gathered on the following categories;** Information was gathered from the 2018-2022 US Census Bureau Data for Berkshire County in its entirety that reflects 51.2% of the population is female; 5% of the total population are Veterans and 10.7% are disabled individuals.
9. **For every job opening not filled through internal promotion the Authority shall interview a minimum of three qualified candidates, if available, and that an effort shall be made to interview at least one candidate from an underrepresented group. Every effort will be made** to hire a qualified candidate from one of these categories for the next available opening.
10. All employees are treated equally, in compliance with the requirements of the specific position and the Personnel Policies. **See Section VI.K of the Personnel policy on grievance procedures for employees of the SHA.**
11. **Workforce Analysis**

**For each department of the Authority a workforce analysis report on the number of minorities, the number of women, the number of persons with disabilities and the number of Veterans in each job category will be compiled at the end of each fiscal year.**

1. **The job categories are Maintenance/Service; Clerical; Managerial, Technical and Professional.**
2. **It will also include the number of individuals hired in each job category during the previous year and the number of minorities, women, persons with disabilities and Veterans.**
3. **The report will provide a listing of recruitment sources used during the previous fiscal year**
4. **Reports to the Department.**

**Upon request but no sooner than 90 days after the end of the Authority’s fiscal year a report will be supplied to the Department with its workforce analysis, its description of methods of publicizing job openings, and its statement of measures ensuring against discriminatory practices.**

1. Compensation
2. All employees compensated appropriately according to the Personnel Polices without regard to race, creed, color, gender, gender identification, sexual orientation, handicap, or national origin.
3. Benefits
4. 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.
5. Employees may use Personal Leave to celebrate special religious or ethnic/cultural observances.

1. Tenant Selection
2. 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.
3. 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.
4. In order to maintain affirmative action and equality of opportunity, the Authority establishes a goal of 4.0% (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.

1. Unit Assignment
2. Units are assigned as they become available, without regard to race, creed, color, gender, gender identification, sexual orientation, handicap, age or national origin.
3. Occupancy Standards
4. 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.**

**Section D.3 % Corrected BOC August 11, 2022**

**Revised and adopted by the BOC February 6, 2024 to update implantation guidelines and addition of workforce analysis.**