

Item #	Attribute	Agency/Project has a Written Policy	Staff, Volunteers and Contractors are Trained to Comply with the Written Policy	All Clients are Aware of the Agency/Project Policy
1	Agency is committed and intends to comply with HUD's Equal Access Rule (If your agency receives HUD funding for shelter or services, your agency is required to meet these standards) and State and municipal laws.	Meet with the agency's Board and administrators to discuss the importance of the Equal Access Rule, how to be compliant and gaps or areas for improvement at your agency.	Train staff, volunteers and contractors on the agency's commitment and intention to comply with the Equal Access Rule.	Educate clients on agency's commitment and intention to comply with the Equal Access Rule and the availability of the agency's Policies and Procedures.
2	For an agency legally permitted to segregate services based on gender, the agency serves all eligible clients that identify with that gender.	For an agency legally permitted to segregate services based on gender, develop a policy statement and procedures to ensure that staff, volunteers and contractors serve all eligible clients that identify with that gender.	For an agency legally permitted to segregate services based on gender, train staff, volunteers and contractors to serve all eligible clients that identify with that gender.	For an agency legally permitted to segregate services based on gender, educate clients on the agency's policy to serve all eligible clients that identify with that gender.
3	For an agency legally permitted to segregate services based on gender, the agency will not deny access because the client identification documents have a different gender marker than the client or potential client presenting for service.	For an agency legally permitted to segregate services based on gender, develop a policy statement and procedures to ensure that staff, volunteers and contractors do not deny access because the agency possesses identity documents indicating a sex different than the gender with which the client or potential client identifies.	For an agency legally permitted to segregate services based on gender, train staff, volunteers and contractors on the agency's policy that prohibits denying access because the agency possesses identity documents indicating a sex different than the gender with which the client or potential client identifies.	For an agency legally permitted to segregate services based on gender, educate clients on the agency's commitment to not deny access because the agency possesses identity documents indicating a sex different than the gender with which the client or potential client identifies.
4	The agency or project will not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes.	For an agency legally permitted to segregate services based on gender, develop a policy statement and procedures to ensure that staff, volunteers and contractors will not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes.	For an agency legally permitted to segregate services based on gender, train staff, volunteers and contractors to not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes.	For an agency legally permitted to segregate services based on gender, educate clients on the agency's commitment to not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes.
5	Agency or project does not ask questions or seek information concerning a person's anatomy or medical history beyond elements necessary for the purpose of providing services.	Develop a policy statement and procedures to ensure that staff, volunteers and contractors do not ask questions or otherwise seek information or documentation concerning a person's anatomy or medical history.	Train staff, volunteers and contractors on the agency's policy that prohibits asking questions or otherwise seek information or documentation concerning a person's anatomy or medical history.	Ensure clients understand that staff will not ask questions or otherwise seek information or documentation concerning the client's anatomy or medical history.
6	For an agency not permitted to segregate services based on gender, the agency will serve all individuals that are eligible for the project.	Develop a policy statement and procedures to ensure that staff, volunteers and contractors serve all individuals that are eligible for the project.	Train staff, volunteers and contractors on the agency's commitment serve all individuals that are eligible for the project.	Publicize the agency's commitment to serve all individuals, regardless of gender, in project literature.
7	If the Agency operates a family shelter, the Agency does not expel or decline a client of any gender if they are otherwise eligible for services.	Develop a policy statement and procedures to ensure that staff, volunteers and contractors do not expel or decline a client of any gender if they are otherwise eligible for services.	Train staff, volunteers and contractors on the agency's commitment to not expel or decline a client of any gender if they are otherwise eligible for services.	Publicize the agency's commitment to serve all families, regardless of gender, in project literature."
8	If the Agency operates a family shelter, the Agency does not expel or decline clients based on their male gender identity, regardless of age.	Develop a policy statement and procedures to ensure that staff, volunteers and contractors do not expel or decline clients based on their male gender identity, regardless of age.	Train staff, volunteers and contractors on the agency's commitment to not expel or decline clients based on their male gender identity, regardless of age.	Educate clients on the agency's commitment to not expel or decline clients based on their male gender identity, regardless of age.
9	Agency uses appropriate, inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule.	Develop a policy statement and procedures for the addition of inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule.	Train staff, volunteers and contractors on the agency's commitment to inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule.	Educate clients on the agency's commitment to inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirm the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule.
10	Agency makes Equal Access Rule policies and procedures publicly available on the agency's website and through other commonly used public notification processes.	Develop a policy statement and procedures on making Equal Access Rule policies and procedures publicly available on the agency's website and through other commonly used public notification processes.	Train staff, volunteers and contractors on availability of the Agency's Equal Access Rule policies and procedures on the agency's website and through other commonly used public notification processes.	Educate clients on availability of the Agency's Equal Access Rule policies and procedures on the agency's website and through other commonly used public notification processes.
11	Agency ensures staff, volunteers and contractors are provided a copy of the Agency's policies and practices regarding Equal Access requirements.	Develop a policy statement and procedures on providing a copy of the agency's policies and practices regarding Equal Access requirements to staff, volunteers and contractors.	Train staff, volunteers and contractors that all staff, volunteers and contractors are required to understand and follow the agency's Policies and Procedures.	Educate clients that all staff, volunteers and contractors are required to understand and follow the agency's Policies and Procedures.
12	Agency includes "gender identity" and "gender expression" to list of attributes that are protected from discrimination in the Agency's Policies and Procedures.	In the list attributes that are protected from discrimination include "gender identity" and "gender expression". If the agency's Policies and Procedures don't include a list of attributes, add them.	Train staff, volunteers and contractors on the agency's inclusion of "gender identity" and "gender expression" to list of attributes that are protected from discrimination in the agency's Policies and Procedures.	Educate clients on the agency's inclusion of "gender identity" and "gender expression" to list of attributes that are protected from discrimination in the agency's Policies and Procedures.
Harassment Policy				
13	Agency includes transgender and non-gender conforming in the list of groups vulnerable to harassment and/or list of protected groups.	In the list of protected groups within the agency's Policies and Procedures, add transgender and non-gender conforming. If your agency does not list protected groups, add a list and include this population.	Train staff, volunteers and contractors on the agency's inclusion of transgender and non-gender conforming in the list of groups vulnerable to harassment and/or list of protected groups.	Educate clients on the agency's inclusion of transgender and non-gender conforming in the list of groups vulnerable to harassment and/or list of protected groups.

14	Agency identifies harassment as a range of behaviors that are experienced as offensive, aggressive, or intimidating regardless of physical location or proximity to the project. For the LGBTQ clients this can include: consistently or maliciously not using the client's affirmed gender pronoun, asking any questions about a client's body or appearance, disclosing that a client is transgender or gender non-conforming, or physical intimidation.	Develop a policy statement and procedures that identify harassment as a range of behaviors that are experienced as offensive, aggressive, or intimidating regardless of physical location or proximity to the project. For the LGBTQ clients this can include: consistently or maliciously not using the client's affirmed gender pronoun, asking any questions about a client's body or appearance, disclosing that a client is transgender or gender non-conforming, or physical intimidation.	Train staff, volunteers and contractors to understand harassment as a range of behaviors that are experienced as offensive, aggressive, or intimidating regardless of physical location or proximity to the project. Train them to understand that for the LGBTQ clients this can include: consistently or maliciously not using the client's affirmed gender pronoun, asking any questions about a client's body or appearance, disclosing that a client is transgender or gender non-conforming, or physical intimidation.	Educate clients that harassment is a range of behaviors that are experienced as offensive, aggressive, or intimidating regardless of physical location or proximity to the project. Train them to understand that for the LGBTQ clients this can include: consistently or maliciously not using the client's affirmed gender pronoun, asking any questions about a client's body or appearance, disclosing that a client is transgender or gender non-conforming, or physical intimidation.
15	Agency ensures the client understands their rights if they are experiencing harassment and discrimination; expectations for non-harassment and non-discrimination behaviors, respect for other clients and the importance of maintain confidentiality.	Develop a policy statement and procedures ensuring staff, volunteers and contractors educate clients on their rights if they are experiencing harassment and discrimination; expectations for non-harassment and non-discrimination behaviors, respect for other clients and the importance of maintain confidentiality.	Train staff, volunteers and contractors on their responsibility to educate clients on their rights if they are experiencing harassment and discrimination; expectations for non-harassment and non-discrimination behaviors, respect for other clients and the importance of maintain confidentiality.	Educate clients on their rights if they are experiencing harassment and discrimination; expectations for non-harassment and non-discrimination behaviors, respect for other clients and the importance of maintain confidentiality.
16	Agency requires project staff, contractors, volunteers and clients to use client's preferred gender and pronoun.	Develop a policy statement and procedures on the requirement that staff, volunteers, vendors and clients use the transgender client's preferred gender and pronoun.	Train staff, volunteers and contractors on the agency's policy that requires staff, volunteers, contractors and clients to use transgender client's preferred gender and pronoun.	Educate clients on the agency's policy that requires staff, volunteers, vendors and clients to use transgender client's preferred gender and pronoun.
Managing and Resolving Violations				
17	Agency has a formal grievance process that is prompt, transparent and consistent. The grievance process will be resolved in ___ [timeframe].	Develop a policy statement and procedures on a grievance process that is prompt, transparent and consistent. Include the time it will take to resolve the issue.	Train staff, volunteers and contractors on the agency's formal grievance process ensuring that it is prompt, transparent and consistent.	Educate clients on the agency's formal grievance process ensuring that it is prompt, transparent and consistent.
18	Agency takes immediate action to resolve inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers, contractors or clients). Staff training includes role play on interventions (staff to staff, staff to resident, and resident to resident).	Develop a policy statement and procedures that the agency will take immediate action to resolve inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers, contractors or clients). Staff, volunteer, and contractor training includes role play on interventions (staff to staff, staff to resident, and resident to resident).	Train staff, volunteers and contractors on their responsibility to resolve inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers and contractors or clients). Staff, volunteer, and contractor training includes role play on interventions (staff to staff, staff to resident, and resident to resident).	Educate clients on how inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers, contractors or clients) will be resolved.
19	Agency mediates and resolves conflicts between clients in a way that is respectful, fair and equitable.	Develop a policy statement and procedures on mediating and resolving conflicts between clients in a way that is respectful, fair and equitable.	Train staff, volunteers and contractors on their responsibility to mediate and resolve conflicts between clients in a way that is respectful, fair and equitable.	Educate clients that staff, volunteers and contractors will mediate and resolve conflicts between clients in a way that is respectful, fair and equitable.
20	Agency has policy that if a client needs to be moved for harassment and safety concerns, the agency will have a preference to move the client with a bias.	Develop a policy statement and procedures that ensure if a client needs to be moved due to harassment and/or safety concerns, the agency will have a preference to move the client with a bias.	Train staff, volunteers and contractors on the agency's policy that if a client needs to be moved due harassment and/or safety concerns, the agency will have a preference to move the client with a bias.	Educate clients on the agency's policy that if a client needs to be moved due harassment and/or safety concerns, the agency will have a preference to move the client with a bias.
21	Agency has a sanction process for violations committed by staff, volunteers or vendors (For example, formal documentation in employee's file, suspension, firing or legal action based on the type(s) and severity of harassment). Sanctions are enforced every time there is a violation and sanctions are consistently applied.	Develop a policy statement and procedures on the sanction process that addresses violations to the agency's anti-discrimination policy and Equal Access Rule. The sanction process should be applied consistently.	Train staff, volunteers and contractors on the agency's sanction process for violations committed by staff, volunteers and contractors (for example, formal documentation in employee's file, suspension, firing or legal action based on the type(s) and severity of harassment) including how they are enforced and applied.	Educate clients on the agency's sanction process for violations committed by staff, volunteers, contractors or clients (For example, moving to a different area of the shelter, temporary ban from project based on the type(s) and severity of harassment) including how they are enforced and applied.
22	Agency develops partnerships with organizations that can provide expertise around the process of changing gender markers on identification and benefit applications or ensures subject matter expertise among staff.	Develop a policy statement and procedures ensuring staff, volunteers and contractors can provide information to clients on changing gender markers on identification or benefit applications or can refer clients to experts with that knowledge.	Train staff, volunteers and contractors to provide information to clients on changing gender markers on identification or benefit applications or refer clients to experts with that knowledge.	Ensure clients understand that information is available if they want to learn about the process of changing their gender marker on identification or benefit applications.
23	Agency ensures the clients without ID understand the resources available to obtain ID, as IDs are required for obtaining employment, accessing benefits and many other services important to self-sufficiency.	Develop a policy statement and procedures ensuring staff, volunteers and contractors educate clients on the resources available to obtain ID if they do not have one.	Train staff, volunteers and contractors on their responsibilities to educate clients on the resources available to obtain ID if they do not have one.	Inform clients of the resources available to obtain ID if they do not have one.
24	Agency has policy to correct any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their non-conforming gender expression during risk-based conversations.	Develop a policy statement and procedures that ensure the correction of any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their non-conforming gender expression during risk-based conversations.	Train staff, volunteers and contractors on requirements to correct any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their non-conforming gender expression during risk-based conversations.	Educate clients on any misinformation or inaccurate conclusions that transgender clients threaten the health or safety of other clients solely based on their non-conforming gender expression during risk-based conversations.
Confidentiality Practices				
25	Agency keeps a client's transgender status confidential, unless the client gives permission to share this information.	Develop a policy statement and procedures that keep a client's transgender status confidential, unless the client gives permission to share this information.	Train staff, volunteers and contractors on their responsibility to keep a client's transgender status confidential, unless the client gives permission to share this information.	Ensure clients know that any information related to their gender identity will be kept confidential.

26	Agency ensures that only essential staff, identified by administrators, are told about a client's transgender status to ensure equal access and safety.	Develop a policy statement and procedures that ensure that only essential staff, identified by administrators, are told about a client's transgender status to ensure equal access and safety.	Ensure staff, contractors, and volunteer know and understand the impact and consequences of breaching a client's confidentiality and releasing information related to their gender identity or transgender status.	Communicate this policy to clients at intake.
27	Agency ensures that when a client's gender identity and sex assigned at birth differ, that difference is treated as confidential medical information and may not be disclosed without specific, time-limited written client consent	Develop a policy statement and procedures that ensure that when a client's gender identity and sex assigned at birth differ, that difference is treated as confidential medical information and may not be disclosed without specific, time-limited written client consent	Train staff, volunteers and contractors on their responsibility to ensure that when a client's gender identity and sex assigned at birth differ, that difference is treated as confidential medical information and may not be disclosed without specific, time-limited written client consent	Educate clients that staff, volunteers and contractors are responsible to ensure that when a client's gender identity and sex assigned at birth differ, that difference is treated as confidential medical information and may not be disclosed without specific, time-limited written client consent
28	Agency supports all clients in understanding their privacy rights and the implication of releasing information.	Develop a policy statement and procedures to ensure clients understand their privacy rights and the implication of releasing information. For example, staff understands the implication of selecting transgender when entering information into HMIS.	Train staff, volunteers and contractors on how to ensure clients understand their privacy rights and the implication of releasing information. For example, staff understands the implication of selecting transgender when entering information into HMIS.	Ensure clients are informed of their privacy rights and understand the implications for releasing information.
29	Agency ensures staff, volunteers and contractors understand that a client's sex assigned at birth is confidential information and the potential impact that disclosure can have on a client's progress to self-sufficiency.	Develop a policy statement and procedures that maintain a client's sex assigned at birth as confidential information and describes the potential impact that disclosure can have on a client's progress to self-sufficiency.	Train staff, volunteers and contractors to uphold a client's sex assigned at birth as confidential information and to understand the potential impact that disclosure can have on a client's progress to self-sufficiency.	Ensure clients are informed of the policy at intake and the process for filing a complaint if any breach should occur.
30	Agency is committed and complies with federal, state and local privacy laws.	Develop a policy statement and procedures ensuring staff, volunteers and contractors understand their responsibilities to uphold federal, state and local privacy laws.	Train staff, volunteers and contractors on their responsibilities to uphold federal, state and local privacy laws and the consequences of failing to meet those responsibilities.	Ensure clients are informed of their privacy rights and the measures the agency's take to uphold these rights.
31	Agency keeps the client's legal name and/or sex at birth confidential unless the client gives written permission otherwise. Written and verbal consent are different. Written consent is a document that articulates the manner and extent to which the client's information will be shared and the client signs the document to confirm their permission. The staff should make sure the client understands the written permission they are giving. Verbal consent requires the staff and client to discuss the manner and extent to which the client's information will be shared in a way that is understood by the client and the client verbally affirms some level of sharing.	Develop a policy statement and procedures that keep the client's legal name and/or sex at birth confidential unless the client gives written permission otherwise and that staff should make sure the client understands the written permission they are giving. And further, verbal consent requires the staff and client to discuss the manner and extent to which the client's information will be shared in a way that is understood by the client and the client verbally affirms some level of sharing.	Train staff, volunteers and contractors on their responsibility to keep the client's legal name and/or sex at birth confidential unless the client gives written permission otherwise and that staff should make sure the client understands the written permission they are giving. And further, verbal consent requires the staff and client to discuss the manner and extent to which the client's information will be shared in a way that is understood by the client and the client verbally affirms some level of sharing.	Educate clients that staff, volunteers and contractors are responsible to keep the client's legal name and/or sex at birth confidential unless the client gives written permission otherwise and that staff should make sure the client understands the written permission they are giving. And further, verbal consent requires the staff and client to discuss the manner and extent to which the client's information will be shared in a way that is understood by the client and the client verbally affirms some level of sharing.
Data Collection				
32	Agency permits clients to request a private space to complete intake and data collection.	Develop a policy statement and procedures on the client's right to request a private space to complete intake and data collection.	Train staff, volunteers and contractors to provide a private space to complete intake and data collection.	Educate clients that the agency permits clients to request a private space to complete intake and data collection.
33	Agency ensures that gender identity is not required to match the gender listed on the ID or documents	Develop a policy statement and procedures that ensure gender identity is not required to match the gender listed on the client's ID or documents	Train staff, volunteers and contractors on the agency's policy that gender identity is not required to match the gender listed on the client's ID or documents	Educate clients on the agency's policy that gender identity is not required to match the gender listed on the clients ID or documents
34	Agency ensures staff, volunteers and contractors understand that a client may not present as the way they identify; staff, volunteers and vendors will respect the client's identity.	Ensure this practice is incorporated into staff/volunteer/contractor training and orientation.	Train staff, volunteers and contractors that a client may not present as the way they identify and that staff, volunteers and contractors should respect the client's identity.	Ensure clients understand that staff, volunteers and contractors will respect a client's identity.
35	Agency intake materials allow for client's to indicate their legal name and the name they prefer to go by.	Regularly review intake material for compliance with Equal Access Rule.	Train staff, contractors, and volunteers to use a client's preferred name rather than their legal name.	Ensure clients understand the process for filing a complaint if staff are not using their preferred name, within reasonable expectations.
36	If intake materials include preferred gender identity, that gender identity is supported by the Agency.	If intake materials include preferred gender identity, develop a policy statement and procedures that gender identity is supported by the agency.	Train staff, volunteers and contractors that if intake materials include preferred gender identity, that gender identity is supported by the agency.	Educate clients that if intake materials include preferred gender identity, that gender identity is supported by the Agency.
Safety Practices				
37	Agency ensures that clients with prescribed hormones or other medications as part of their gender-affirming healthcare regime have access to those medications.	Ensure that all medications, properly prescribed, are treated according to the project's policy.	Train staff to treat all prescribed medication consistent with project policy. Similarly all undocumented medication should be treated consistent with project policy.	Educate clients on the medication policy of the project for prescription and non-prescription medications.
38	Agency will respect the client's evaluation of their own safety with regard to proposed housing options and accommodate reasonable client requests regarding safety. For example, a transgender man that does not feel safe in a men's congregate sleeping area could request assignment to the bed closest to staff. Staff, volunteers and contractors should reasonably defer to client's request.	Develop a policy statement and procedures to respect the client's evaluation of their own safety with regard to proposed housing options and accommodate reasonable client requests regarding safety. For example, a transgender man that does not feel safe in a men's congregate sleeping area could request assignment to the bed closest to staff. Staff, volunteers and contractors should reasonably defer to client's request.	Train staff, volunteers and contractors to respect the client's evaluation of their own safety with regard to proposed housing options and accommodate reasonable client requests regarding safety. For example, a transgender man that does not feel safe in a men's congregate sleeping area could request assignment to the bed closest to staff. Staff, volunteers and contractors should reasonably defer to client's request.	Ensure clients understand that the agency will respect the client's evaluation of their own safety with regard to proposed housing options and accommodate reasonable requests regarding safety. For example, a transgender man that does not feel safe in a men's congregate sleeping area could request assignment to the bed closest to staff. Staff, volunteers and contractors should reasonably defer to client's request.

39	Client has a right to request accommodations based on their personal safety concerns.	Develop a policy statement and procedures to require staff to evaluate and respond to reasonable client requests for safety based accommodations and document the outcomes.	Train staff, volunteers and contractors that clients may request reasonable safety based accommodation and how to consistently evaluate those requests and document outcomes.	Educate clients that the client has a right to request accommodations based on their personal safety concerns.
40	Staff will recommend accommodations based on safety concerns to residents.	Develop a policy statement and procedures on staff, volunteers and contractors responsibility to recommend accommodations based on safety concerns to residents.	Train staff, volunteers and contractors to recommend accommodations based on safety concerns to residents.	Educate clients that staff, volunteers and contractors will recommend accommodations based on safety concerns to residents.
41	Agency ensures that if a physical search or urine test is required for admission, the client can choose the gender of the staff person conducting the search. If someone of that gender is not available, the Agency will select a staff person that understands the concerns of the client, will be respectful and will uphold the agency's policies and procedures with regard to transgender clients.	Develop a policy statement and procedures on physical searches or urine tests if they apply. Indicate that the client can choose the gender of the staff person conducting the search. If someone of that gender is not available, the agency will select a staff person that understands the concerns of the client, will be respectful and will uphold the agency's policies and procedures with regard to transgender clients.	Train staff, volunteers and contractors to respectfully conduct physical searches or urine tests if required for admission and that the client can choose the gender of the staff person conducting the search. If someone of that gender is not available, the agency will select a staff person that understands the concerns of the client, will be respectful and will uphold the agency's policies and procedures with regard to transgender clients.	Educate clients that the agency will ensure that if a physical search or urine test is required for admission, the client can choose the gender of the staff person conducting the search. If someone of that gender is not available, the Agency will select a staff person that understands the concerns of the client, will be respectful and will uphold the agency's policies and procedures with regard to transgender clients.
Facility Enhancements				
42	Agency will take measures to create a safe environment for transgender clients. When possible the Agency will ensure construction or rehabilitation of the physical property, including sleeping area, bathrooms, and showers promote privacy and safety.	Develop a policy statement and procedures on creating a safe environment for transgender clients including when possible the construction or rehabilitation of the physical property, including sleeping area, bathrooms, and showers promote privacy and safety.	Train staff, volunteers and contractors on measures to create a safe environment for transgender clients.	Educate clients on the agency's commitment and measures to create a safe environment for transgender clients.
43	Agency has a single check-in area for both genders.	Develop a policy statement and procedures for a single check-in area for both genders.	Train staff, volunteers and contractors to manage a single check-in area for both genders.	Educate clients on agency's expectations on the client's use of the single check-in area for both genders.
44	If the Agency only offers congregate bathrooms, all urinals/toilets have individual stalls to support client safety.	Develop a policy statement and procedures on client safety related to congregate bathrooms including individual stalls for urinals/toilets.	Train staff, volunteers and contractors on use and management of congregate bathrooms to support client safety.	Educate clients on agency's expectations on the client's use of congregate bathrooms and that all urinals/toilets have individual stalls to support client safety.
45	If the Agency only offers congregate showers, each shower head will have individual stalls to support client safety.	Develop a policy statement and procedures on congregate showers to support client safety including the provision of individual stalls for each shower head.	Train staff, volunteers and contractors on use and management of congregate showers to support client safety.	Educate clients on agency's expectations on the client's use of congregate showers and that each shower head has individual stalls to support client safety.
Additional Areas				
46	Agency offering services and shelters will offer individual gender-neutral bathroom for all clients.	Develop a policy statement and procedures on offering individual gender-neutral bathroom for all clients.	Train staff, volunteers and contractors on use and management of individual, gender-neutral bathroom for all clients.	Educate clients on agency's expectations on the client's use of individual, gender-neutral bathrooms.
47	Agency offering services and shelters will offer individual gender-neutral shower rooms for all clients.	Develop a policy statement and procedures on offering individual gender-neutral shower rooms for all clients.	Train staff, volunteers and contractors on use and management of individual, gender-neutral shower rooms for all clients.	Educate clients on agency's expectations on the client's use of individual, gender-neutral shower rooms.