

AFFIRMATIVE FAIR HOUSING MARKETING PLAN GUIDE

INTRODUCTION

Affirmative Fair Housing Marketing Plan (AFHMP) should demonstrate meaningful efforts to identify and attract underserved populations in the housing market area. Underserved populations may not apply for housing without special outreach efforts.

This guide was developed to assist someone developing or updating an Affirmative Fair Housing Marketing Plan (AFHMP) required by HUD, Low-Income Housing Tax Credit (LIHTC) Qualified Allocation Plan or National Housing Trust Fund.

BACKGROUND

HUD implemented Affirmative Fair Housing Marketing Plans to prevent redlining in communities (segregating race or ethnicity in defined housing areas). Many properties need to make efforts beyond their normal or current advertising to directly reach and successfully attract underserved populations to increase diversity. The affirmative marketing plan should strive to house both majority and minority populations represented in the housing market area thus ensuring that segregation/redlining does not intentionally occur.

WHAT IS AFFIRMATIVE MARKETING?

Affirmative Marketing means to understand the housing market area's demographics, identify underserved populations then implement marketing efforts beyond current or usual methods of advertising to increase a more diverse applicant pool then house a more diverse population. It often requires taking extra effort to directly market to underserved populations living in the housing market areas.

Affirmative Marketing should demonstrate efforts of the owner/agent to reach underserved populations through community contacts and other direct methods of advertising.

- Direct efforts might be minority or specialized publications i.e. magazine, newspaper, radio or television or building relationships with organizations, churches, agencies or businesses who work directly with an underserved population.
- Consider the use of alternate advertising formats i.e. by translating advertising in a language used by a minority population; providing alternate formats i.e. braille, large print, audio tapes, etc.
- Periodically review the special marketing efforts and evaluate successes and failures. Determine how to expand on the successes or make changes on areas needing improvement.

AFHMP REGULATIONS

The regulations can be found in Title 24 Housing and Urban Development, Part 200-Introduction to FHA Programs, Subpart M—Affirmative Fair Housing Marketing Regulations.

[HUD AFHMP Regulations](#)

IOWA HOME & NATIONAL HOUSING TRUST FUND & LIHTC PROGRAMS

Projects that have received HUD funding (HOME funds or National Housing Trust Fund) are required to provide an AFHMP. In addition, Projects allocated Low-Income Housing Tax Credits from 2009 forward are required to complete an AFHMP. All programs are following the requirements at HUD Subpart M, CFR24 Part 200.620.

At a minimum, the AFHMP for multifamily rental projects should be reviewed every five years by pulling current demographics, comparing them with current resident percentages then describing successes and/or failures with community contacts and marketing methods. For HOME Tenant Based Rental Assistance or Homebuyer Programs a new plan is required for each new contract.

The Iowa Finance Authority **requires all properties to target Persons with Disabilities**, regardless of percentages listed.

HOUSING PROTECTED CLASSES:

Federal

Color
Race
Sex
National Origin
Religion
Disability
Familial Status

State

Creed
Sexual Orientation
Gender Identity
Retaliation

Federal HUD requirements and Local protected classes may expand this list.

WHAT FORM DO I USE?

HOME, NATIONAL HOUSING TRUST FUND & LIHTC MULTIFAMILY RENTAL

- **Multifamily Rental** - The use of the most current HUD form. As of the date of this publication HUD-935.2A (12/2011) OMB Approval No. 2529-0013 (exp. 1/31/2021). This form can be found at: <https://www.hud.gov/sites/dfiles/OCHCO/documents/935-2A.pdf>

OTHER HOME PROGRAMS

- **Tenant-Based Rental Assistance (TBRA)** - Iowa Finance Authority has developed a specific form for TBRA which was revised November 2017. The form is can be found on our website: <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/114>
Click on Forms and Information for Civil Rights & Fair Housing
- **Homebuyer** - Iowa Finance Authority has developed a specific form which was revised November 2017. The form is can be found on our website: <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/112>
Click on Forms and Information for Civil Rights & Fair Housing

GETTING YOUR PLAN STARTED...

GENERAL PROPERTY INFORMATION

Regardless of the type of program, each AFHMP form will request general project information. These sections should be self-explanatory.

GEOGRAPHIC AREAS

In order to complete an Affirmative Fair Housing Marketing Plan (AFHMP), demographics need to be pulled for the project from the geographic areas listed below:

- Census Tract (if available),
- Housing Market Area (town/city)
- Expanded Market Area (county/MSA)

The US Census Bureau's American Fact Finder can be located at:

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

We suggest using a **Guided Search**, then click on **“GET ME STARTED”**

To Locate Race and Ethnicity Percentages:

Step 1 – **Start** - Choose: I'm looking for information about people. Click on NEXT.

Step 2 – **Topics** – Click on NEXT when looking for Race and Ethnicity data.

Step 3 – **Geographic Area** – Choose a specific area (Census Tract; City or Town; County or MSA). After selecting each geographic selection – *Add to Your Selections*. Each geographic category can be added individually or combined. Click on NEXT.

Step 4 – **Race/Ethnicity Groups** – Select from Basic Groups. Choose: Alaska Native, American Indian, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, White, then click on NEXT.

Step 5 – **Search Results** - Use the most current ACS Demographic and Housing Estimates – DP01 if new census; otherwise most current DP05.

Step 6- **Table Viewer** – Brings up the report. You can print or download the report.

To Locate Disability Percentages:

Step 1 – Start - Choose: I'm looking for information about people. Click on NEXT.

Step 2 – Topics –

- Click on *Disability*
- Then select *Disability* from the list and it will add it to – *Your Selections*, click on NEXT.

Step 3 – Geographic Area – Choose a specific area (Census Tract; City or Town; County or MSA). Then *Add to Your Selections*. Each geographic category can be added individually or combined. Click on NEXT.

Step 4 – Race/Ethnicity Groups – *Skip this Step* or click on NEXT.

Step 5 – Search Results – Select Disability Characteristics S1810 - Use the most current dataset if more than one dataset is shown.

Step 6- Table Viewer – The first line item of the report is “Total civilian noninstitutionalized population” use the percent with a disability.

To locate the % of Families with Children under age of 18:

Step 1 – Start - Choose: I'm looking for information about people. Click on NEXT.

Step 2 – Topics –

- Click on *Relationship*
- Then select *Family Type* from the list and it will add it to – *Your Selections*, click on NEXT.

Step 3 – Geographic Area – Choose a specific area (Census Tract; City or Town; County or MSA). Then *Add to Your Selections*. Each geographic category can be added individually or combined. Click on NEXT.

Step 4 – Race/Ethnicity Groups – *Skip this Step* or click on NEXT.

Step 5 – Search Results – Households and Families S1101 - Use the most current dataset if more than one dataset is shown.

Step 6- Table Viewer – on the report look for *SELECTED HOUSEHOLDS BY TYPE* then lists “Households with one or more people under 18 years”, use the “total” estimate percentage for the geographic region.

NOTE: This may not be the only way to pull demographic data from the census site. It is a simplified way to obtain. If you have questions on obtaining census information for your property, please contact Nancy Peterson at the Iowa Finance Authority (800)432-7230 or 515-725-4900.

DEMOGRAPHIC WORKSHEET

Acquisition Rehab, Rehab, or an Existing Property

If the property has existing tenants, the Project's Resident column on the Demographic Worksheet should be completed. The existing tenant percentages should be used to analyze if a minority group is still underserved at the property. Demographic percentages should be analyzed to determine if the property has been successful in housing underserved populations.

Applicant Data

If demographic information is gathered from applicants at time of application, please complete the Project's Applicant Data column. Otherwise, this can be left blank. These percentages should be analyzed to determine if the property has been successful attracting minority applicants.

New Construction, Adaptive Reuse or Homebuyer

For properties that have not placed in service or have not been purchased, the Project's Resident column will be left blank on the Demographic Worksheet. Then analysis will be based solely on the Census Tract, Housing Market Area and Expanded Housing Market Area until the next evaluation.

Enter All Percentages

Once the percentages have been gathered enter the percentages into the demographic worksheet.

This allows you to start analyzing the information pulled:

Determine the Majority Population

The highest percentage of all race or ethnicity in each geographical area represents the Majority Population. The majority may not need special outreach because general advertising methods and word of mouth may reach the majority population. There could be exceptions, one example, if heavy concentration(s) of one or more minority group is found living at a property and the majority population is not present or extremely low. This indicates the need to make effort to attract the majority population to proactively overcome the appearance of redlining in the property or project area.

Minority Populations (Underserved)

Minority populations have lower percentages. Effort needs to be made to invite them to apply at the property.

Evaluate the Demographic Percentages Using A Consistent Method Of Measure:

IFA suggests:

⇒ **IF 1% OR GREATER = Should attempt to TARGET the underserved population**

⇒ **IF LESS THAN 1% = DON'T TARGET.**

Generally, there is not sufficient opportunity to directly advertise or reach populations with less than 1% in a demographic area. The plan should describe how the property can reach populations being targeted.

Are there exceptions to the 1% measure?

Yes. This guide cannot cover all exceptions or examples but here are a few:

Some demographic areas may not have a minority population with 1% or greater. The plan may need to be expanded to include a larger region or multiple counties surrounding the housing market area. This area should be expanded until you can identify at least one minority population closest to the property that has greater than 1%.

If an underserved population is known to exist in the housing area yet the demographics do not represent them in the census data, your knowledge of the community should be considered for direct marketing opportunities. If this occurs, list under "other" and specify the underserved population.

If "Other" is selected or other exceptions are identified provide additional information. Each form has a section called "Additional Considerations". Explain exceptions or additional information in this section. If necessary, attach an additional sheet with this information and place a note in this section "see attached".

TARGETED MARKETING ACTIVITY

When the Worksheet is complete use this information to select the "Targeted Marketing Activity" in AFHMP FORM. (i.e. Section 3b. in the HUD Multifamily AFHMP)

Each groups selected shall be identified in the community contact worksheet and advertising methods worksheet.

COMMUNITY CONTACTS AND ADVERTISING METHOD WORKSHEETS

- List each targeted group separately on each worksheet (preferred).
- Use local contacts and advertising sources, before moving to county, regional or state contacts.
- Develop positive relationships and have continued communication with these contacts.
- Community Contacts and Advertising Methods should be known to effectively reach targeted populations prior to advertising.

SAMPLE WORKSHEETS - COMMUNITY CONTACT AND METHODS OF ADVERTISING

Attached to this AFHMP Guide are samples of two worksheets; one for Community Contact information required and the second Methods of Advertising. If you wish to develop your own WORD table or Excel Spreadsheet in place of the form's worksheet you may. Please note in the form "See Attached Worksheet". These samples follow HUD's instructions.

Note: Because the HUD multifamily rental form is most frequently used the samples have been named Worksheet 3 and Worksheet 4.

MAINTAIN A FILE

A file helps you establish:

- HOW you determined what outreach was needed.
- WHAT was done? Document actions taken.
- WHEN actions were taken.
- WHY decisions were made to change or expand efforts.

Community Contact Journal is a good way to document all special outreach efforts. A sample journal is shown on the next page.



SAMPLE

Affirmative Fair Housing Marketing Plan

Community Contact Journal

For each underserved population identified in the Affirmative Fair Housing Marketing Plan (AFHMP), please keep records like this journal to document special outreach efforts. This will assist you when completing Community Contacts and Methods of Advertising in the plan. This information may be helpful in evaluating your marketing activities for future activities and updates.

Project Name: Telephone Number:
 Project Contract Number(s): Email Address:
 Community Contact Name: Fax Number:
 Contact Person: Website:
 Full Address:

Describe the Organization:

Targeted Population:

Describe previous experience working with this population:

Describe how they will assist you to reach the targeted population:

Will alternate format(s) be used? (Example: Braille, large print, alternate language) Yes / No
 If yes, briefly describe:

Date of Contact	Method of Communication (in person, telephone, email, US mail, etc.)	Description of Contact Made (highpoints of discussions, and outcome)	Person's Name Making the Contact

Attach a copy of the advertising or marketing material(s) used.

EQUAL HOUSING OPPORTUNITY ADVERTISING

All advertising of residential real estate for sale, rent, or financing should contain an equal housing opportunity logo, statement, or slogan as a means of educating the home seeking public that the property is available to all persons. The choice of logo, statement or slogan will depend on the type of media used (visual or auditory) and size of the advertisement.



- See Part 109 Fair Housing Advertising:
https://www.hud.gov/sites/documents/DOC_7781.PDF
- See HUD Web Publishing Standards:
<http://portal.hud.gov/hudportal/documents/huddoc?id=WebPubStandards.pdf>

SECTION 504 ACCESSIBILITY REQUIREMENTS

Section 504 of the Rehab Act makes it illegal for federal agencies, programs or activities that receive federal financial assistance or are conducted by a federal agency, to discriminate against qualified individuals with disabilities. Requirements under Section 504 include reasonable accommodation for employees with disabilities, program accessibility, effective communication with people who have hearing or vision disabilities, and accessible new construction and alterations. HOME and Iowa LIHTC properties are required to meet or exceed Section 504 accessibility requirements in that 5% of the total units must be fully accessible for mobility impairments and 2% of the total units must be accessible for persons with visual and hearing impairments.

LIHTC properties should verify property requirements by reviewing the Land Use Restriction Agreement (LURA).

SYMBOLS OF ACCESSIBILITY

Accessible facilities which meet the Uniform Federal Accessibility Standards (UFAS) 4.1, Minimum Requirements, may use the international symbol of accessibility. The symbol shall be displayed as:



PUBLIC ACCESS

Fair Housing Posters, Affirmative Fair Housing Marketing Plans, Tenant Selection Criteria and other management policies should be displayed and made available for public review. Property signs (if applicable), should contain the EHO logo, statement or slogan and symbol of accessibility if meets UFAS minimum requirements. A picture should be taken of the sign and attached to the AFHMP. If the sign has not been constructed when the AFHMP is submitted provide copy of the sign design and content prepared by the sign manufacture or architect.

INSTRUCTION/TRAINING

Agents and employees must be provided verbal and written instructions regarding policies of non-discrimination and fair housing. Training/instruction questions will be asked about Fair Housing Act and Affirmative Fair Housing Marketing. Dates, content and anticipated training should be tracked and copies of training materials should be kept.

HIRING PRACTICES

Owners are required to maintain a non-discriminatory hiring policy for staff engaged in the rental of properties under Affirmative Fair Housing Marketing Regulations.

EVALUATING THE PLAN (MINIMUM EVERY FIVE YEARS)

The Affirmative Fair Housing Marketing Plan must be reviewed at least every five years for multifamily projects. The AFHMP may need to be updated if the demographics of the housing areas have changed. The AFHMP may need updated if the property did not have success in attracting targeted underserved populations.

Homebuyer and Tenant-Based Rental Assistance projects should have a new plan for each contract awarded. Evaluate the previous contracts' success or failure attracting minority or underserved populations. Then then change community contacts or advertising methods that have not been shown to attract targeted populations.

Tenants/Applicants should provide:

- How they heard about the property?
- If they could benefit from accessible features in the unit?
- Race and ethnicity information, if willing to provide.

The Property should:

- Document advertising methods and maintain copies of ads used to attract targeted populations and the general public.
- New demographics should be pulled and input into a demographic worksheet. Compare with previous data to determine if changes have occurred.
- Does demographic data accurately represent the property over the last five years?
- Has targeted populations increased or decreased?
- Determine if the demographic composition of the residents have changed?
- Document dates and content of communication with community contacts. Were relationship's successful?
- Did the advertising methods attract targeted populations?
- Is training and instruction current? If no, plan and document updated training for staff.
- Describe how previous plan has been successful and remains valid or provide an updated plan to implement going forward.

THE GOAL

- ATTRACT TARGETED APPLICANTS (Underserved) – Ensure all persons have knowledge of housing opportunities and are offered housing without discrimination for persons who qualify.
- DIRECT MARKETING IS ONGOING – Demonstrate meaningful attempts to increase underserved populations. (Race, ethnicity, Persons with Disabilities, Families with Children, etc.)
- REVIEW AND ADJUST – Review demographics by making a conscience effort to understand the community and changes in underserved populations then adjusting, if needed, after the initial plan has been completed and approved.
- INCLUSIVE AND DIVERSE – The property should strive to house both majority and minority populations represented in the housing market areas thus ensuring that segregation or redlining does not intentionally occur.

ADDITIONAL PROPERTY INFORMATION FOR RENTAL PROJECTS

Supply copies of these documents with your AFHMP:

- Lease
- Lease Addendums (NOTE: Some may be required by the Qualified Allocation Plan)
- Tenant Selection Criteria
- Community Rules and Regulations
- Waiting List Policies
- IowaHousingSearch.org advertising

REVIEW THE AFHMP FOR COMMON ERRORS!

PROJECT NUMBER

The HOME, National Trust Fund and/or LIHTC project number is incorrectly listed. If there is more than one number, list both.

TARGETED MARKETING

All Race and Ethnicity boxes were checked. Please review your demographic data. In Iowa it is not likely that you can directly market to all demographic groups.

All awarded projects are required to target Persons with Disabilities by the Iowa Finance Authority.

COMMUNITY CONTACT WORKSHEET – (See sample on page 11)

1st Column – List targeted populations the community contact can directly market to.

2nd Column – Follow the forms' instructions at the top of the page. Provide the contact's name, organization, address, phone number and/or email address for each community contact. A brief description of their previous experience working with each population listed in the first column of this form. The date contact was made or will be made. How the contact plans to assist you with the AFHMP.

Note: Low income does not adequately describe a specific targeted population even though a household's income level may be a program requirement.

MARKETING ACTIVITIES – METHODS OF ADVERTISING WORKSHEET (See sample on page 12)

1st Column – List the name of the advertiser under the category of advertising to be used.

Additional Columns – List each targeted population in a separate column, then list all direct advertising methods used to reach the population. Direct advertising is having specific knowledge of how the ad will reach a population prior to advertising. If alternative formats are used identify the type e.g. braille, large print, alternate language, etc. One column can be used to identify general advertising done which could attract anyone with access. It is not possible to determine with any certainty who (what populations) will access these methods at the time of publication.

Attach copies of advertising listed on the Worksheet.

Sign and Date the Plan

The person responsible for implementing and reviewing the plan is required to sign and date the plan prior to approval.

AFHMP SAMPLE WORKSHEET 3

Worksheet 3: Proposed Marketing Activities – Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

TARGETED POPULATION(s)	COMMUNITY CONTACTS(s) including required information noted above.
List a specific population	List Name, Address, Contact Name, Phone Number, email of contact. Date of Contact. Explain how this contact has experience working with the group listed to the left. If more than one group listed please specify experience with each group. Then explain how they have agreed to assist you in marketing to the group(s).
Example:	
Black/African American	NAACP, 123 Street, City, State, Bob Jones, Director bobj@naacp.org September 1, 2016, NAACP is an organization which supports rights of Black/African American persons in the community. They will include advertising for the property in the monthly newsletter.
Latino/Hispanic	El Rodeo, 345 Street, City, State, Michael Gomez mgomez@elrodeo.com . August 25, 2016 Serves the local Latino/Hispanic community by promoting cultural activities. They have agreed to display the brochure on their bulletin board and make staff aware of this apartment community.
Asian	Korean Methodist, 789 Street, City, State, Lee Min-ho, Pastor. Aug 3, 2016 Serves the Korean community in the XYZ area and holds Sunday services. Pastor will include information in the weekly bulletin translated in Korean and English to inform parishioners.
Persons with Disabilities	Aging Resources 1001 X Street, City, State, Lisa Smith, September 6, 2016, Works with a variety of individuals that have disabilities and provides referrals for services. Will provide brochures when housing assistance is needed.

AFHMP SAMPLE WORKSHEET 4

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials.

Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Populations→		Black/African American	Hispanic/Latino	Asian	American Indian	Persons with Disabilities
Methods of Advertising ↓	General Advertising					
Newspapers: ABC Daily Journal XYZ Tribune	1 x 1 ad in apartment for rent section		El Conquistador 2x2 ad in Spanish		Reservation News 2 x 4 ad in English	
Radio Stations: Los El Radio KJJY KGGO			Ad in Spanish 6am, Noon, 5pm Monday-Friday			
TV Stations: KCCI WHO	12pm & 12am 1 minute segments for both stations.					
Electronic Media: Facebook Apartment.com Property Management.com	Facebook post Apartment.com ad Property website ad					
Bulletin Boards: Restaurants Agencies			American/Mexican AM Vets Club 8 ½ x 11 in Spanish	8 ½ x 11 Mandarin Restaurant		8 ½ x 11 housing information in braille.
Brochures Notices, Flyers: Hy-Vee NAACP Urban Dreams Diamante Aging Resources	Hung 8 ½ x 11 flyer in English at local grocery stores	Hung 8 ½ X 11 flyer to Director at NAACP in English. Brochure & provided to staff at Urban Dreams	Brochure provided in Spanish to Diamante, Inc.			Brochure to Aging Services in large print in English
Other (specify): Churches	Area Churches bulletins apartment rental info in English	AME Monthly Community information sheet in English		Church bulletin translated in Korean at Korean Service		Flyer will be posted at ABC Church & translated in sign language during deaf services.

STILL HAVE QUESTIONS?

Please contact Nancy Peterson (Pete) with the Iowa Finance Authority if you have questions regarding your plan or need information on how to obtain demographic information. We want to assist you in achieving meaningful plans.

800#: 800-432-7230

Phone: 515-725-4900

Direct Line: 515-725-1295

Email: nancy.peterson@iowa.gov