

LIHTC/HOME/HTF/WH Program Affirmative Fair Housing Marketing (AFHM) Plan

1a. Project Information:

Name:				
County:				
Address:				
City:		State:		Zip Code:

1b. Contract Number:		1c. Number of Units:		1d. Census Tract:	
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1e. Housing/Expanded Housing Market Area:	
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1f. Managing Agent Information:

Name:				
Address:				
City:		State:		Zip Code:

Telephone Number:		Email Address:	
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1g. Applicant/Owner/Developer Information:

Name:				
Address:				
City:		State:		Zip Code:

Telephone Number:		Email Address:	
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1h. Entity Responsible for Marketing (check all that apply):	☐ Owner	☐ Agent	☐ Other (specify)	
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Position:		Name (if Known):		
Address:				
City:		State:		Zip Code:

Telephone Number:		Email Address:	
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1i. To whom should approval and other correspondence concerning this AFHM be sent?

Name:				
Address:				
City:		State:		Zip Code:

Telephone Number:		Email Address:	
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2a. Affirmative Marketing Plan (check all that apply):

☐ Initial Plan / Date: ☐ Updated Plan / Date:

Reason(s) for current update:

2b. Occupancy of the Project (check all that apply):

☐ Elderly ☐ Family ☐ Mixed (Elderly/Disabled) ☐ Disabled ☐ Other (specify):

2c. Date of Initial Occupancy:**Advertising Start Date:**

(Advertising should begin at least 90 days prior to initial occupancy)

Date Prior to Initial Occupancy:

☐ To add to waiting list which currently has individuals

☐ To reopen waiting list which currently has individuals

3a. Demographics of Project and Marketing Area (complete and submit Worksheet 1).**3b. Targeted Marketing Activity:**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are least likely to apply for the housing without special outreach efforts.

☐ White ☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American
☐ Native Hawaiian or Other Pacific Islander ☐ Hispanic or Latino ☐ Persons with Disabilities
☐ Families with Children ☐ Other ethnic group, religion, etc. (specify):

4a. Proposed Marketing Activities: Community Contacts

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4b. Proposed Marketing Activities: Methods of Advertising

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach samples of advertisements, radio and television scripts, internet advertisements and websites, brochures, etc.

5a. Fair Housing Poster:

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24CFR 200.620 (e)). Check below all locations when the AFHM will be displayed.

(Check all that apply)

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☐ Other (specify):

5b. Affirmative Fair Housing Marketing (AFHM) Plan:

The AFHM must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHM will be made available.

(Check all that apply)

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☐ Other (specify):

5c. Project Site Sign:

All Project Site Signs should include the Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed.

(Check all that apply)

☐ Rental Office ☐ Real Estate Office ☐ Model Unit ☐ Other (specify):

The size of the Project sign will be:

The Equal Housing Opportunity logo or slogan or statement will be:

6. Evaluation of Marketing Activities:

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting the group(s) least likely to apply, how often you will make determination, and how you will make the decisions about future marketing based on the evaluation process.

7a. Marketing Staff:

What staff positions are/will be responsible for affirmative marketing?

7b. Staff Training and Assessment: AFHM

(1) Has staff been trained on the AFHM? ☐ Yes ☐ No

(2) Is there ongoing training on the AFHM and Fair Housing Act issues in general? ☐ Yes ☐ No

(3) If yes, who provides it?

(4) Do you periodically assess staff skills, including their understanding of the AFHM and their responsibilities to use it?

☐ Yes ☐ No

(5) If yes, how and how often?

7c. Tenant Selection Training/Staff:

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?

☐ Yes ☐ No

- (2) What staff positions are/will be responsible for tenant selection?

7d. Staff Instruction/Training: Samples and Dates

Please provide samples of Affirmative Marketing/Fair Housing training if any, provided/to be provided, to whom it was/will be provided, and dates of past and anticipated training.

8. Additional Considerations:

Is there anything else you would like to tell us about your AFHM in order to ensure that your program is marketed to those least likely to apply for the units and/or to be housed in them? Please attach additional sheets, as needed.

9. Review and Update:

By signing this form, the applicant/respondent agrees to review its AFHM at least once every 5 years throughout the life of the mortgage and/or the affordability period and to update it as needed in order to ensure continued compliance. I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Signature of person submitting this Plan: _____ Date: _____

Name (type or print):

Title & Name of Company:

IHFA Use Only: Reviewing Official

Signature of reviewing official: _____ Date: _____

Title: _____

Purpose of Form: All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing (AFHM) Plan Form as specified in 24 CFR 200.625, and in accordance with the requirements in (24 CFR 200.620). The purpose of the AFHM is to help applicants in developing an AFHM program to achieve a condition in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status. The AFHM helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy in the housing project (See AFHM, Block 3b).

An Affirmative Marketing program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHM, once approved by the Idaho Housing and Finance Association (IHFA), must be available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without IHFA approval. This form contains no questions of a confidential nature.

Applicability: The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing projects.

INSTRUCTIONS

Send completed forms and worksheets to: Idaho Housing and Finance Association, P.O. Box 7899, Boise, Idaho 83707-1899. **Attention:** Manager, Housing Compliance and Program Support.

Part 1 - Applicant/Respondent and Project Identification.

Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d – Respondents may obtain the Census tract number from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (www.census.gov).

Block 1e – A *housing market area* is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants.

If a housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability or familial status, an *expanded housing market area* may be used. An expanded housing market area is a larger geographic area that may provide additional diversity. Respondents should indicate the housing is/will be located, e.g., “City of _____” for housing market area, or “City of _____” and “County of _____” for expanded housing market area.

Block 1f – The applicant should complete this Block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHM.

Part 2 – Type of AFHM

Block 2a – Respondents should indicate the status of the AFHM, e.g., initial or updated, as well as the date of the AFHM. Respondents should also provide the reasons(s) for the current update, if applicable, whether the update is based on the five-year review or mid-term revisions due to changes in local demographics or other conditions.

Block 2b – Respondents should identify all groups IHFA has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c – Respondents should specify the date the project was/will be first occupied.

Block 2d – Respondents should indicate when this revised advertising began or will begin and whether the advertising will be used to add to and/or reopen the waiting list. (**NOTE: Advertising should begin at least 90 days prior to initial occupancy**). In the case of existing projects, respondents should also specify how many individuals were or are on the waiting list at the time the advertising began or will begin.

Part 3 – Demographics and Marketing Area.

“Least likely to apply” means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying can include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a – Using Worksheet 1, the respondent should indicate the demographic composition of the project, waiting list, census tract, and housing market area. The respondent compares the demographics of its existing project, waiting list (or any maintained list of interested housing applicants), with the demographics of the census tract and the larger housing market area to determine if there needs to be affirmative marketing to those least likely to apply. If the housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability, or familial status, an expanded market area should be designated to enhance the diversity of individuals applying for housing opportunities. The applicable housing market area or expanded marketing area should be shown in Block 1e. Wherever possible, demographic statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (www.census.gov).

Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area, i.e., those group(s) “least likely to apply” for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under “Other.”

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts.

Part 4 – Marketing Program

Block 4a - Using Worksheet 3, respondents should describe their use of community contacts to market the project to those least likely to apply. This table should include the name of the contact person, his/her address, phone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in implementing the AFHM.

Block 4b – Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, percentage of the readers/listeners/users/members/etc. who are members of the targeted population(s), language(s), into which the material(s) will be translated, alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size).

Part 5 – Availability of the Fair Housing Poster, AFHM, and Project Site Sign.

Block 5a – The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b – The AFHM must be available for public inspection at the sales or rental office (24 CFR 200.625). Respondents should indicate all locations where the AFHM will be available.

Block 5c – The Project Site Sign should display the Equal Housing Opportunity logo or slogan or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan or statement.

Part 6 – Evaluation of Marketing Activities.

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those groups identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

Part 7 – Marketing Staff and Training.

Block 7a – Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b – Respondents should indicate whether staff has been trained on the use of the AFHM and specify whether there is ongoing training on the AFHM and Fair Housing Act issues in general. Show who provides the training. In addition, respondents should specify whether they periodically assess staff members' skills in relation to the AFHM and staff responsibilities to use the Plan. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c – Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those positions that are/will be responsible for tenant selection.

Block 7d – Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

Part 8 – Additional Considerations.

Respondents should describe their efforts not previously mentioned that were/are planned to attract those groups least likely to apply for the subject housing without special outreach efforts.

Part 9 – Review and Update.

By signing, the respondent assumes responsibility for implementing the AFHM, and for reviewing and updating the Plan at least once every 5 years, and more frequently if local conditions or project demographics significantly change. IHFA may monitor the implementation of this AFHM at any time, and may also request modification in its format and/or content, when deemed necessary. Respondents should notify IHFA if they plan revisions to the AFHM marketing strategy after IHFA approval has occurred.

Notification of intent to Begin Marketing for initial Occupancy. No later than 90 days prior to the initiation of rental market activities, the respondent with an approved AFHM must submit notification of intent to begin marketing. The notification is required by the AFHM Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Idaho Housing and Finance Association, P.O. Box 7899, Boise, Idaho 83707-1899. **Attention:** Manager, Housing Compliance, and Program Support. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, IHFA will review any previously approved plan and may schedule a pre-occupancy conference. Such pre-occupancy conference will be held prior to initiation of rental marketing activities. At this conference, the previously approved AFHM will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the affirmative marketing regulation and the plan.

Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities
(See AFHM, Block 3b)

In the respective columns below indicate the percentage of each demographic group for the project (if occupied), waiting list (for existing projects), census tract, housing market area, and expanded housing market area (if the latter is needed to create a more diverse housing market area in terms of race, color, national origin, religion, sex disability, or familial status).

Wherever possible, statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (<http://www.census.gov/>).

If there is a significant under-representation of any demographic group in the project and/or on its waiting list relative to the surrounding housing market area, then those group(s) that are under-represented will be considered “least likely to apply” without targeted outreach and marketing, and will be so identified in block 3b of the AFHM. See Part 3 of the Form IHFA-935.2A Instructions for further guidance.

Maps showing both the Housing Market Area and expanded Housing Market Area should also be attached.

Demographic Characteristics	Project %	Waiting List %	Census Tract %	Housing Market Area %	Expanded Housing Market Area %
White					
American Indian or Alaskan Native					
Asian					
Black or African American					
Native Hawaiian or Other Pacific Islander					
Hispanic or Latino					
Persons with Disabilities					
Families with Children					
Other					

Worksheet 3: Proposed Marketing Activities – Community Contacts (See AFHM, 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 group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses and phone 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 marketing program.

Targeted Population(s)	Community Contact(s), Including required information

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

Complete the following table by identifying your targeted marketing population(s), 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. 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.

Targeted Population(s)  Methods of Advertising 	Targeted Population:	Targeted Population:	Targeted Population:
Newspaper			
Radio Stations			
TV Stations			
Electronic Media (e.g., internet advertisements, websites, etc.)			
Bulletin Boards			
Brochures, Notices, Flyers			
Other (specify)			