

Affirmative Fair Housing Marketing (AFHM) Plan Multifamily Housing Package

Version 2.0 – June 23, 2009

A package to assist you in the completion of the Affirmative Fair Housing Marketing (AFHM) Plan - Multifamily Housing form HUD-935.2A.

Please remember: It is your responsibility to “affirmatively further fair housing”. The process is on-going, and we expect it to be pursued with due diligence. You must be vigilant in assessing and remaining in contact with agencies (old/new/expired) that are able to reach the least likely to apply target groups, irrespective of the status of your waiting lists.

Included:

- [Form HUD-935.2A](#): Form-fillable and enabled so you can save your information when using Adobe Reader 9.0.
- [The Checklist](#): A list of reminders and required attachments. Before you submit, please use this checklist to ensure your submission is complete.
- [Information: Common Mistakes, Instructions, and References](#): Instructions from the form and Handbook 8025.1 and experience in one place.
- [4c Closed Waiting Lists Community Contacts Memo Sample](#): Only applicable if your waiting lists are closed. You are required to contact at least yearly agencies that represent groups least likely to apply, even though your waiting lists are closed. Use to construct your community contacts memorandum to satisfy Part 4c. Please cut and paste into your letterhead and date and sign. The sample is also available in Microsoft Word.
- [4c Group Home Community Contacts Memo Sample](#): Only applicable for group homes that have closed referrals. Use to construct your community contacts memorandum to satisfy Part 4c. Please cut and paste into your letterhead and date and sign. Please send to your referral agencies. The sample is also available in Microsoft Word.
- [6b Training Memo Samples](#): Use one of these to construct your training memorandum to satisfy Part 6b. Please cut and paste into your letterhead and date and sign. The samples are also available in Microsoft Word.
- [6b Instructions Memo Sample](#): Use to construct your instructions memorandum to satisfy Part 6b. Please cut and paste into your letterhead and date and sign. The sample is also available in Microsoft Word.

Group Home information: The majority of group homes do not advertise (marketing). Their outreach is limited. Their tenants are referred from other agencies. This is called "Closed Referrals". If this describes your group home, please refer to these instructions for Parts 4a and 4c:

- Please enter “Closed Referrals” in Part 4a.
- The [Group Home Community Contacts Memo](#) (Part 4c) needs to be on your letterhead, dated, and signed. The memo must be sent to all of your referral agencies, just as it is required for other properties. It is important your agency and the referral agencies are clear on fair housing requirements.

The Checklist

Before you submit, please use this checklist to ensure your submission is complete.

Please label attachments with their corresponding Part and Block identification: 4a, 4b,

Part 3, Part 4a, and Part 4c are related and demonstrate your outreach efforts to groups least likely to apply.

Are the groups least likely to apply (3) represented by your marketing program (4a) and community contacts (4c)?

Please sign and date the form.

Please include the following attachments:

Copies of newspaper advertisements and publications (4a). Please ensure the copies include the name of the newspaper/publication and the date of publication.

The only exception to this would be a group home with Closed Referrals.

Copies of brochures, letters, and handouts (4b(1)), if applicable.

Photograph of development site sign (4b(2)).

Please include a comment in Part 7 of the form if there isn't a development site sign.

Community Contact letters (on letterhead, dated, and signed) (4c). Please submit a letter for each community contact listed.

Training Memorandum (on letterhead, dated, and signed) (6b).

Instructions Memorandum (on letterhead, dated, and signed) (6b).

Affirmative Fair Housing Marketing (AFHM) Plan - Multifamily Housing

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

Check Fields

OMB Approval No. 2529-0013
(exp. 1/31/2010)

1a. Applicant's Name, Address (including City, State & Zip code) & Phone Number	1c. Project/Contract Number	1d. Number of Units
	1e. Rental Range From \$ _____ To \$ _____	1f. Type of Housing <input type="checkbox"/> Elderly <input type="checkbox"/> Family <input type="checkbox"/> Mixed (Elderly/Disabled)
	1g. Approximate Starting Dates (mm/dd/yyyy) Advertising _____ Occupancy _____	

1b. Development's Name, Location (including City, State and Zip code)	1h. Housing Market Area	1i. Census Tract
	1j. Managing Agent's Name & Address (including City, State and Zip Code)	

<p>2. Type of Affirmative Marketing Area (check all that apply)</p> <p>a. Plan <input type="checkbox"/> New <input type="checkbox"/> Update</p> <p>Reason for Update: _____</p> <p>b. Area</p> <p><input type="checkbox"/> White (non-minority) Area <input type="checkbox"/> Minority Area</p> <p><input type="checkbox"/> Mixed Area (with _____ % minority residents)</p>	<p>3. Direction of Marketing Activity (Indicate which group(s) in the housing market area are <u>least</u> likely to apply for the housing because of its location and other factors without special outreach efforts)</p> <p><input type="checkbox"/> White <input type="checkbox"/> American Indian or Alaskan Native <input type="checkbox"/> Asian</p> <p><input type="checkbox"/> Black or African American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander</p> <p><input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Persons with Disabilities <input type="checkbox"/> Families with Children</p> <p><input type="checkbox"/> Other _____ Specify _____ (e.g. specific ethnic group, religion)</p>
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4a. Marketing Program: Commercial Media (Check the type of media to be used to advertise the availability of this housing) **Group Home Instructions**

Newspapers/Publications Radio TV Billboards Other (specify) _____

Name of Newspaper, Radio or TV Station	Group Identification of Readers/Audience	Size/Duration of Advertising

4b. Marketing Program: Brochures, Signs, and HUD's Fair Housing Poster

(1) Will brochures, letters, or handouts be used to advertise? Yes No If "Yes", attach a copy or submit when available.

(2) For development site sign, indicate sign size _____ x _____; Logo type size _____ x _____. Attach a photograph of sign or submit when available.

(3) HUD's Fair Housing Poster must be conspicuously displayed wherever sales/rentals and showings take place. Fair Housing Posters will be displayed in the Rental Office Real Estate Office Model Unit Other (specify) _____



4c. **Marketing Program: Community Contacts.** To further inform the group(s) least likely to apply about the availability of the housing, the applicant agrees to establish and maintain contact with the groups/organizations listed below which are located in the housing market area. If more space is needed, attach an additional sheet. Notify HUD-Housing of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information.)

Group Home Instructions		Group Identification	Approximate Date (mm/dd/yyyy)	Person Contacted (or to be Contacted)
Closed Waiting Lists Memo Sample				
Name of Group/Organization				
Address & Phone Number		Method of Contact		Indicate the specific function the Group/Organization will undertake in implementing the marketing program

5. **Future marketing Activities** Mark the box(es) that best describe marketing activities to fill vacancies as they occur after the project has been initially occupied.

Newspapers/Publications Radio Community Contacts
 Brochures/Leaflets/Handouts TV Other (Specify)
 Site Signs

6. **Experience and Staff Instructions** (See instructions)

6a. Staff has affirmative marketing experience. No Yes

6b. On separate sheets, indicate training to be provided to staff on Federal, State and local fair housing laws and regulations, as well as this AFHM Plan. Attach a copy of the instructions to staff regarding fair housing.

7. **Additional Considerations** Attach additional sheets as needed.

8. **Review and Update** By signing this form, the applicant agrees to review their AFHM Plan at least every 5 years and update as needed to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (24 CFR 200.620).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print)

Title & Name of Company

For HUD-Office of Housing Use Only	For HUD-Office of Fair Housing and Equal Opportunity Use Only
Reviewing Official:	Approved _____ Disapproved _____ (Check One)
Signature & Date (mm/dd/yyyy)	Signature & Date (mm/dd/yyyy)
Name (type or print)	Name (type or print)
Title	Title

Print Form

Clear All Data

Save Data

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

In General: The Affirmative Fair Housing Marketing (AFHM) Plan is used to ensure that insured and subsidized multifamily housing projects are taking necessary steps to eliminate discriminatory practices and to overcome the effects of past discrimination involving Federally insured and subsidized housing. No application for any housing project insured or subsidized under the Department of Housing and Urban Development's (HUD) housing programs shall be funded without a HUD approved AFHM Plan (See the "Applicability" section in the instructions below.) Multifamily housing projects must have an updated AFHM Plan in effect for the life of HUD's mortgage insurance. The responses are required to obtain or retain benefits under the Fair Housing Act, Section 808(e)(5) & (6) and 24 CFR Part 200, Subpart M. The form contains no questions of a confidential nature.

Applicability: This form is to be completed by all insured or subsidized: multifamily housing projects.

Each applicant is required to carry out an affirmative program to attract prospective tenants of all minority and non-minority groups in the housing market area regardless of their race, color, religion, sex, national origin, disability or familial status, (24 CFR 200.620). Racial groups include White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. Other groups in the housing market area who may be subject to housing discrimination include, but are not limited to, Hispanic or Latino, persons with disabilities, families with children, or persons with different religious affiliations. The applicant shall describe in the AFHM Plan the proposed activities to be carried out during advance marketing, where applicable, and during all rent ups. The affirmative marketing program also should ensure that any group(s) of persons ordinarily **not** likely to apply for this housing without special outreach (See Part 3), know about the housing, feel welcome to apply, and have the opportunity to rent.

INSTRUCTIONS

Send completed form to: your local HUD Office
Attention: Director, Office of Housing

Part 1-Applicant and Project Identification.

Blocks 1a thru 1f-Self-Explanatory. Block 1g-the applicant should specify the approximate date for starting the marketing activities and the anticipated date of initial occupancy (if unoccupied). Block 1h-the applicant should indicate the housing market area, in which the housing will be (is) located. Block 1i - the applicant may obtain census tract location information from local planning agencies, public libraries and other sources of census data. Block 1j the applicant should complete only if a Managing Agent (the agent can not be the applicant) is implementing the AFHM Plan.

Part 2-Type of Affirmative Marketing Plan:

Applicants for multifamily housing projects should indicate the status of the AFHM Plan, e.g. new or

update. Please provide the reason for the current update. (Section 7 may be used if additional space is needed.) The AFHM Plan should also indicate the approximate racial composition of the housing/market area in which the housing will be (is) located by checking one of the three choices.

Part 3-Direction of Marketing Activity. Indicate which group(s) the applicant believes are least likely to apply for this housing without special outreach. Consider factors such as rent for housing, sponsorship of housing, racial/ethnic characteristics of housing market area in which housing will be (is) located, disability, familial status, or religious affiliation of eligible population, public transportation routes, etc.

Part 4-Marketing Program. The applicant shall describe the marketing program to be used to attract all segments of the eligible population, especially those groups designated in Part 3 of this AFHM Plan present in the housing marketing area that are least likely to apply. The applicant shall state: the type of media to be used, the names of

newspaper/call letters of radio or TV stations; the identity of the circulation or audience of the media identified in the AFHM Plan (e.g., White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, persons with disabilities, families with children, and religious affiliation), and the size or duration of newspaper advertising or length and frequency of broadcast advertising. Community contacts include individuals or organizations that are well known in the housing market area or the locality that can influence persons within groups considered least likely to apply. Such contacts may include, but need not be limited to: neighborhood, minority and women's organizations, grass roots faith-based or other community based organizations, labor unions, employers, public and private agencies, disability advocates, schools and individuals who are connected with these organizations and/or are well-known in the community. Applicants should notify their local HUD–Office of Housing of any changes to the list in Part 4c of this AFHM Plan.

Part 5-Future Marketing Activities. Self-Explanatory.

Part 6-Experience and Staff Instructions.

- 6a. The applicant should indicate whether he/she has had previous experience in marketing housing to group(s) identified as least likely to apply for the housing.

- 6b. Describe the instructions and training provided or to be provided to rental staff. This guidance to staff must include information regarding Federal, State and local fair housing laws and this AFHM Plan.

Copies of any written materials should be submitted with the AFHM Plan, if such materials are available.

Part 7-Additional Considerations. In this section describe other efforts not previously mentioned which are planned to attract persons least likely to apply for the housing

Part 8-Review and Update. By signing, the applicant assumes full responsibility for

implementing the AFHM Plan, and for reviewing and updating the Plan at least every 5 years. HUD may monitor the implementation of this AFHM Plan at any time and request modification in its format or content, where deemed necessary.

Notice of Intent to Begin Marketing. No later than 90 days prior to the initiation of rental marketing activities, the applicant with an approved AFHM Plan shall submit notice of intent to begin marketing. The notification is required by the Affirmative Fair Housing Marketing Plan Compliance Regulations (24 CFR Part 108.15). It is submitted either orally or in writing to the Office of Housing in the appropriate HUD Office servicing the locality in which the proposed housing will be located.

OMB approval of the Affirmative Fair Housing Plan includes approval of this notification procedure as part of the AFHM Plan. The burden hours for such notification are included in the total designated for this AFHM Plan form.

Information: Common Mistakes, Instructions, and References

Form

The submitted Form is outdated.

Information

Please resubmit using form HUD-935.2A.

The Form can be found at <http://www.hud.gov/offices/adm/hudclips/forms/hud9a.cfm#group3>.

Please label attachments with their corresponding block identification: 4a, 4b,

Are the groups least likely to apply (3) represented by your marketing program (4a) and community contacts (4c)?

1a Applicant's Name, Address & Phone Number

Applicant's Name is incomplete.

Applicant's Address is incomplete.

Applicant's Phone Number is incomplete.

Applicant information is inconsistent with documentation on file.

Information

Please enter complete address (street, city, state, and zip code).

1b Development's Name and Location

Development's Name is incomplete.

Development's Location is incomplete.

Development information is inconsistent with documentation on file.

Information

Please enter complete address (street, city, state, and zip code).

1c Project/Contract Number

Project/Contract Number is incomplete.

Project/Contract Number is incorrect.

1d Number of Units

Number of Units is incomplete.

Number of Units is inconsistent with documentation on file.

1e Rental Range

Rental Range is incomplete.

Rental Range is incorrect.

Rental Range is inconsistent with documentation on file.

Information

Please enter current Contract Rent range.

1f Type of Housing

Type of Housing is incomplete.

Type of Housing is inconsistent with documentation on file.

1g Approximate Starting Dates

Approximate Starting Dates is incomplete.

Approximate Starting Dates is incorrect.

Information

For *new* AFHMPs:

- Advertising Starting Date: Either the date of the newspaper ads (4a), or the date of the Community Contact Letters (4c).
- Occupancy Starting Date: The anticipated occupancy date.

For *updated* AFHMPs:

- Advertising Starting Date: Either the date of the most recent newspaper ads (4a), or the date of the most recent Community Contact Letters (4c).
- Occupancy Starting Date: The original occupancy date, unless the property was rehabbed and a fresh lease-up is scheduled.

Form HUD-935.2A: The applicant should specify the approximate date for starting the marketing activities and the anticipated date of initial occupancy (if unoccupied).

1h Housing Market Area

Housing Marketing Area is incomplete.

Housing Marketing Area is incorrect.

Information

Please enter the County the development is located.

Form HUD-935.2A: The applicant should indicate the housing market area, in which the housing will be (is) located.

1i Census Tract

Census Tract is incomplete.

Census Tract is incorrect.

Information

Census tracts are small, relatively permanent statistical subdivisions of a county. Census tracts are delineated for most metropolitan areas (MA's) and other densely populated counties by local census statistical areas committees following Census Bureau guidelines (more than 3,000 census tracts have been established in 221 counties outside MA's).

Examples of census tracts: 996200 (or 9962.00), 960100 (or 9601.00), 963100 (or 9631.00).

Form HUD-935.2A: The applicant may obtain census tract location information from local planning agencies, public libraries and other sources of census data.

Sources for Census Tract data:

<http://www.ffiec.gov/Geocode/default.aspx>

<http://www.census.gov/>

Click on American FactFinder

Click on Data Sets

Click on Detailed Tables

Click on Address Search

1j Managing Agent's Name and Address

Management Agent Name is incomplete.

Management Agent Address is incomplete.

Information

Please include complete address (street, city, state, and zip code).

Form HUD-935.2A: The applicant should complete *only if* a Managing Agent (the agent can not be the applicant) is implementing the AFHM Plan.

2a Type of Affirmative Marketing Plan and Reason for Update

Type of Affirmative Marketing Plan is incomplete.

Information

Form HUD-935.2A: Applicants for multifamily housing projects should indicate the status of the AFHM Plan, e.g. new or update.

Reason for Update is incomplete.

Information

Form HUD-935.2A: If an update, please provide the reason for the current update. (Section 7 may be used if additional space is needed.)

2b Type of Affirmative Marketing Area

Type of Affirmative Marketing Area is incomplete.

Information

Form HUD-935.2A: The AFHM Plan should also indicate the approximate racial composition of the housing/market area in which the housing will be (is) located by checking one of the three choices:

- White (non-minority) Area
- Minority Area
- Mixed Area (with _____ % minority residents)

3 Direction of Marketing Activity

Direction of Marketing Activity is incomplete.

Information

Form HUD-935.2A: Indicate which group(s) the applicant believes are **least likely to apply** for this housing **without special outreach**. Consider factors such as rent for housing, sponsorship of housing, racial/ethnic characteristics of housing market area in which housing will be (is) located, disability, familial status, or religious affiliation of eligible population, public transportation routes, etc.

Handbook 8025.1, Section 2-8: *If the applicant believes that no single group will need special outreach, the applicant shall indicate in the Plan and explain the reasons for such determination.* (Please enter reasons in Section 7.)

Handbook 8025.1, Section 2-8: In determining which groups may require special outreach, the applicant should consider the following factors:

- A. Practices or Policies of Discrimination
- B. Language Barriers
- C. Racial/Ethnic Composition
- D. Income Eligibility Requirements Vary According to Each Program
- E. Marketing to Individuals with Handicaps.

For a detailed discussion of these factors, please see Handbook 8025.1, Section 2-8, DIRECTION OF MARKETING ACTIVITY (PART 3 OF THE PLAN).

4a Marketing Program: Commercial Media

Copies of advertising are not attached.

Copies of advertising do not contain the name of paper and date of publication.

Information

Group Home information: The majority of group homes do not advertise (marketing). Their outreach is limited. Their tenants are referred from other agencies. This is called "Closed Referrals". If this describes your group home, please enter "Closed Referrals".

Form HUD-935.2A: The applicant shall describe the marketing program* to be used to attract all segments of the eligible population, **especially those groups designated in Part 3 of this AFHM Plan** present in the housing marketing area that are least likely to apply.

The applicant shall state:

- the type of media to be used;
- the names of newspaper/call letters of radio or TV stations;
- the **identity of the circulation or audience** of the media identified in the AFHM Plan (e.g., White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, persons with disabilities, families with children, and religious affiliation);
- the size or duration of newspaper advertising** or length and frequency of broadcast advertising.

Handbook 8025.1, Section 2-9: All advertising should be consistent with the Fair Housing Advertising Regulations (24 CFR 109)*** and the Fair Housing Act Regulations at 24 CFR 100.75. (See Appendix 9 for examples of use of commercial media.)

Handbook 8025.1, Section 2-9: *If the applicant does not intend to use any commercial media, the Plan should indicate the reasons for not using such media.*

* Handbook 8025.1, Section 2-9: Use of Minority-Owned Media. Applicants are encouraged to use minority-owned media as part of their overall marketing program to publicize the housing to all segments of the eligible population within the housing market area. Where Blacks, Hispanics, and other racial/ethnic minority groups have been identified as special outreach groups, minority-owned media may be a particularly effective outreach mechanism. Whenever such groups are not being specifically targeted for special outreach efforts, the use of minority-owned media is recommended as part of the outreach to the general population.

** Handbook 8025.1, Section 2-9: If copies of such advertising are available, the applicant shall submit them to the Field Office FHEO Division with the Plan. If no copies are available at the time the Plan is being prepared, the applicant shall submit them as soon as possible after the Plan has been approved.

*** PART 109--FAIR HOUSING ADVERTISING is available at: <http://www.hud.gov/offices/fheo/library/index.cfm>

*** Equal Housing Opportunity Graphics for Printing is available at:
<http://www.hud.gov/library/bookshelf11/hudgraphics/fheologo.cfm>

4b Marketing Program: Brochures, Signs, and HUD's Fair Housing Poster

4b (1) Brochures are not attached.

4b (2) Project sign size is incomplete. Logo type size is incomplete.

4b (2) Photo of project sign is not attached.

4b (3) HUD's Fair Housing Poster is incomplete.

Information

Handbook 8025.1, Section 2-9:

Brochures. The applicant should consider using brochures as part of the total marketing program. Brochures can be tailored to meet the specific housing needs of those persons who are members of groups identified as least likely to apply for the housing. The brochure can also contain a greater quantity of information about the project or subdivision than that contained in the "mass" media advertising (e.g., newspapers, radio or television). (For more information about Brochures, please see Handbook 8025.1, Section 2-9, THE MARKETING PROGRAM (PART 4 OF THE PLAN).)

Signs. The applicant must indicate the size of any existing or proposed permanent project site sign. The sign must include the Equal Housing Opportunity Logotype, and indicate the size of the logotype. A photograph of the project sign must be submitted with the AFHM Plan, or as soon as possible after erection of the sign.

Fair Housing Poster*. HUD's Fair Housing Poster must be conspicuously displayed wherever sales/rentals and showings take place. The applicant must indicate whether the poster will be displayed in the sales/rental office(s), the real estate office(s), model units and/or any other places.

* To download the poster (.pdf): <http://www.hud.gov/offices/ftheo/library/index.cfm>

* To order the poster: <http://www.hud.gov/offices/adm/dds/index.cfm>

4c Marketing Program: Community Contacts

Copies of correspondence are not attached.

Copies of correspondence must be submitted on letterhead, signed, and dated.

Copies of correspondence are older than 90 days.

Information

Please submit a letter for each community contact listed.

Group Home information: The majority of group homes do not advertise (marketing). Their outreach is limited. Their tenants are referred from other agencies. This is called "Closed Referrals". If this describes your group home, please use the Group Home Community Contacts Memo (enclosed and a sample is available as a MS Word (.doc) file). The Group Home Community Contacts Memo needs to be on your letterhead, dated, and signed. The letter must be sent to all of your referral agencies, just as it is required for other properties. It is important your agency and the referral agencies are clear on fair housing requirements.

Form HUD-935.2A:

To further inform **the group(s) least likely to apply** about the availability of the housing, the applicant agrees to establish and maintain contact with groups/organizations which are located in the housing market area.

Community contacts include individuals or organizations that are well known in the housing market area or the locality that can influence persons **within groups considered least likely to apply**. Such contacts may include, but need not be limited to: neighborhood, minority and women's organizations, grass roots faith-based or other community based organizations, labor unions, employers, public and private agencies, disability advocates, schools and individuals who are connected with these organizations and/or are well known in the community. [For a more detailed list of Community Contacts, please see Handbook 8025.1, Section 2-9, THE MARKETING PROGRAM (PART 4 OF THE PLAN).]

If more space is needed, attach an additional sheet. Notify HUD-Housing of any changes in this list.

Please attach a copy of correspondence to be mailed to these groups/organizations.

5 Future Marketing Activities

Future Marketing Activities is incomplete.

6a Experience - Staff Has Affirmative Marketing Experience

Experience - Staff Has Affirmative Marketing Experience is incomplete.

Information

Form HUD-935.2A: The applicant should indicate whether he/she has had previous experience in marketing housing to group(s) identified as least likely to apply for the housing.

Handbook 8025.1, Section 2-13: The successful implementation of any affirmative marketing program depends in great measure upon the sensitivity of management and sales staff to the importance of conducting the marketing program in a nondiscriminatory manner.

6b Indicate Training and Staff Instructions

Training to be provided to staff on Federal, State and local fair housing laws and regulations, as well as this AFHM Plan is not attached.

Training information must be submitted on letterhead, signed, and dated.

Information

1

Samples are enclosed. Samples are also available as MS Word (.doc) files.

Form HUD-935.2A: On separate sheets, indicate training to be provided to staff on Federal, State and local fair housing laws and regulations, as well as this AFHM Plan.

Handbook 8025.1, Section 2-13: B. Applicant's Training Responsibilities. Applicants are responsible for instructing all employees and agents in writing and orally concerning nondiscrimination in housing. Each applicant should clearly identify the requirements of applicable local, state and Federal fair housing laws and executive orders which staff must follow. Paragraph 3-11 states the specific civil rights laws and authorities on which sales and management staff should be trained. Instructions regarding fair housing requirements and objectives should also be a continuing part of the agenda of staff meetings or other activities carried out for sales and rental staff.

Instructions to staff regarding fair housing is not attached.

Instructions must be submitted on letterhead, signed, and dated.

Information

2

Samples are enclosed. Samples are also available as MS Word (.doc) files.

Form HUD-935.2A: Attach a copy of the instructions to staff regarding fair housing.

Handbook 8025.1, Section 2-13: C. Submission of Material. The applicant shall submit as part of the Plan a copy of the instructions given to sub-management staff on fair housing concerns such as federal, state or local fair housing laws and the applicant's Affirmative Fair Housing Marketing Plan. The material shall also indicate the date established for conducting such training and the name and title of the person responsible for developing the fair housing training program.

7 Additional Considerations

Information

Please use this section to describe other efforts and to provide additional information. If more space is needed, attach an additional sheet.

Form HUD-935.2A: In this section describe other efforts not previously mentioned which are planned to attract persons least likely to apply for the housing.

8 Review and Update

Form is not signed and dated.

4c CLOSED WAITING LISTS COMMUNITY CONTACTS MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

Your Letterhead

Date

Community Contact (from 4c.) Address

Dear:

Property or Management Company Name provides housing for eligible, low income (*insert all that apply: elderly persons or families, handicapped/disabled individuals*).

We would appreciate you continuing to add our name to the list of resources you provide to your clientele.

If you have any questions or concerns about the services we provide, please feel free to contact *Name, Title, Phone/Email*.

Sincerely,

4c GROUP HOME COMMUNITY CONTACTS MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

(TO BE PLACED ON COMPANY LETTERHEAD)

ATTACHMENT A

MEMO

TO: Regional Director, Massachusetts Department of Mental Health
(To be sent to each Referral Agency listed in 4c. of AFHMP)

FROM: *(Sign or Initial)*

RE: Affirmative Fair Housing Marketing Plan-HUD-935.2A or B
_____ Subject Development's Name
HUD Project: 000-HD000 – City, State

DATE:

Please find attached a copy of the Affirmative Fair Housing marketing Plan, which HUD requires as part of our development process for the project undertaken by

_____ .

As you can see, it is critical that eligible applicants from all population groups in the development's housing market area have the same opportunity to apply for and to be considered and referred for residency in this development, regardless of race, color, religion, sex, national origin, familial status, or disability. The Department's procedures leading up to referrals to this development must provide for affirmative outreach to all eligible applicant groups within the housing market area, including the groups least likely to apply based on the development's location. (For a list of the groups least likely to apply, please see the attached Affirmative Fair Housing Marketing Plan.) The Department's application and referral process must be non-discriminatory. The Department must not use racially or ethnically conscious selection or referral procedures at any stage of its process in regard to this development.

If you have any questions, please contact _____ at 000-000-0000.

Note: This sample may be used verbatim, but you would need to make revisions where appropriate for your AFHMP.

6b TRAINING MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

6b. STAFF TRAINING

The owner will comply with all Federal, State and local fair housing and civil rights laws and with all Equal Opportunity requirements in HUD administrative procedures. In carrying out its marketing program and applicant selection process, neither the Owner, nor its Agents, will discriminate based on race, color, creed, familial status, religion, sex, sexual preference, national or ethnic origin, age, handicap, citizenship, ancestry, class or marital status, or any other basis prohibited by law. This applies to accepting and processing applications, selecting tenants from among eligible applicants of the waiting list, assigning units, and certifying and re-certifying eligibility for assistance.

All persons who will be handling and/or processing rental applications will be trained in procedures and policy matters, mindful of relevant federal, state and municipal orders, laws and statutes dealing with civil rights and fair housing. Marketing staff and all other persons involved in applicant processing will be familiarized with, and adhere to, the following regulations: Title VIII of the Civil Rights Acts of 1968, as amended by the Fair Housing Amendments Act of 1988; Title VI of the Civil Rights of 1964; Executive Order 11063, November 29, 1962; Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act; as well as comparable orders on the state level. Additionally, the appropriate complaint procedures will be explained so that applicants may avail themselves of that process if they feel discrimination has occurred. Marketing staff will receive training on the use and appropriate review of the paperwork and processing required in marketing the units.

6b TRAINING MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

6 .b. STAFF TRAINING

The owner will comply with all Federal, State and local fair housing and civil rights laws and with all Equal Opportunity requirements in HUD administrative procedures. In carrying out its marketing program and applicant selection process, neither the Owner, nor its Agents, will discriminate based on race, color, creed, familial status, religion, sex, sexual preference, national or ethnic origin, age, handicap, citizenship, ancestry, class or marital status, or any other basis prohibited by law. This applies to accepting and processing applications, selecting tenants from among eligible applicants of the waiting list, assigning units, and certifying and re-certifying eligibility for assistance.

All persons who will be handling and/or processing rental applications will be trained in procedures and policy matters, mindful of relevant federal, state and municipal orders, laws and statutes dealing with civil rights and fair housing. Marketing staff and all other persons involved in applicant processing will be familiarized with, and adhere to, the following regulations: Title VIII of the Civil Rights Acts of 1968, as amended by the Fair Housing Amendments Act of 1988; Title VI of the Civil Rights of 1964; Executive Order 11063, November 29, 1962; Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act; as well as comparable orders on the state level. Additionally, (all applicants will be made aware of -- deleted) the appropriate complaint procedures will be explained so that applicants may avail themselves of that (the correct – deleted) process if they feel discrimination has occurred. Marketing staff will receive training on the use and appropriate review of the paperwork and processing required in marketing the units.

6b TRAINING MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

6b. Staff Training

The XYZ Company complies with all Federal, State and local fair housing and civil rights laws and with all Equal Opportunity requirements in HUD administrative procedures. In carrying out its marketing program and resident selection process, neither the Owner, nor its Agents, will discriminate based on ***race, color**, creed, **religion, sex**, sexual preference, **national** or ethnic **origin**, age, **handicap**, citizenship, ancestry, class, marital status, **familial status**, or any other basis prohibited by law. This applies to accepting and processing applications, selecting tenants from among eligible applicants of the waiting list, assigning units, and certifying and re-certifying eligibility for assistance.

All persons who will be handling and/or processing rental applications will be trained in procedures and policy matters, mindful of relevant federal, state and municipal orders, laws and statutes dealing with civil rights and fair housing, the Marketing and Resident Selection Plans, applicable regulations governing the selection of applicants for housing, including, but not limited to: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988; Title VI of the Civil Rights Act of 1964; Executive Order 11063, November 29, 1962; The American with Disabilities Act, Section 504 of The Rehabilitation Act of 1973, and comparable orders on the state level. Marketing staff and all other persons involved in processing and/or handling of potential applications will be familiarized with the above regulations. Also, the appropriate appeal procedures will be explained so that applicants may exercise their rights if they feel discrimination has occurred.

Note: The ***emboldened** protected classes are the seven (7) that are relevant under federal fair housing law. The sample, however, is from an AFHM Plan that was submitted, and approved, where it also included the protected classes that are covered under its state fair housing law. Hence, the sample summary should be modified accordingly to suit the needs of your Plan.

6b TRAINING MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

6b. _____, INC. STAFF TRAINING SUMMARY

_____, Inc. complies with all Federal, State and local fair housing and civil rights laws and with all Equal Opportunity requirements in HUD administrative procedures. In carrying out its marketing program and resident selection process, neither the Owner, nor its Agents, will discriminate based on race, color, religion, sex, national or ethnic origin, handicap, familial status, or any other basis prohibited by law. This applies to accepting and processing applications, selecting tenants from among eligible applicants of the waiting list, assigning units, and certifying and re-certifying eligibility for assistance.

All persons who will be handling and/or processing rental applications will be trained in procedures and policy matters, mindful of relevant federal, state and municipal orders, laws and statutes dealing with civil rights and fair housing, this Marketing Plan, applicable regulations governing the selection of applicants for housing, including, but not limited to: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988; Title VI of the Civil Rights Act of 1964; Executive Order 11063, November 29, 1962; **Chapter 151B**, The American with Disabilities Act, Section 504 of The Rehabilitation Act of 1973, and comparable orders on the state level. Marketing staff and all other persons involved in processing and/or handling of potential applications will be familiarized with the above regulations. Also, the appropriate appeal procedures will be explained so that applicants may exercise their rights if they feel discrimination has occurred.

Staff with direct property management duties will receive the following training:

- Evictions and Landlord Tenant Law in Vermont
- Credit Report Training, Section 8 administration
- Fair Housing and Disabilities
- Fair Housing Law in Vermont
- Role of RSC in Lease Violation Process
- Non-Discrimination in Housing Services
- Conflict Management and Mediation Training

_____, Inc. will utilize training opportunities provided by the following agencies and organizations:

- National Affordable Housing Managers Association
- Vermont Housing Finance Agency
- Vermont Housing and Conservation Board
- Vermont State Housing Authority
- New England Resident Services Association

Note: Chapter 151B is reference to a law in Massachusetts:

<http://www.mass.gov/legis/laws/mgl/gl-151b-toc.htm>

6b INSTRUCTIONS MEMO SAMPLE

PLEASE PLACE ON YOUR LETTERHEAD AND SIGN AND DATE

(ON COMPANY LETTERHEAD)

Note: Company Letterheads should include applicable Fair Housing Logos and a TDD/TTY telephone number, if available)

MEMORANDUM

To: All Employees
From: _____, **(Title) (To be signed or initialled)**
Date: _____
Subject: Instructions **(or if applicable “Revised Instructions”)** for Complying with Local, State and Federal Fair Housing Laws Regarding the Rental of Housing Units.

“Affirmative marketing” is defined as (1) adherence to local, state and federal fair housing laws, and (2) positive efforts to ensure that a wide spectrum of persons from various races, colors, religions, genders, handicaps, national origins and familial statuses are made aware of our housing developments and their benefits.

It is the policy of this management company to ensure that all fair housing laws are observed by those who participate in the management and operation of our housing developments. Failure to comply with affirmative marketing provisions will subject you and me to sanctions authorized by law.

Marketing of multi-family housing by this management company, at a minimum, shall be in accordance with the Owner’s HUD- approved Affirmative Fair Housing Marketing Plan (attached), and their signed assurance of compliance with Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, Executive Order 11063 of 1962, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act of 1990 and the certifications required pursuant to Executive Order 11246.

In the marketing of units, this management company will adhere to the three following specific conditions:

1. All advertising, brochures, leaflets and other printed materials shall include the Equal Housing Opportunity Logo, statement or slogan.
2. All signs, off-site or on-site, will prominently display the logo, statement or slogan.
3. A fair housing poster will be displayed so as to be readily apparent to all persons seeking housing accommodations.

No applicant shall be refused the right to apply for housing. In the selection of residents, this management company will adhere to all regulations relating to fair housing. Our developments will be managed and operated without regard to race, color, religion, sex, national origin, familial status, disability, or as required by state law, without regard to creed, ancestry, sexual preference, or source of income.

(Note: applicable or non-applicable state-law protected classes can be added or deleted.)

From time to time, as fair housing laws are amended, this management company will revise and update its instructions to keep all employees current with any applicable equal housing opportunity regulations.

NOTE: Be sure to remove the ***emboldened/italicized instructions and/or choices***, before submitting your revision of this sample.

The Memo should then be issued to all applicable staff & employees