

Affirmative Fair Housing Marketing Plan Guide – TBRA and Homebuyer Only Programs

Introduction and Background

This guide was developed to assist anyone receiving non-multifamily HOME TBRA or Homebuyer funds without LIHTC to develop an Affirmative Fair Housing Marketing Plan (AFHMP) required by HUD.

The AFHMP should demonstrate meaningful efforts to identify and attract underserved populations in the housing market area, as underserved populations may not apply for housing without special outreach efforts.

HUD implemented AFHMPs to prevent redlining in communities (segregating race or ethnicity in defined housing areas). Properties need to make efforts beyond their normal or current advertising to directly reach and successfully attract underserved populations to increase diversity. The AFHMP should outline how the program will work to house both majority and minority populations represented in the housing market area to ensure that segregation/redlining does not intentionally occur.

The AFHMP regulations can be found at [24 CFR 200, subpart M](#). Additional Affirmative Marketing regulations for TBRA can be found at [24 CFR 92.351](#).

What is Affirmative Marketing?

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

The Iowa Finance Authority requires **all** properties to target Persons with Disabilities, regardless of percentages listed. Most locations in Iowa have a sufficient population which may be underserved and can be targeted.

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

- Establishing relationships with organizations, churches, agencies, or businesses in the community who work directly with an underserved population and can help you distribute information about your program.
- Advertising in minority or specialized publications to reach targeted populations i.e., magazine, newspaper, radio or television or relationships with organizations, churches, agencies, or businesses who work directly with an underserved population.
- Alternate advertising formats such as Braille, large print, audio formats, and/or language translation appropriate to the community.
- Periodically review the special marketing efforts and evaluate successes and failures to expand on your successes or make changes to improve the plan if needed.

Iowa HOME, NHTF, and LIHTC Programs

Projects that have received HUD funding are required to provide an AFHMP. For HOME TBRA or Homebuyer Programs, a new plan is required for each new contract.

In addition, Projects allocated Low-Income Housing Tax Credits (LIHTC) from 2009 forward are required to complete an AFHMP. If your project also receives LIHTC or is a multifamily project, use the guide for LIHTC programs found on the [IFA website](#) or email [IFA](#) for a copy. All programs follow the requirements at [24 CFR 200.620](#).

Housing Protected Classes

Federal: 24 CFR 100	State: Iowa Code 216
Color	Color
Disability	Creed
Familial Status	Familial Status
National Origin	Gender Identity
Race	Mental Disability
Religion	National Origin
Sex (including gender identity and sexual orientation)	Physical Disability
	Race
	Religion
	Sex
	Sexual Orientation

Additional HUD requirements and local protected classes may expand this list. If you have a question, please reach out to [IFA](#).

Which form do I use?

Reminder: if your project receives LIHTC or is a multifamily project, please use the LIHTC and multifamily guide.

The TBRA and Homebuyer programs have separate AFHMP forms to use. Contact Bern Beck at bernadette.beck@iowafinance.com if you need a copy of the form or assistance in choosing the right form for your project.

Getting Started

This guidance is specific to the IFA TBRA and Homebuyer forms and should not be used for a multifamily project or LIHTC project.

AFHMP HOME-TBRA and Homebuyer Forms

All sections of the form must be completed fully. There are differences in numbering as the Homebuyer AFHMP form does not require date of marketing plan, participating jurisdiction information, or tenant selection staff information but all other guidance remains the same. Numbers for the Homebuyer form, where different, are listed in **(blue)**.

You must use the appropriate form, but if you wish to create your own Word tables or Excel spreadsheets for Worksheets 1 and 2, this is allowable.

- 1. Applicant Name and Address:** please include city, state, and zip code of the program's primary address.
- 2. HOME project number:** This section should contain all contract project numbers associated with IFA and this project.
- 3. Target number of households/buyers assisted**
- 4. Date of this marketing plan (TBRA only):** use the date it was developed. A reminder that a new AFHMP is needed for every HOME contract, even if it is a continuation of a program.
- 5. Participating Jurisdiction (TBRA only):**
- 6. Phone number and email contact (TBRA only)** for the PJ.
- 7. (4) Person Responsible for the marketing plan and marketing oversight:** specific contact information for your program.

8. **(5) Marketing Target Area:** list the area(s) that attract the most applicants. This could be city/town, county, Metropolitan Statistical Area (MSA), or other. If your project serves multiple counties, list them all in the county section. A lookup of MSAs can be found [here](#).
9. **(6) Targeted Marketing Activity:** before completing this section, Worksheet 1, Determining Demographic Groups Least Likely to Apply, must be completed. Go to [Worksheet 1](#) in this document for assistance with Worksheet 1.
10. **(7) Marketing Program – Commercial Media:** attach to the completed AFHMP any brochures, ad copy, or additional marketing materials used for this program. Complete the table with information specific to how and where any ads will be run.
11. **(8) Marketing Program: Brochures and HUD Fair Housing Poster:** if brochures, letters, or handouts will be used to advertise the program, copies must be attached. Any materials should contain the HUD Equal Housing Opportunity (EHO) logo, statement, or slogan, linked [here](#). The HUD Fair Housing Poster must be conspicuously displayed and where the poster(s) location is displayed is to be included in this section.
12. **(9) AFHMP/Fair Housing Act Staff Instruction/Training:** following the instructions in this section, attach any training materials used and also include any information about who conducts the training/provided the training. Be sure to include past and upcoming dates of training for staff and the information about which staff received or will receive the training.
13. **(10) How will you annually assess the success of your Affirmative Marketing efforts?** This section should include any plan the program has to evaluate the actions taken for affirmative marketing on an annual basis.
14. **(11) What corrective action will be taken where the Affirmative Fair Housing efforts are not met?** This section should include any action the program will take if the annual assessment of the affirmative marketing shows that improvements are needed.
15. **Tenant Selection (TBRA only):** include which staff positions and names are or will be responsible for TBRA tenant rental assistance selection.
16. **(12) Additional Considerations:** include any other information about your AFHMP that does not fit elsewhere in the form.
17. **(13) Implementation and Review:** signature block and date for the person submitting the AFHMP and the IFA staff signing off on the AFHMP.

Tenant Selection Plan and Outreach Strategy (TBRA only)

Agencies offering TBRA must have a written description of how tenants will be selected for the TBRA program, called a Tenant Selection Plan (TSP). Agencies must also develop a marketing and outreach strategy that specifies how the program will be marketed, paying particular attention to fair housing issues and requirements.

Many programs already have written policies and procedures outlining what is required for TSP and Outreach. If your program has all this information in their Admin Plan, you do not need to complete a separate document for the TSP and Outreach Strategy, but instead can include your Admin Plan when submitting the AFHMP and note which parts apply to your TSP and Outreach Strategy.

Items that should be included in the TSP and Outreach Strategy are below.

Tenant Selection Plan:

- **Program Eligibility:** Describe how the special needs and/or disability status of households will be established. Special needs status may be verified and documented by the applicant or other applicable agency such as a homeless or domestic violence shelter, while disability status must be verified by a service agency such as a community mental health agency.
- **Preferences:** Describe any established local preferences and how they will be used.
- **Application Procedures:** Describe the waiting list that will be used. If a separate TBRA waiting list is established, please describe:
 - How the program will be announced. Opening and closing of waiting lists must be publicly announced.

A reminder that IFA requires **all** properties to target Persons with Disabilities, regardless of percentages listed. Most locations in Iowa have a sufficient population which may be underserved and can be targeted.

Pull the appropriate reports (DP05, DP02, and B11004) from the US Census Bureau [here](#). Only projects that serve or will serve families with children need to pull B11004.

For a step-by-step process, refer to [this link](#) from the US Census Bureau about how to pull and use these reports for completing an AFHMP.

1. Filter by geographical area using filters on the left side of the page. You can filter by city/town, county, MSA, or census tract (or all at the same time if your project requires that).
2. In the search bar, type the three report titles and hit enter or the search button.
3. Review the data in each of the reports to complete Worksheet 1.
 - a. DP05 contains race and ethnicity data.
 - b. DP02 contains disability information under “Total Civilian Noninstitutionalized Population with a disability”
 - c. B11004 contains families with children under 18 data. This table requires some additional calculation, as you will need to add the data in the rows titled “with related children of the householder under 18 years” for each household type (married-couple families, families with a male householder and no spouse present, and families with a female householder and no spouse present). After you add these together, divide the number by the total number found in row one. To get a percentage, multiply that final number by 100.

Even if the project has existing tenants, the analysis will be based solely on the Census Tract, Housing Market Area, and Expanded Housing Market Area, as each contract requires a new AFHMP. Evaluation of the current contract’s AFHMP should be completed during the contract period.

Once the percentages have been pulled from the US Census Data, enter the percentages into the demographic worksheet and analyze the data.

1. Determine the Majority Population: The highest percentage of all races or ethnicity in each geographical area represents the Majority Population. The majority usually does not need special outreach because general advertising methods and word of mouth generally reach this group. This group can be excluded from Worksheet 2 and Section 9 of the AFHMP form.
2. Evaluate the remaining demographic percentages using the following method of measurement:
 - a. IF 1% OR GREATER - Properties should attempt to target this underserved population and include them on Section 9 of the AFHMP form and Worksheet 2.
 - b. IF LESS THAN 1% - Programs should not target and include on Section 9 of the AFHMP form and Worksheet 2 unless you can explain why your program is able to reach this population and outreach is needed. Use Section 16 of the AFHMP form if you are choosing to include such a demographic group.
3. Always include persons with disabilities on Section 9 of the AFHMP form and Worksheet 2.

There are exceptions to the 1% measure. Potentially, an underserved population is known to exist in the housing area, yet the census data does not capture this demographic group, so they are not represented in the data. Your knowledge of the community should be considered for direct marketing opportunities. If this occurs, list the population under “other” and specify the underserved population.

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%.

Worksheet 2, Proposed Marketing Activity – Community Contacts

- List each targeted group separately on the worksheet and the corresponding community contact. If one agency/organization/business serves as the community contact for multiple targeted

groups or service area, list all targeted groups or service areas served by that community contact in Column 1. A sample Worksheet 2 is included [here](#) for assistance.

- Ensure you have contacted and discussed with all contacts how they can assist your property to attract targeted underserved populations. All community contacts should be known to effectively reach the targeted populations prior to including in the plan and using to market your program.
- Develop positive relationships and have continued communication with these contacts.

Marketing materials, public access, and staff training

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.

Equal Housing Opportunity (EHO) Advertising, Property Signs, and Public Access

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.

Property signs shall contain the [EHO logo, statement, or slogan](#) and should be visible to anyone viewing the sign. If the sign has not been constructed when the AFHMP is submitted, provide copy of the planned sign design and content prepared by the sign manufacturer or architect. If a site sign is not used, please explain.

Symbols of Accessibility

Accessible facilities which meet the Uniform Federal Accessibility Standards (UFAS) 4.1, Minimum Requirements, may use the international symbol of accessibility. Please ensure the property meets these requirements if the symbol is used. 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.

Instruction/Training

Employees engaged with HOME funded programs must be provided verbal and written training regarding policies of non-discrimination and fair housing, including the Fair Housing Act and Affirmative Fair Housing Marketing. Dates, content, and anticipated training should be tracked, and copies of training materials should be kept. Copies of training materials should be submitted with the AFHMP form, and Section 12 of the AFHMP form also asks for dates and content of training that staff received/will receive.

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.

Plan Maintenance

As annual review of the AFHMP for efficacy is required. IFA recommends that programs keep files to help you establish:

- How you determined what outreach was needed.
- What actions were taken.
- When actions were taken.
- Why decisions were made to change or expand efforts.

A Community Contact Journal is a good way to document all special outreach efforts. A sample journal is included in the appendix.

Additionally, to assist with marketing efforts, programs can ask tenants/applicants about how they heard about the program and for race and ethnicity information, if they are willing to provide it. If the tenant/applicant declines to provide it or the race/ethnicity of the tenant/applicant is unknown, HUD requires that this percentage be tracked as “unknown”.

Still Have Questions?

Please contact Bern Beck with IFA if you have questions regarding your plan.

800#: 800-432-7230

Direct Line: 515-452-0427

Email: bernadette.beck@iowafinance.com

Pulling US Census Data information

Access the guide provided by the US Census regarding AFHMP data [here](#).

Note that the US Census has updated reports and how they are pulled, and this may continue to change. If you have questions, please contact [Bern Beck](#).

To reduce the data for the DP05 report to be more manageable, enable editing on the downloaded document.

- Column A replace the heading LABEL by Typing in DP05 [YEAR USED] 5-year Estimates
- Delete Column B Sex & Age
- Delete Column C through Column BV
- Delete Column D through Column H
- Column A should be DP05 [YEAR USED] 5-year Estimates and lists County, Place, and Census Tract below.
- Column B should be Total Population
- Column C should be Hispanic or Latino (of any race)
- Column D should be White Alone
- Column E should be Black or African American Alone
- Column F should be American Indian and Alaska Native Alone
- Column G should be Asian Alone
- Column H should be Native Hawaiian and Other Pacific Islander Alone
- Delete Columns I through Q
- This provides you with the basic groups and percentages required on Worksheet 1 for Race & Ethnicity. It would be easiest to move all column headings to row 5, then delete rows 1-4 before printing the worksheet to a PDF.

Sample Forms Appendix

AFHMP Sample Worksheet 1

Sample table from Worksheet 1 as if completed for a new TBRA project that serves Black Hawk, Grundy, Buchanan, and Bremer Counties. ***Data not based in fact***

Demographic Characteristics	Black Hawk County	Grundy County	Buchanan County	Bremer County
% White	91%	97%	99%	99%
% Black or African American	8%	2%	0.9%	0.6%
% Hispanic or Latino	0.8%	0.9%	0.3%	0.4%
% Asian	0%	0%	0%	0%
% American Indian or Alaskan Native	0.4%	0.7%	0%	0%
% Native Hawaiian or Pacific Islander	0%	0%	0%	0%
% Persons with Disabilities	14%	3%	2%	3%
% Families with Children under the age of 18	26%	15%	12%	0.2%%
Other (specify)				

AFHMP Sample Worksheet 2

Based on the Sample Worksheet 1 above:

Worksheet 2: Proposed Marketing Activity – Community Contacts	
<p>For each targeted demographic group identified in Section 6:</p> <ul style="list-style-type: none"> Identify at least one community contact organization for every group checked you will use to facilitate outreach and identify group targeted. Provide name, full address, their telephone number, and email. Specify previous and on-going experience working with the group listed in the first column 	
Targeted Demographic Group(s) (one group per row based on Worksheet 1 and Section 6 checked demographic groups)	Community Contact(s) – Follow directions above.
Black/African American, Black Hawk County	<p>Organization/Company: Amani Community Services Contact Name and Title: Contact Person, Title Address: Street Address City, State, Zip: Waterloo, IA, 50107 Phone: 319-555-0000 Email: cperson@email.com Regularly refer to Amani, who provides culturally specific domestic violence/sexual assault programming for African Americans. They will provide information about our program to eligible survivors regularly.</p>
Families with children, all counties	<p>Organization/Company: Operation Threshold Contact Name and Title: Contact Person, Title Address: county offices in Black Hawk, Grundy, and Buchanan Counties City, State, Zip: Black Hawk, Grundy, and Buchanan Phone: 319-555-0001 Email: contactp@email.com They will keep our program brochures in their county offices and refer any families with children who are applying for WIC in their offices to our program as appropriate. WIC serves pregnant and postpartum lowans and children 0-5 by providing access to supplemental foods, health care referrals, and nutrition education.</p>
Persons with Disabilities, all counties	<p>Organization/Company: Iowa Vocational Rehabilitation Services Contact Name and Title: Contact Person, Title Address: Waterloo Office address City, State, Zip: Waterloo, IA, 50107 Phone: 319-555-0002 Email: contact.person@email.com IVRS will keep our program brochures in their offices and refer clients as appropriate. IVRS works to connect lowans with disabilities to suitable, stable employment.</p>

Community Contact Journal Sample

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 information may be helpful in evaluating your marketing activities for future activities and updates.

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

Describe the Organization:

Targeted Population:

Describe their experience working with this population and how they will assist you in reaching this population:

Will alternate format(s) be used? (Example: Braille, large print, language translation):
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 any copies of the advertising or marketing material(s) used.

