



Home Trust of Skagit

Affirmative Marketing Plan

Adopted by Home Trust of Skagit

Board of Directors

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Understanding Affirmative Marketing

Affirmative Fair Housing Marketing (AFHM) means to promote fair housing and to empower and give special assistance to groups that have historically been disadvantaged. It is simply not enough to not discriminate; we must also take assertive steps aimed at reversing historical trends and discriminatory patterns.

Home Trust of Skagit is committed to affirmatively furthering fair housing in all aspects of its operations. The AFHM plans are one part of that effort. The purpose of the AFHM requirement is to promote a condition in which individuals of similar income levels in the same housing market area have available to them a like range of choices in housing regardless of their race, religion, color, national origin, sex, disability or familial status.

Historically, traditional residential marketing practices have conditioned people to view certain neighborhoods or groups as undesirable or that certain locations are not available to them due to past discrimination or other factors. Through an affirmative marketing plan, a developer indicates what special efforts they will make to reach out to potential tenants who might not normally seek housing in their project due to this mindset. This requires Home Trust of Skagit study the market area, learn the target population and design methods to reach out to the target population.

Affirmative marketing does not limit choices; it expands choices by actively seeking to reverse the patterns of the past and truly provide for an open and fair housing market where the individual is free to live where they choose. Affirmative marketing does not include specific goals or quotas. However, quantitative data and analysis are essential to planning and monitoring affirmative marketing program effectiveness.

This manual summarizes Home Trust of Skagit plans and affirmative marketing procedures as required by Housing and Urban Development HOME-funded projects. It provides step by step instructions on how to effectively develop the marketing plan to ensure it has the greatest possible impact.

In furtherance of Home Trust of Skagit's commitment to non-discrimination and equal opportunity in housing and your commitment to affirmatively further fair housing, the following procedures are hereby established. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 11063. Home Trust of Skagit believes that individuals of similar economic levels in the same housing market area should have available to them a like range of housing choices regardless of their race, religion, color, national origin, sex, disability or familial status.

Affirmative Marketing Policy

Home Trust of Skagit is committed to the goals of Affirmative Marketing which will be implemented through the following procedures:

1. HOUSING DEVELOPMENT FUND DUTIES

Home Trust of Skagit shall apply these procedures to its own marketing efforts and will inform the public, potential tenants and owners about this policy through:

- a. Placement of a link to this policy on Home Trust's website.
- b. Providing technical assistance through training and written information to owners or developers of housing assisted through Home Trust's programs.
- c. Annually reviewing the marketing activities of recipients of Home Trust assistance to ensure compliance with the previously approved marketing plan.

2. RESPONSIBILITIES

The following requirements apply when Home Trust develops a multi-family project consisting of five or more units, and a single family home project of five or more units in the previous 12 month period OR who plan to develop five or more units within the following 12 months. Moreover, the requirements also apply to downpayment assistance-related developments. Home Trust requires the utilization of affirmative fair housing marketing practices in soliciting renters or buyers, determining their eligibility, and completing all transactions.

Home Trust must comply with the following requirements for the duration of the applicable compliance period.

a. **Advertising:** The Equal Housing Opportunity logo or slogan must be used in all signs, ads, brochures, and written communications. Advertising media may include, but is not limited to, any local newspaper, radio or television station, brochures, leaflets, bulletin boards, project signs or other housing organizations.

b. **Fair Housing Poster:** Home Trust of Skagit must display the HUD fair housing poster in all rental offices and locations where potential tenants may likely come to apply for housing.

c. **Project Sign:** Owners must post in a conspicuous position on all project sites a sign displaying prominently either the HUD approved Equal Housing Opportunity logo or slogan or statement.

d. **Submission of an Affirmative Fair Housing Marketing Plan:** Home Trust of Skagit shall submit a Form HUD-935.2A for multifamily projects or Form HUD-935.2B for single family projects. Refer to the Affirmative Fair Housing Marketing Plan Applicants Guide for detailed instructions regarding the submission of the plan.

e. **Training:** Home Trust must maintain a nondiscriminatory hiring policy and must at least annually instruct all employees and agents in writing and orally of this policy and in fair housing.

3. RECORD KEEPING

Owners must maintain a file at each project office which contains documentation of all marketing efforts (copies of newspaper ads, memos of phone calls, copies of letters, brochures, flyers etc). The marketing file must also include the approved Form HUD-935.2A or Form HUD-935.2B and the letter from the Fund that specified approval of the plan. These records must be available for inspection by HUD and/or its manager of HOME funded-projects upon request. These records must be retained for a period of five (5) years.

Home Trust of Skagit must maintain a listing of all tenants and applicants. The list must include the unit number if applicable, the tenant/applicants race, whether they utilize or are seeking an accessible unit, whether they have children and how they became aware of the availability of the unit(s).

4. ASSESSMENT OF MARKETING ACTIVITIES & CORRECTIVE ACTIONS:

a. Home Trust of Skagit will annually conduct an internal review of marketing activities to determine compliance with the previously approved plan.

b. Assessment Procedure: The marketing activities will be reviewed through a variety of methods including, but not limited to, review of records in the marketing file and examining the number of referrals received from community or minority organizations, the number of calls, visits or walk-ins due to outreach or advertising. The assessment will also include a comparison between the projects tenant/waiting list and the housing market area to determine if the marketing is adequately reaching those groups that were previously identified in Box#3 of the plan.

Home Trust is required to make good faith efforts to design and implement an AFHM plan, to retain marketing documents, maintain accurate files, to participate in an annual review, and to implement changes in plans when corrections are required. Failure to comply with any of the requirements in this policy may lead to corrective actions up to and including being prohibited from further participation in Housing Development Fund programs.

Overview of the AFHM Plan

The Affirmative Fair Housing Marketing Plan (AFHMP) is a marketing plan designed to attract buyers and renters of all majority and minority groups regardless of race, religion, color, national origin, sex, disability and familial status to assisted rental units and single family dwellings which are being marketed for sale while providing the opportunity to target specific groups who may need special outreach to be made aware of and apply for the housing.

The creation of an AFHMP can be broken down into the following four (4) areas:

1. **Targeting:** Identify the segments of the eligible population which are least likely to apply for housing without special outreach efforts. This is done by first establishing a housing market area. This is the area where you will reasonably expect to find tenants who wish to apply for units at the property. This can be a census tract, multiple tracts, a county or more than one county. Once the area is defined then review the demographic information in the census and other available data and determine what groups of people living in your area are the least likely to apply to live in your project without you actively seeking them out with this marketing plan.

2. **Outreach:** Having identified the groups needed for targeting, then Home Trust of Skagit must develop an outreach program which includes special measures designed to attract those groups and other efforts designed to attract persons from the total population. Devise ways to reach the population you identified in step one that are unique to your area. What groups can you partner with who have contact with the people you are trying to reach? Are there any minority or disability groups in your area that can help you spread the word about your available units? Do the units you have available meet specific needs of the people in your area i.e. transportation, accessibility, proximity to services etc.? If so, how can you let them know what your units offer? Think outside the box and focus on what ways you can use to reach the groups you identified.

3. **Assessment Indicators:** Develop a plan for what information you are going to track that will allow you to measure the plans effectiveness. This is another area where you have the freedom to be creative. Some examples of methods that can be used include: Noting if the program effectively attracted buyers or renters who are from the majority and minority groups including persons with disabilities and families with children as represented in the total population of the housing market area; Tracking how many referrals you have received from the groups you utilized; Logging how many walk-ins or phone inquiries are received from people who indicate they are responding to your marketing.

4. **Staff Training:** Home Trust is committed to fair housing training. Home Trust will promote the increase of knowledge of fair housing principles and will monitor their capacity.

Good Faith Effort

The effectiveness of a plan will be measured not by quotas but by an examination of the effort utilized in the implementation of the marketing plan. During the annual review Home Trust of Skagit will be seeking evidence of good faith efforts to effectively utilize plans. Home Trust of Skagit must keep documentation of all marketing efforts during the year so that it can be re-viewed annually and a determination can be made whether or not we have acted in good faith in following their plan.

Good faith efforts can be documented in the following ways:

1. **Advertising** – Maintain records, for a period of five (5) years, of any advertising in print and electronic media that was placed in publications or locations which are primarily viewed or listened to by those groups you identified in step 1 above;
2. **Marketing** – Keep records, for a period of five (5) years, of efforts where you communicated or worked with specific community, religious or other organizations frequented by those groups identified in step 1. Work with these groups to set up a referral network and track any referrals that come from these groups.
3. **Develop a brochure or handout** – The brochure or handout should describe facilities or services that your project offers, or that are available in close proximity, which can be used by buyers or renters, e.g., transportation services, schools, hospitals, industry, and recreational facilities. The brochure should also describe how the proposed project will be accessible to physically handicapped persons and state that reasonable accommodations will be made for persons with disabilities
4. **Training** – This is a very important component in determining if an owner is operating in good faith. Owners should track and maintain records, for a period of five (5) years, which indicate that the sales/rental staff has read and understood the Fair Housing Act, and the purpose and objectives of the AFHM Plan. Owners should engage in training their staff at least annually and be able to provide details as to the content of the training the staff received.

APPENDIX A

Affirmative Fair Housing Marketing (AFHM) Plan - Multi-Family Housing

APPENDIX B

Affirmative Fair Housing Marketing (AFHM) Plan - Single Family Housing