PHB Fall 2012 NOFA

Equity Glossary

MWESB Construction

- PHB abides by the established City of Portland Business and Workforce Equity policies, described in the detailed attachment to this document.
- PHB will award points in its competitive process for utilization of a Minority or Women owned general contractor.

Formula for MWESB Calculation

- Numerator = 1st Tier, Denominator = Total Construction Cost = % utilization

 The above is true of the City requirements, but during the construction and at the end of the job the procurement office includes 2nd Tier certified subs in the calculation of the numerator for the final MWESB %. The reason why 2nd Tier certified subs are not captured upfront is the requirements of the GFE (Good Faith Effort) Program only look at 1st Tier subs in the initial calculation (Form 1 of the GFE Program).
- Define 2nd Tier
 The City doesn't have a stated definition of a 2nd Tier sub, but it can be defined as a sub-contractor working under contract with a 1st Tier subcontractor on a job (i.e. small subcontractor, supplier, etc).
- Describe how Self Performed work gets counted
 MWESB participation for self performed work is only included if the general contractor is a certified MWESB contractor.

M/W Professional Services

- Any and all consulting or sub-consulting services for a project provided under contract by a
 licensed professional who is a member of a racial minority, or is a woman (if firm, be majority
 owner), or a culturally based not-for-profit. Professionals are encouraged, but not required, to
 become MWESB certified. A professional service provider can provide self-certification in a
 letter to be included in NOFA response. A sample self-certification letter is attached to this
 document.
- PHB will award points in its competitive process for utilization of one or more individuals/firms that meet this definition.

Workforce

- PHB abides by the established City of Portland Workforce Equity polices, described in the detailed attachment to this document
- Use of Apprentices Good faith (pre)apprentice recruitment efforts are those intense, aggressive, sincere, and result-oriented actions taken by the Contractor designed to accomplish the objectives of the City Workforce Training & Hiring Programs. These efforts may assist the

Contractor in achieving an "A" level EEO certification. Good faith recruitment efforts include, but are not limited to:

- Work aggressively with Contractor's Joint Apprenticeship Training Committee (JATC) to recruit minorities, women and disadvantaged individuals. Provide evidence of these efforts.
- 2. Assist the JATC by conducting a workshop with minority and women employees to enlist their assistance as recruiters and request their ideas on how to increase employment of underutilized groups.
- 3. Support the efforts of the Contractor's JATC by giving all apprentices referred to the Contractor a fair chance to perform successfully, allowing for possible lack of previous experience. Recognize that the Contractor is responsible for providing onthe-job training, and that all apprentices should not be expected to have previous experience.
- 4. Participate in job fairs, school-to-work, and community events to recruit minorities, women, and disadvantaged individuals into the construction trades.
- 5. Allow scheduled job site visits by participants in community programs, as safety allows, increasing awareness of job and training opportunities in the construction trades.
- 6. Keep applications of those not selected for an opening. Contact when opening occurs.
- Use of Pre-Apprenticeship Training Programs (PATP's) Constructing Hope, Portland Youth Build, Oregon Tradeswomen, NW College of Construction:
 These organizations can help place pre-apprentices or apprentices that may be ready for hiring through the union or open shops or at a minimum increasing awareness of those in the preapprentice arena of opportunities for experience and job opportunities through apprentice

Affirmative Fair Housing Marketing Plan

- A sample Affirmative Fair Housing Marketing Plan is attached to this document
- OON Fair Housing Best Practices (link)
- AFHMP reporting using PHB 2012-13 data collection methodology (attached)

Community Partnership

programs.

- For purposes of advancing equity goals, a partnership among a housing developer and an
 appropriate culturally specific community based organization can be documented by an
 executed partnership agreement, or by a letter of intent describing the partnership and
 authorized by the board of directors of the community specific organization.
- The description of the partnership shall include:
 - Purpose of the partnership
 - o Roles of each partner
 - Duration of the partnership
 - Financial interests of the parties

PHB works with a variety of organizations and is aware that there are:

- Culturally specific programs offered by culturally specific organizations.
- Culturally specific programs offered by culturally competent mainstream organizations.
- Culturally competent programs offered by culturally competent mainstream organizations.

Culturally Competent Program and/or Organization:

A program or organization that values diversity and provides for the full acceptance of cultural differences by establishing environments, resources, and supports that incorporate the strengths of different cultural groups in the design and implementation of public policy and programming.

Culturally Specific Program and/or Organization:

- Majority of clients served are from a specific cultural community (e.g. African American, African, Asian-Pacific Islander, Native American/Alaska Native, Latino/Hispanic, Slavic/Russian speaking).
- Predominance of bilingual and/or bicultural staff that reflects the community served (e.g. African American, African, Asian-Pacific Islander, Native American/Alaska Native, Latino/Hispanic, Slavic/Russian speaking).
- Organizational or program environment is culturally focused and identifiable by consumer as such.
- Established and successful community engagement and involvement with the culturally specific community being served.

Demographic Access Disparities

Review of race/ethnicity of current residents compared with members race/ethnic groups in need of affordable housing due to level of poverty who are not represented in resident population, when an organization is not mission-based to serve a culturally specific group, or is providing a culturally specific program. Helps org. answer the question – why are (race/ethnicity specific persons) not successfully renting units here, what can be effectively done to increase inclusion?

Operations

Any and all vendors or services for a project provided under contract by a provider or firm who is a member of (or firm is majority owned by) a racial minority, or is a woman (if firm, be majority owner), or a culturally based not-for-profit. Providers are encouraged, but not required, to become MWESB certified. An individual or firm can provide self-certification in a letter to be included in NOFA response. A sample self-certification letter is attached to this document.

Resident Services Plan

- RSP reporting using new PHB disaggregated data collection methodology?
- Resident outcomes analyzed by race for disparate outcomes. Helps org. answer the questions –
 why are (race/ethnicity specific persons) experiencing disparate outcomes, what can be effectively done to improve outcomes?

Attachment - Business and Workforce Equity

PHB adheres to all policy goals and objectives adopted by the City of Portland and the Portland Development Commission as well as the federal Department of Housing and Urban Development that aim to increase the participation of historically disadvantaged businesses and populations in the expenditure of public funds. Development teams should engage Minority, Women and Emerging Small Business (M/W/ESB) firms early in the development process to aid in increasing participation.

PHB's business equity goals are described in PHB's Strategic Plan and includes the following:

Business Equity Program: Applies to construction loan projects with PHB financing of \$200,000 or more and with construction costs greater than or equal to \$200,000. PHB uses a goal of 20% utilization of state-certified M/W/ESB firms for "direct construction costs" also known as "hard costs" in residential low-rise projects. The goal is the same for high-rise projects except that high-rise construction will be reviewed with an analysis of availability and capacity of certified firms for the specific project(s). In addition, PHB has a specific focus on firms operated by people of color and expects contractors to, at a minimum, aim for a balance in utilization between minority-owned, women-owned and emerging small business. These goals are found in PDC"s adopted Business and Workforce Equity Policy which can be found here: http://www.pdc.us/mwesb/default.asp. While the written policy applies to projects that use tax increment funds, the Bureau applies the policy to all projects regardless of funding source.

- An important component of Business Equity is the Good Faith Effort Program (GFE). While 20% M/W/ESB utilization is a goal, the GFE is a requirement for all projects. The Good Faith Effort Program requires prime contractors to make an effort to provide subcontracting opportunities to state certified Minority-owned, Women-owned or Emerging Small Business (M/W/ESB) firms. The prime is required to contact state certified firms by fax or letter and phone for those divisions of work specified by the City at the time the contract is put out to bid. Efforts to contact and work with certified firms must be documented to the City. More information on the GFE can be found here: Good Faith Effort.
- Section 3 [HUD Act of 1968 (24 CFR part 135)] is a federal requirement related to the Business Equity Program for projects receiving federal funding. Section 3 requires that when employment or contracting opportunities are generated by HUD funded projects, preference is given to low income persons and business residing in the community where the project is located (Section3 "residents and business concerns"). Owners and their contracting partners are responsible for ensuring compliance with Section 3 in the hiring and contracting decisions made on the project. PHB is responsible for overseeing and reporting to HUD on Section 3 outcomes and providing tools and resources to achieve these outcomes. The owner must include Section 3 considerations in their procurement of a General Contractor.
- MWESB and Section 3 notification and outreach: in an effort to maximize the potential of
 obtaining MWESB and Section 3 business participation, prime contractors will be required to
 show that they have engaged the subcontracting community and informed them of the
 contracting opportunities available. These outreach activities must be documented,
 incorporated into the MWESB and Section 3 Business Utilization Plan and submitted to the
 Contract Compliance Specialist for approval.

At minimum, the prime contractor must:

- Advertise contracting opportunities in the Daily Journal of Commerce, the Asian Reporter, The Skanner, El Hispanic News, The Portland Observer, other trade publications, and at Plan Centers.
- Send a direct mail announcement of subcontracting opportunities to minority, women, and emerging small business organizations, such as the Oregon Association of Minority Entrepreneurs (OAME) and the National Association of Minority Contractors (NAMCO).
- O Issue a bid solicitation letter to a least five (5) MWESB subcontractors in each Division of Work to be subcontracted at least two (2) weeks prior to the bid submission deadline. A list of certified MWESB firms can be obtained from the State of Oregon Office of Minority, Women, and Emerging Small Business website at: http://www4.cbs.state.or.us/ex/dir/omwesb/.
- Obtain a list of certified Section 3 Businesses from the Contract Compliance Specialist. Since the Section 3 Program is new and has a limited number of certified firms, any firm bidding on this project must submit a Section 3 Business Concern Application in order to be eligible to bid (Exhibit B).
- Place follow-up phone calls to all certified firms asked to bid, prior to bid due date, to determine if a bid will be submitted.
- o Follow-up with all certified firms, who submitted competitive bids, to clarify any questions which may arise.

Workforce Training and Hiring Program: Applies to construction loan projects with prime contracts of \$200,000 or more and subcontractors having a subcontract of \$100,000 or more. The purpose of this program is to maximize apprenticeship and employment opportunities for minorities and women in the construction trades on projects. Program guidelines and general conditions that are effective at the time the loan agreement is executed shall be applied to the Project. To more effectively promote the Workforce Training and Hiring Program specifically and all Business and Workforce Equity Programs, PHB will require pre-bid meetings for all new projects with City of Portland Procurement Services staff, PHB Senior Construction Coordinator and a PHB Housing Manager or designee(s.)

 Prime contractors and subcontractors with contracts of \$100,000 or more must before starting work on a project submit proof of registration as a Training Agent with the Bureau of Labor and Industry (BOLI), Apprenticeship and Training Division. For those who aren't already registered training agents contact BOLI at (971) 673-0760 or the City of Portland at (503) 823-6888 for information.

Equal Employment Opportunity Certification: General contractors are required to become EEO certified by the City of Portland within 30 days of signing PHB loan closing documents.

Attachment - SAMPLE Minority or Woman Professional Service Provider or Vendor Self-Certification Letter

FIRM LETTERHEAD
Date
To: Project Sponsor
RE: Professional Services/Vendor Availability for (Project)
For your use in responding to the Portland Housing Bureau's Fall 2012 NOFA for funding for the referenced project, wherein PHB has encouraged utilization of professional service providers who are minority or women owned businesses, I hereby certify that I am the sole (or a >51% if a firm) owner of (Registered Name of Business), and I am a racial minority/woman.
[certifying individual/firm can elaborate on their efforts to create opportunity and increase inclusion of racial/ethnic minorities here]
I further certify that I am available and willing to provide a scope of services for the project that will include, but is not limited to (brief scope description).
I will review the requirements for MWESB certification with Oregon Bureau of Labor and Industries within the next year, and consider completing the certification process.
I am available to further discuss my scope of work with you and PHB staff, as needed.
Sincerely,
(Provider)
Address & Contact info

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf for the instructions. Using Nuance software is the only means of completing this form.

Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity OMB Approval No. 2529-0013 (exp. 8/31/2013)

1a. Project Name & Address (including City	y, County, State & Zip Code)	1b. Project Contract Number 1c. No. of Units
		1d. Census Tract
		1e. Housing/Expanded Housing Market Area
1f. Managing Agent Name, Address (include	ding City, County, State & Zip Code), Te	elephone Number & Email Address
1g. Application/Owner/Developer Name, Ad	ddress (including City, County, State 8	& Zip Code), Telephone Number & Email Address
1h. Entity Responsible for Marketing (chec	k all that apply)	
	(specify)	
Position, Name (if known), Address (include		ephone Number & Email Address
· · · · · · · · · · · · · · · · · · ·		
1i. To whom should approval and other co	rrespondence concerning this AFHMP	be sent? Indicate Name, Address (including City,
State & Zip Code), Telephone Number & E-		
2a. Affirmative Fair Housing Marketing Pla	n	
Plan Type	Date of the First Approved AFHMP:	
Reason(s) for current update:		
2b. HUD-Approved Occupancy of the Project	ect (check all that apply)	
Elderly Family	Mixed (Elderly/Disabled)	Disabled
2c. Date of Initial Occupancy	2d. Advertising Start Date	
	Advertising must begin at least 90 da construction and substantial rehabilit	ays prior to initial or renewed occupancy for new ation projects.
	Date advertising began or will begin	
	For existing projects, select below	the reason advertising will be used:
	To fill existing unit vacancies	
	To place applicants on a waiting list	(which currently has individuals)
	To reopen a closed waiting list	(which currently has individuals)

b. Ta	rgeted Marketing Activity						
	ed on your completed Worksheet 1, inc sing without special outreach efforts.			market area is/are <i>least</i> likely to apply for the			
	White American Indian or Alaska Native Asian Black or African American						
	Native Hawaiian or Other Pacific Isla	nder	Hispanic or Latino	Persons with Disabilities			
	Families with Children	Other ethnic grou	up, religion, etc. (specify)				
Res	idency Preference						
	he owner requesting a residency pre o, proceed to Block 4b.	ference? If yes, co	omplete questions 1 through	5.			
(1)	Туре						
(2)	Is the residency preference area The same as the AFHMP housing/e		market area as identified in	Block 1e?			
	The same as the residency preferer	ce area of the loca	al PHA in whose jurisdiction	the project is located?			
(3)	What is the geographic area for the	e residency prefe	rence?				
(4)	What is the reason for having a re	sidency preferenc	ce?				
	How do you plan to periodically eval	uate your residency in 24 CFR 5.105(a		is in accordance with the non-discrimination			

complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

4b. **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.

4c. 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 copies of advertisements, radio and television scripts, Internet advertisements, websites, and 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 (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

Rental Office

Real Estate Office

Model Unit

Other (specify)

5b. Affirmative Fair Housing Marketing Plan

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

Rental Office

Real Estate Office

Model Unit

Other (specify)

5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office

Real Estate Office

Model Unit

Entrance to Project

Other (specify)

The size of the Project Site Sign will be

Х

The Equal Housing Opportunity logo or slogan or statement will be

Х

6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make 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: AFHMP

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?
- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (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?
- (2) What staff positions are/will be responsible for tenant selection?

7d. Staff Instruction/Training:

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

8. Additional Considerations is there anything else your program is marketed to those least likely to apply fineeded.		
9. Review and Update		
By signing this form, the applicant/respondent agree in accordance with the instructions to item 9 of this form in o		
Housing Marketing Regulations (see 24 CFR Part 200, S	Subpart M). I hereby certify that all the in	formation stated herein,
as well as any information provided in the accompanin false claims and statements. Conviction may result in		- · · · · · · · · · · · · · · · · · · ·
31 U.S.C. 3729, 3802).	criminal and/or civil penalities. (See To	0.3.6. 1001, 1010, 1012,
Signature of person submitting this Plan & Date of Su	hmission (mm/dd/yyyyy)	_
orginatore of person submitting this Fran & Date of Ca	isimission (mm/dd/yyyy)	
Name (tors a gradual)		
Name (type or print)		
Title & Name of Company		
	- IIII	
For HUD-Office of Housing Use Only	For HUD-Office of Fair Housing a	nd Equal Opportunity Use Only
Reviewing Official:		
	Approval	Disapproval
Signature & Date (mm/dd/yyyy)	Signature & Date (mm/dd/yyyy)	_
Name	Name	
(type or	(type or	
print)	print)	
Title	Title	
	•	

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, 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.

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 Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP 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. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM 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 AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD 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 program applicants.

INSTRUCTIONS:

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

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 the U.S. Census Bureau (<u>www.census.gov</u>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. 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. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

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

Part 2: Type of AFHMP

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD 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- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.

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 may 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's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded 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."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

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 by checking all that apply.

Part 4 - Marketing Program and Residency Preference (if any).

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone 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 assisting with affirmative fair housing marketing or outreach.

Block 4c - 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, the reason for choosing this media, and the language of the advertisement. 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) should be described.

Please attach a copy of the advertising or marketing material.

Part 5 – Availability of the Fair Housing Poster, AFHMP, 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 AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c -The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, 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. Please submit photographs of project site signs.

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 individuals 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 AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently.

In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. 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 staff 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 individuals least likely to apply for the subject housing.

Part 9 - Review and Update.

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least to likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

Notification of Intent to Begin Marketing.

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP 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 AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.

Form HUD-935.2A (12/2011)

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

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. Please attach maps showing both the housing market area and the expanded housing market area.

<u>Instructions</u>: For demographic data from the 2010 Census, please see http://factfinder2.census.gov/main.html. To find data by Census Tract, County, Metropolitan Statistical Area (MSA), or other level:

- 1. Click "Geographies" on the left.
- 2. Click the "Address" Tab and enter the address of the project and then click "GO".

(*To create a map of the area click the "Maps" tab*)

3. Select the level of interest (Census Tract, County, MSA, or other) and then close the "Select Geographies" box.

(Do NOT select more than one level at a time)

- 4. Click the first "Profile of General Population and Housing Characteristics: 2010" also known as DP-1.
 - (Refer to the "Race" section "Total Population" subsection for breakdown of demographic characteristics)
- 5. Record the information in Worksheet 1 for that level, click "Back to Search" in the top left corner, then click "Clear all Selections" in the "Selections" Box in the top left corner.
- 6. Start process again to retrieve the next level of data (County, MSA, or other).

To collect information about the percentage of persons with disabilities repeat above steps 1 through 3 to select your level of interest (Census Tract, County, MSA, etc.) then:

- 1. Click "Topics" on the left.
- 2. Click "People".
- 3. Click "Disability" and then click the "Disability" link directly beneath it.
- 4. <u>For Census Tract</u>- Select the first "Disability Status by Sex: 2000" or QT-P21. Please note that the most recent information for census tract is from 2000. In this section report percent with a disability for both sexes for population 5 years and over. <u>For County or MSA</u>- Select the first "Selected Social Characteristics in the United States" or DP02 and report the percent of the total civilian noninstitutionalized population with a disability.
- 5. Record the information in Worksheet 1 and then click "Back to Search" in the top left corner, then click the "X" next to the level in the "Your Selections" box, but **KEEP** "DISABILITY" as a selection.
- 6. Repeat for next level of data (County, MSA, or other).

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White					
% Black or African American					
% Hispanic or Latino					
% Asian					
% American Indian or Alaskan Native					
% Native Hawaiian or Pacific Islander					
% Persons with Disabilities					
% Families with Children under the age of 18					
Other (specify)					

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project 's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

Demographic Characteristics	Project's Residents (as determined in Worksheet 1)	Project's Applicant Data (as determined in Worksheet 1)	Census Tract (as determined in Worksheet 1)	Housing Market Area (as determined in Worksheet 1)	Expanded Housing Market Area (as determined in Worksheet 1)	Residency Preference Area (if applicable)
% White						
% Black or African American						
% Hispanic or Latino						
% Asian						
% American Indian or Alaskan Native						
% Native Hawaiian or Pacific Islander						
% Persons with Disabilities						
% Families with Children under the age of 18						
Other (specify)						

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

Targeted Population(s)	Community Contact(s), including required information noted above.
,	

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

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

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population:	Targeted Population:	Targeted Population:
Newspaper(s)			
Radio Station(s)			
TV Station(s)			
Electronic Media			
Bulletin Boards			
Brochures, Notices, Flyers			
Other (specify)			