

AFFIRMATIVE FAIR HOUSING MARKETING PLAN (AFHMP) INSTRUCTIONS

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AFHMP Submissions

Submit completed forms electronically to:

New plans – Send to:

Tonia Kaczmarczyk at KaczmarczykT@michigan.gov and
Kara Hart-Negrich at HartNegrichK@michigan.gov.

Updated plans – Send to MSHDA-AFHMP@michigan.gov for review.

1. Introduction

MSHDA’s Affirmative Fair Housing Marketing Plan (AFHMP) requirements provide persons of all racial and/or ethnic backgrounds with an opportunity for occupancy in a MSHDA-financed development in a percentage that is somewhat reflective of the racial population percentages in the housing development’s market area. MSHDA’s AFHMP requirements also necessitate all AFHMPs must market to persons with disabilities. The Affirmative Marketing program should ensure that any group(s) of persons ordinarily not likely to apply for this housing without special outreach (refer to the Direction of Marketing section), know about the housing, and feel welcome to apply and have the opportunity to rent.

2. Application Identification

MSHDA No. – Enter the MSHDA development number or loan number.

HUD Contract No. – Enter the HUD contract number, if applicable.

2A. Development - Enter the applicable development's name; address; city, state, zip code; e-mail; telephone; and a contact name.

2B. Managing Agent – Enter the managing agent's name; address; city, state, zip code; e-mail; telephone; and a contact name.

2C. Owner – Enter the development ownership's name; address; city, state, zip code; e-mail; telephone; and a contact name.

2D. Housing Market Area Boundaries & Census Tract – Enter the housing market area and the census tract in which the housing will be/is located. Applicants may obtain census tract information from the following website: www.census.gov or from local planning agencies, public libraries, and other sources of census data.

2E. Type and Number of Housing Units – Enter the number of family and elderly units along with the total number of units at the development.

2F. Rental Range – Enter the range of rental rates in dollars. Include a copy of the most current approved rent schedule with the application.

3. Type of Affirmative Marketing Plan

3A. Plan Status (Check one) – Indicate whether the AFHMP is a new or updated plan:

- New plan – No previous plan submitted and approved.
 - **Approximate Starting Dates (mm/dd/yyyy)** – If new plan, specify the approximate begin date of:
 - ✓ Advertising activities to the groups targeted for special outreach.
 - ✓ Initial occupancy (if unoccupied).
- Updated plan - See the **“AFHMP Updating and Certification”** section of these instructions for more detailed information.

3B. Housing Market Composition – The plan should include the racial composition of the population in the housing market area. Enter the total percentage of each racial category identified on the form. The [U.S. Census Bureau QuickFacts: United States](http://www.census.gov/quickfacts) website can help provide the racial composition of the marketing area.

4. Direction of Marketing Activity

Indicate which ethnic group(s) or protected groups are believed to least likely apply for this housing without special outreach. *Check all that apply* from the following racial categories:

- White (non-Hispanic)
- Black (non-Hispanic)
- Hispanic
- Asian/Native Hawaiian/Pacific Islander
- American Indian/Alaskan Native
- Families with Children
- Persons with Disabilities (Developments must affirmatively market to people with disabilities)

Consider the following factors when making your decision for special outreach:

- Price.
- Sponsorship of housing.
- Racial/ethnic characteristics of housing market in which housing will be or is located.
- Disability.
- Familial status of eligible population.
- Public transportation routes.
- Any other factor that may be pertinent to the housing development.

5. Marketing Program

5A. Commercial Media – Determine what media will be used to advertise the availability of this housing. Check all the marketing sources that apply.

In addition, identify the:

- Name of the Newspaper, radio or TV station that will be used for the advertising.
- Racial/ethnic identification of the intended audience – White, African American, American Indian or Alaskan Native, Asian, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, persons with disabilities, and families with children).
- Size and durations of the advertising campaign.

5B. Brochures, Signs and HUD's Fair Housing Poster – Identify signs and posters used for advertising and provide copies of the materials.

1. Indicate whether brochures, leaflets, or handouts will be used to advertise.
 - If yes, explain the how the materials will be distributed and attach copies.
2. Indicate the sign size for the project site sign as well as the logo type size.
 - Attach a photograph of the project sign.

3. Indicate where Fair Housing Posters will be conspicuously displayed during the rental showing process.
 - Rental or leasing office(s)
 - On-site management office(s)
 - Model units
 - Other – Identify location.

5C. Community Contacts – List any community contacts. These are individuals or organizations that are known in the housing market area that can influence persons within groups considered least likely to apply. Such contacts may include, but are not limited to:

- Neighborhood minority organizations,
- Grass root faith-based or other community-based organizations,
- Disability advocates,
- Public or private agencies.

For each agency include the following information:

1. Name of group/organization
2. Group identification
3. Date of contact or proposed contact
4. Person to be contacted
5. Address & telephone
6. Method of contacts
7. Specific function the group/organization will undertake in implementing the marketing program.

6. Future Marketing Activities

Indicate the future marketing activities planned to fill vacancies as they occur after the development is initially occupied. Check all items that apply.

- Newspapers/publications.
- Radio.
- Television.
- Site signs.
- Brochures or leaflets or handouts.
- Community contacts.
- Websites or Internet.
- Other – Specify the activity.

7. Fair Housing Experience and Staff Trainings

Provide the following information in this section of the form:

- Identify what experience the rental staff has in marketing housing to the racial group(s) identified as least likely to apply for the housing.
- Indicate how often the staff receive fair housing training.
- List all the trainings completed by the marketing staff related to Federal, State, and local fair housing laws and regulations and the AFHMP. **A copy of the instructions provided to staff regarding fair housing training must be included with this application.**

8. AFHMP Goals

The following items must be included on a separate attachment(s) and included with each application or update to the AFHMP:

- Indicate the number of units you expect to rent to the population identified as least likely to apply for housing at your development based on the racial/ethnic demographics in your market area.
- Provide the same information for persons with disabilities.
- Provide a breakdown of the overall marketing budget and the part that will be used to implement the plan.
- Indicate the amount of money budgeted for commercial media usage.
- Indicate who is responsible for completing the outreach program.
- Outline in writing the prior experience of the Management Agent in setting and achieving affirmative fair housing marketing goals. Use the Affirmative/Disability Marketing Goals and Achievements (MSHDA Mgmt. 440C) form.

9. AFHM Requirements

By signing the form, the Management Agent on behalf of the Owner agrees to comply with the following requirements that:

- A continuous outreach program will be conducted to maintain a well-balanced waiting list that will always assure the meeting of the affirmative marketing goals.
- A housing discrimination disclaimer clause shall be included in any preliminary and/or full application blank. (Pledge not to discriminate against applicants based on their race, sex, age, religion, national origin, familial status, or disability.)
- The Equal Housing Opportunity logo and the Accessibility logo if the development has barrier free or accessible units will be in all advertisements. The approved logo looks

like: 

- A log of community contacts, daily traffic records, and any other record keeping materials be maintained for inspection and validation of the marketing effectiveness. Also, maintain a copy of the AFHMP on-site.
- All fair housing required signs will be posted in designated locations.

- F. The Management Agent has agreed to start Affirmative Fair Housing Marketing efforts with respect to the “target population” at least 120 days prior to anticipated initial occupancy (if applicable).
- G. Any prospective residential preferences will be identified and made known.
- H. A review of the development AFHMP will occur every 5 years and marketing objectives will continue to be based on the area’s latest demographics identified in the most recent plan.

AFHMP Updating and Certification

The Owner must submit an updated AFHMP for review and approval when:

1. **Owner’s Analysis Determination** – An analysis of the current AFHMP results in a determination by the owner that the current AFHMP:
 - a. Finds that the population least likely to apply for housing is not identified in the current AFHMP, **OR**
 - b. No longer advertises or outreaches to the appropriate population and requires modification or expansion, **OR**
 - c. Is not satisfactory in some other way.
2. **Residency Preference Changes** – The owner changes the residency or admissions preference as defined below.

Owner Analysis

A development owner must conduct an analysis of an existing AFHMP when:

- Five (5) years have lapsed since the approval of the last MSHDA-approved AFHMP.
- The Michigan State Housing Development Authority’s Consolidated Plan has been updated.
- A significant demographic change has occurred in the housing market area.

If the development owner’s analysis results in a determination that the current plan is **satisfactory**, including demonstrating that current marketing and outreach is targeting diverse areas where individuals least likely to apply for housing currently live, then the development owner may submit the AFHMP Update Certification form (MSHDA Mgmt. 440D). Owners should retain a copy of the analysis for their own records.

Residency Preference

A development owner must submit an updated AFHMP for review and approval if either of the following occurs:

- The owner has adopted a residency preference for admission of persons who reside in a specified geographic area (“residency preference area”) as described in 24 CFR 5.655 (c)(iii) subparts A and C.

- The owner has adopted an admissions preference for admission of persons who reside in a specified geographic area that has not previously been approved.