

AFFIRMATIVE FAIR HOUSING MARKETING PLAN (AFHMP) INSTRUCTIONS

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AFHMP Submissions

Completed forms can be submitted to:

MSHDA – Cadillac Place
Attn: Director, Asset Management Division
3028 W. Grand Blvd., Suite 4-600
Detroit, MI 48202

Or submitted electronically to:

rayw@michigan.gov and/or
whitmore@michigan.gov

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

2A. Applicant - Enter the applicant's name; address; city, state, zip code; e-mail; telephone; and contact name.

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

2C. Managing Agent - Enter the managing agent's name; address; city, state, zip code; e-mail; telephone; and 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 (reference QuickFacts) or from local planning agencies, public libraries, and other sources of census data.

2E. MSHDA & HAP Contract - Enter both your MSHDA number and your HAP Contract number, if applicable. Also enter the number of units.

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

2G. Type of Multifamily Housing - Indicate whether the type of multifamily housing is elderly or non-elderly.

2H. Approximate Starting Dates - Specify the approximate date for starting marketing activities to the groups targeted for special outreach and the anticipated date of initial occupancy (if unoccupied).

3. Type of Affirmative Marketing Plan

Indicate whether the AFHMP is a new or updated plan. If updating a plan, see the "AFHMP Updating and Certification" section of these instructions for more detailed information.

The plan should also indicate the racial composition of the housing market area in which the housing will be/is located by choosing one of the three options:

- Minority,
- White (non-minority), or,
- Mixed area - if 'mixed area' is selected, indicate the percentage of minority residents.

4. Direction of Marketing Activity

Indicate which ethnic group(s) is believed to least likely apply for this housing without special outreach. “x” all the boxes that apply.

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. “x” all the marketing sources that apply.

In addition, identify the:

- Newspaper, radio or TV station that will be used for the advertising.
- Racial/ethnic identification (e.g. 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) of the audience, and,
- Size/durations of advertising.

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, attach a copy and explain how it will be distributed.
2. Indicate the sign size for the project site sign as well as the logotype size. Attach a photograph of the project sign.
3. Indicate where Fair Housing Posters will be conspicuously displayed during the rental showing process.

5C. Community Contacts – List any community contacts. These are individuals or organizations that are known in the housing market area of the locality 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:

- A. Name of group/organization
- B. Group identification
- C. Date of contact or proposed contact
- D. Person to be contacted
- E. Address & telephone
- F. Method of contacts
- G. 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. "x" all boxes that apply.

7. Experience and Staff Instructions

Identify what experience the rental staff has experience in marketing housing to the group(s) identified as least likely to apply for the housing. Indicate how often the staff training is updated. Include all training regarding 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:

- a. 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.
- b. Provide the same information for person with disabilities.
- c. Provide a breakdown of the overall marketing budget and the part that will be used to implement the plan.
- d. Indicate the amount of money budgeted for commercial media usage.
- e. Indicate who is responsible for completing the outreach program.
- f. 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.

Additional Requirements

The Plan must also contain an Agreement signed by the Management Agent on behalf of the Owner to comply with the following requirements:

1. That a continuous outreach program will be conducted to maintain a well-balanced waiting list that will assure the meeting of the affirmative marketing goal at all times.
2. That 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.)
3. That the accessibility logo (see bottom of these instructions) will be in all advertisements, if the development has barrier free or accessible units.
4. That the MSHDA-approved equal opportunity housing slogan or logo (see bottom of these instructions) will be included in all advertising.
5. That a log of community contacts, daily traffic records, and any other record keeping materials be maintained for inspection and a copy of the AFHMP will be kept on-site.
6. That all fair housing required signs will be posted in designated locations.
7. That 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).
8. That any prospective residential preferences will be identified and made known.

AFHMP Updating and Certification

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

1. **Owner’s Analysis** – An analysis of the current AFHMP results in a determination by the owner that the current AFHMP is not satisfactory, including finding that the population least likely to apply for housing is not identified in the current AFHMP **or** that advertising, publicity, or outreach are no longer appropriate and require modification or expansion, **OR**
2. **Residency Preference** - 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; **OR**
- The Michigan State Housing Development Authority’s Consolidated Plan has been updated; **OR**
- 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 owner 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.